CITY OF LOS ANGELES
DEPARTMENT OF CITY PLANNING
CITY HALL 200 NORTH SPRING STREET LOS ANGELES CA 90012

SUSTAINABLE COMMUNITIES ENVIRONMENTAL ASSESSMENT

South Hill Street Project

Case Number: ENV-2018-2857-SCEA

Project Location: 1101–1115 South Hill Street and 206–210 West 11th Street
Los Angeles, CA 90015

Community Plan Area: Central City Plan Area

Council District: 14 – Kevin de León

Project Description:

The project would remove the existing vacant warehouse on the Project Site and one non-protected street tree on the South Hill Street sidewalk and construct a 40-story mixed-use building with up to 319 multi-family residential condominium units, up to 160 Transient Occupancy Residential Structure (TORS) units (dwelling units with kitchens operating as a commercial hotel with occupancy for 30 days or less), and up to 3,429 sf of ground floor commercial uses. The project would include one level of subterranean parking, one level of ground floor commercial uses, three levels of aboveground parking, and 36 stories of residential and TORS uses and amenities. Residential units would be located in levels 14 through 38 with the TORS units located on levels 6 through 13. It is anticipated that the residential unit count would comprise 24 studio units, 144 one-bedroom units, 127 two-bedroom units, 20 three-bedroom units, and 4 three-bedroom penthouse units. The ground floor commercial uses would consist of restaurant uses. Overall, the proposed high-rise building would comprise up to 491,977 sf of floor area and would reach a maximum height of 520 feet above ground level, when accounting for rooftop structures. When the project is complete, the post-dedicated lot area would be 26,683 sf (0.61 acres).

Open space and amenities for the project's residential and TORS uses would include private balconies, landscaped amenity terraces, and recreational amenities. The project would provide for up to 436 vehicle parking spaces, including 325 residential parking spaces and 111 TORS parking spaces. The project would provide automated parking within three above grade stories and double stackers and overhead lifts with valet in one subterranean level. In addition, the project would provide up to 347 bicycle parking spaces (up to 56 short-term and 291 long-term).

PREPARED FOR:
City of Los Angeles
Department of City Planning

PREPARED BY:
Kimley-Horn and ICF

APPLICANT:
Crown 1111, LLC

February 2022

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SECTION 1

Introduction

This Sustainable Communities Environmental Assessment (SCEA) has been prepared pursuant to Section 21155.2 of the California Public Resources Code (PRC).

Project Title: 1111 South Hill Street Project

Project Location: 1101–1115 South Hill Street and 206–210 West 11th Street
Los Angeles, CA 90015

Lead Agency: City of Los Angeles Department of City Planning
200 North Spring Street, Room 621
Los Angeles, CA 90012

City Staff Contact: Debbie Lawrence, AICP, Senior City Planner
(213) 978-1163

Project Applicant: Crown 1111, LLC
P.O. Box 5738
Beverly Hills, CA 90209

1.1 Project Description Summary

The subject of this SCEA is a proposed mixed-use development known as the 1111 South Hill Street Project (project). The project site is approximately 0.63-acres and is located within the Central City Community Plan area of the City of Los Angeles (City). The project site is bounded by an alley to the west, South Hill Street to the east, West 11th Street to the north, and a surface parking lot and commercial building to the south. The project site is surrounded by various land uses, including residences, hotels, offices, restaurants, retail uses, parking structures, and surface parking lots. The project site is currently developed with a 2-story warehouse building that has been vacant since approximately 2013, when the building was last occupied by warehouse uses. There are three non-protected street trees on the South Hill Street sidewalk fronting the project site, and three non-protected street trees are present along the West 11th Street sidewalk according to the Tree Evaluation Report prepared by PSOMAS, dated August 6, 2021.

The project would remove the existing vacant warehouse on the Project Site and one street tree on the South Hill Street sidewalk and construct a 40-story mixed-use building with Transient Occupancy Residential Structure (TORS), residential, and commercial uses. The project will include one level of subterranean parking, one level of ground floor commercial uses, three levels of above ground parking, eight levels of TORS units located on levels 6 through 13, and residential condominium units located on levels 14 through 38.

The project would provide up to 319 multi-family residential dwelling units, up to 160 TORS units and up to 3,429 square feet (sf) of ground floor commercial uses. It is anticipated that the residential unit count would comprise 24 studio units, 144 one-bedroom units, 127 two-bedroom units, 20 three-bedroom units, and 4 three-bedroom penthouse units. The ground floor commercial uses would consist of restaurant uses. Overall, the proposed high-rise building would comprise up to 491,977 sf of floor area and would reach a maximum height of 520 feet above ground level, when accounting for rooftop structures. When the project is complete, the post-dedicated lot area would be 26,683 sf (0.61 acres).

Open space and amenities for the project's residential uses would include private balconies, landscaped amenity terraces, and recreational amenities. The project would provide parking pursuant to the Los Angeles Municipal Code (LAMC) for up to 436 vehicle parking spaces, including 325 residential parking spaces and 111 parking spaces for the TORS use. The project would provide parking within three stories of above-grade automated parking with stackers and overhead lifts with valet in one subterranean level. In addition, the project would provide bicycle parking pursuant to the LAMC, including up to 347 bicycle parking spaces (up to 56 short-term and 291 long-term).

The City of Los Angeles has the principal responsibility for approving the project. Approvals required for development of the project may include, but are not limited to, the following:

- Per LAMC Section 14.5.6 (B), a Transfer of Floor Area Rights ("TFAR") of Greater than 50,000 Square Feet from the Los Angeles Convention Center ("Donor Site") to allow an increase of up to 327,487 square feet of floor area for a total of 491,977 square feet of floor area (11.34:1 FAR) in lieu of the maximum permitted 6:1 FAR;

- Per LAMC Section 12.24.W.24.(e), a Conditional Use Permit to allow the proposed 160 TORS units (dwelling units with kitchens, operating as a commercial hotel with occupancy for 30 days or less) in the C2 Zone;

- Per LAMC Section 12.24.S, as part of the Conditional Use Permit approval for TORS, to allow a 20% reduction in the required automobile parking for the TORS units (prior to accounting for parking reductions from bicycle credits).

- Per LAMC Section 12.21.G.3.(a)(2), a Director's Decision to allow a 10 percent increase in the qualifying area of recreation rooms (indoor open space) for a maximum 35 percent of the total required usable open space.

- Per LAMC Section 12.24.W.1., a Main Conditional Use Permit to allow the on-site sales and dispensing of a full line of alcohol in conjunction with the operation of 160 TORS units (dwelling units with kitchens, operating as a commercial hotel with occupancy for 30 days or less) and ground floor restaurants;

- Per LAMC Section 16.05, approval of Site Plan Review;

- Per LAMC Section 17.15 a Vesting Tentative Tract Map (VTT-82178) to subdivide the Project Site into one Master Ground Lot and nine Airspace Lots for residential and commercial condominium purposes, including the following:
  - Required 2-foot wide dedication on 11th Street proposed to be limited to a maximum height of 15 feet above sidewalk grade and 10 feet below sidewalk grade;
  - Required 3-foot wide easement on 11th Street proposed to be limited to a maximum height of 15 feet above sidewalk grade and 5 feet below sidewalk grade;
  - Required 20-foot radius corner cut dedication at Hill Street and 11th Street proposed to be limited to a maximum height of 15 feet above sidewalk grade and 10 feet below sidewalk grade.
  - The Applicant also requests that the proposed Haul Route be approved concurrent with the Vesting Tentative Tract Map.
- Construction permits including: building, demolition, excavation, shoring, grading, foundation and removal of an existing street tree
- Pursuant to LAMC Section 41.40, approval of a Board of Police Commissioners Permit for a continuous concrete pour occurring outside of 9:00 p.m. and 7:00 a.m.;
- Adoption of the SCEA; and
- Other discretionary and ministerial permits and approvals that may be deemed necessary.

1.2 Background Information on Senate Bill 375 and the SCEA

The State of California adopted Senate Bill 375 (SB 375), also known as "The Sustainable Communities and Climate Protection Act of 2008," which outlines growth strategies that better integrate regional land use and transportation planning and that help meet the State of California's greenhouse gas (GHG) emissions reduction mandates. SB 375 requires the State's 18 metropolitan planning organizations to incorporate a "sustainable communities strategy" (SCS) into the regional transportation plans to achieve their respective region's greenhouse gas emission reduction targets set by the California Air Resources Board (CARB). Correspondingly, SB 375 provides various California Environmental Quality Act (CEQA) streamlining provisions for projects that are consistent with an adopted applicable SCS and meet certain objective criteria; one of such CEQA streamlining tools is the SCEA.

The Southern California Association of Governments (SCAG) is the metropolitan planning organization for the County of Los Angeles (along with the Counties of Imperial, San Bernardino, Riverside, Orange, and Ventura). On September 3, 2020, the SCAG's Regional Council formally adopted an update to the 2016-2040 RTP/SCS; entitled (2020–2045 Regional Transportation

Plan/Sustainable Communities Strategy) (SCAG 2020–2045 RTP/SCS) also known as the Connect SoCal.

For the SCAG region, CARB has revised its long-range GHG emissions reduction target at 19 percent below 2005 per capita emissions levels by 2035, which the 2020-2045 RTP/SCS intends to meet or exceed. On October 30, 2020, CARB officially determined that the 2020-2045 RTP/SCS would achieve CARB's 2035 GHG emission reduction target.

SB 375 allows the City, acting as lead agency, to prepare a SCEA as the environmental CEQA Clearance for "transit priority projects" (as described below) that are consistent with SCAG's 2020-2045 RTP/SCS.

1.3 Transit Priority Project Criteria

SB 375 provides CEQA streamlining benefits to qualifying transit priority projects (TPPs). For purposes of projects in the SCAG region, a qualifying TPP is a project that meets the following four criteria (see PRC Section 21155 (a) and (b)):

1. Is consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in the SCAG 2020-2045 RTP/SCS;

2. Contains at least 50 percent residential use, based on total building square footage and, if the project contains between 26 percent and 50 percent nonresidential uses, a floor area ratio of not less than 0.75;

3. Provides a minimum net density of at least 20 dwelling units per acre; and

4. Is within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan.

1.4 SCEA Process and Streamlining Provisions

Qualifying TPPs that have incorporated all feasible mitigation measures, performance standards or criteria set forth in the prior applicable EIR (SCAG's 2020-2045 RTP/SCS Program EIR) and that are determined to not result in significant and unavoidable environmental impacts may be approved with a SCEA. The specific substantive and procedural requirements for the approval of a SCEA include the following:

1. An initial study shall be prepared for a SCEA to identify all significant impacts or potentially significant impacts of the TPP, except for the following:

    a. Growth-inducing impacts, and

    b. Project-specific or cumulative impacts from cars and light trucks on global warming or the regional transportation network.

Note: All relevant and feasible 2020-2045 RTP/SCS Program EIR mitigation measures shall be incorporated into the project prior to conducting the initial study analysis.

2. The initial study shall identify any cumulative impacts that have been adequately addressed and mitigated in a prior applicable certified EIR. Where the lead agency determines the impact has been adequately addressed and mitigated, the impact shall not be cumulatively considerable.

3. The SCEA shall contain mitigation measures that either avoid or mitigate to a level of insignificance all potentially significant or significant effects of the project required to be identified in the initial study.

4. A draft of the SCEA shall be circulated for a public comment period not less than 30 days, and the lead agency shall consider all comments received prior to acting on the SCEA.

5. The SCEA may be approved by the lead agency after the lead agency's legislative body conducts a public hearing, reviews comments received, and finds the following:

    a. All potentially significant or significant effects required to be identified in the initial study have been identified and analyzed, and

    b. With respect to each significant effect on the environment required to be identified in the initial study, either of the following apply:

        i. Changes or alterations have been required in or incorporated into the project that avoid or mitigate the significant effects to a level of insignificance.

        ii. Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.

6. The lead agency's decision to review and approve a TPP with a SCEA shall be reviewed under the substantial evidence standard.

1.5 Required Findings

The City of Los Angeles finds, based on the information contained in Section 2 (Project Description), Section 3 (Sustainable Communities Environmental Assessment Criteria), Section 4 (Incorporation of 2020-2045 RTP/SCS Program EIR Mitigation Measures), Section 5 (SCEA Initial Study Checklist), and Section 6 (Sustainable Communities Environmental Impact Analysis) of this document, the City finds that preparation of a SCEA in accordance with Public Resources Code Section 21155.2(b) is appropriate for the project for the following reasons:

- The project is consistent with the general use designations, density, building intensity, and applicable policies specified for the area of the Project Sites in the 2020-2045 RTP/SCS

RTP/SCS) prepared by SCAG, which is the metropolitan planning organization for the City.

- The State Air Resources Board, pursuant to subparagraph (H) of paragraph (2) of subdivision (b) of Section 65080 of the Government Code, has accepted SCAG's determination that the sustainable communities strategy adopted by SCAG in the 2020-2045 RTP/SCS would, if implemented, achieve the greenhouse gas emission reduction targets.

- The project qualifies as a transit priority project pursuant to Public Resources Code Section 21155 in that the project contains more than 50 percent residential use; provides a minimum net density greater than 20 units an acre; and is within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan;

- The project is a residential or mixed-use project as defined by Public Resources Code Section 21159.28(d);

- The project incorporates all feasible mitigation measures, performance standards, or criteria set forth in the prior environmental reports and adopted findings made pursuant to Public Resources Code Section 21081, including the 2020-2045 RTP/SCS Program Environmental Impact Report (Program EIR);

- All potentially significant or significant effects required to be identified and analyzed pursuant to the California Environmental Quality Act (CEQA) in an initial study have been identified and analyzed in an initial study; and

- As outlined in detail in Section 5 (SCEA Initial Study Checklist) and Section 6 (Sustainable Communities Environmental Impact Analysis) changes or alterations have been required in or incorporated into the project that avoid or mitigate the significant effects to a level of less than significant.

1.6 Organization of the SCEA

Based on the information presented above, the SCEA for the project is organized as follows:

- **Section 1. Introduction:** This section provides introductory information about the project and background information regarding SB 375, lists the TPP criteria, and describes the required content of the SCEA.

- **Section 2. Project Description:** This section provides a detailed description of the environmental setting and the project, including project characteristics and environmental setting.

- **Section 3. Sustainable Communities Environmental Assessment Criteria:** This section includes a discussion of the project's consistency with the TPP criteria listed above and

demonstrates that the project satisfies all necessary criteria for approval of a SCEA as set forth in California PRC Sections 21155.2, and 21159.28(a).

- **Section 4. Incorporation of 2020-2045 RTP/SCS Program EIR Mitigation Measures** : This section also identifies all of the mitigation measures contained in the Mitigation Monitoring and Reporting Program (MMRP) for SCAG's 2020-2045 RTP/SCS Program EIR and a discussion of the applicability of the mitigation measures to the project.

- **Section 5. SCEA Initial Study Checklist:** This section contains the completed Initial Study Checklist and assesses the significant level under each environmental impact category.

- **Section 6. Sustainable Communities Environmental Impact Analysis:** Each environmental issue identified in the Initial Study Checklist contains an assessment and discussion of project-specific and cumulative impacts associated with each subject area. Where the evaluation identifies potentially significant effects, as identified on the Checklist, mitigation measures are provided to reduce such impacts to less-than-significant levels.

- **Appendices:** Includes various documents, technical reports, and information used in preparation of the SCEA and can be found in the case file for ENV-2018-2857-SCEA at the Department of City Planning.

SECTION 2

Project Description

2.1 Introduction

The proposed 1111 South Hill Street Project ("project") would develop a 40-story mixed-use building on an approximately 0.63-acre site (project site) located within the South Park area of the Central City Community Plan ("Community Plan") area of the City of Los Angeles (City).

The project site is currently developed with an 81,993 square foot warehouse that has been vacant since approximately 2013. The project proposes to remove the existing warehouse and construct up to 319 multi-family residential units, up to 3,429 square feet (sf) of ground floor commercial uses, up to 160 units designated as Transient Occupancy Residential Structure (TORS) units[1], up to 436 vehicle parking spaces, and up to 347 bicycle spaces.

2.2 Project Location and Surrounding Uses

As shown on Figure 2-1, the project site is in downtown Los Angeles in the South Park neighborhood. As shown on Figure 2-2, the project site is bounded by an alley to the northwest, South Hill Street to the southeast, West 11th Street to the northeast, and a surface parking lot and commercial building to the southwest. The project site is served by a network of regional transportation facilities providing connectivity to the larger metropolitan area. Primary regional access is provided by Interstate (I) 10 and I-110. I-10 runs east-west and is approximately 0.5 mile south of the project site. I-110 runs north-south and is approximately 0.7 mile west of the project site. Major arterials serving the project site vicinity include 9th Street, Olympic Boulevard, and Pico Boulevard. South Hill Street and West 11th Street provide direct access to the project site.

[1] Per LAMC Section 12.03 a Transient Occupancy Residential Structure (TORS) is, "A residential building designed or used for one or more dwelling units or a combination of three or more dwelling units and not more than five guest rooms or suites of rooms wherein occupancy, by any person by reason of concession, permit, right of access, license, or other agreement is for a period of 30 consecutive days or less, counting portions of calendar days as full days." The 160 TORS units, will be operated as a commercial hotel as further described and delineated herein. Specifically, the TORS units will operate as extended-stay units with kitchens, operating as a commercial hotel. Because the units include kitchens, according to the LAMC they are considered dwelling units. References to "TORS" or "TORS units" throughout this SCEA are to the extended-stay commercial hotel rooms with kitchens."

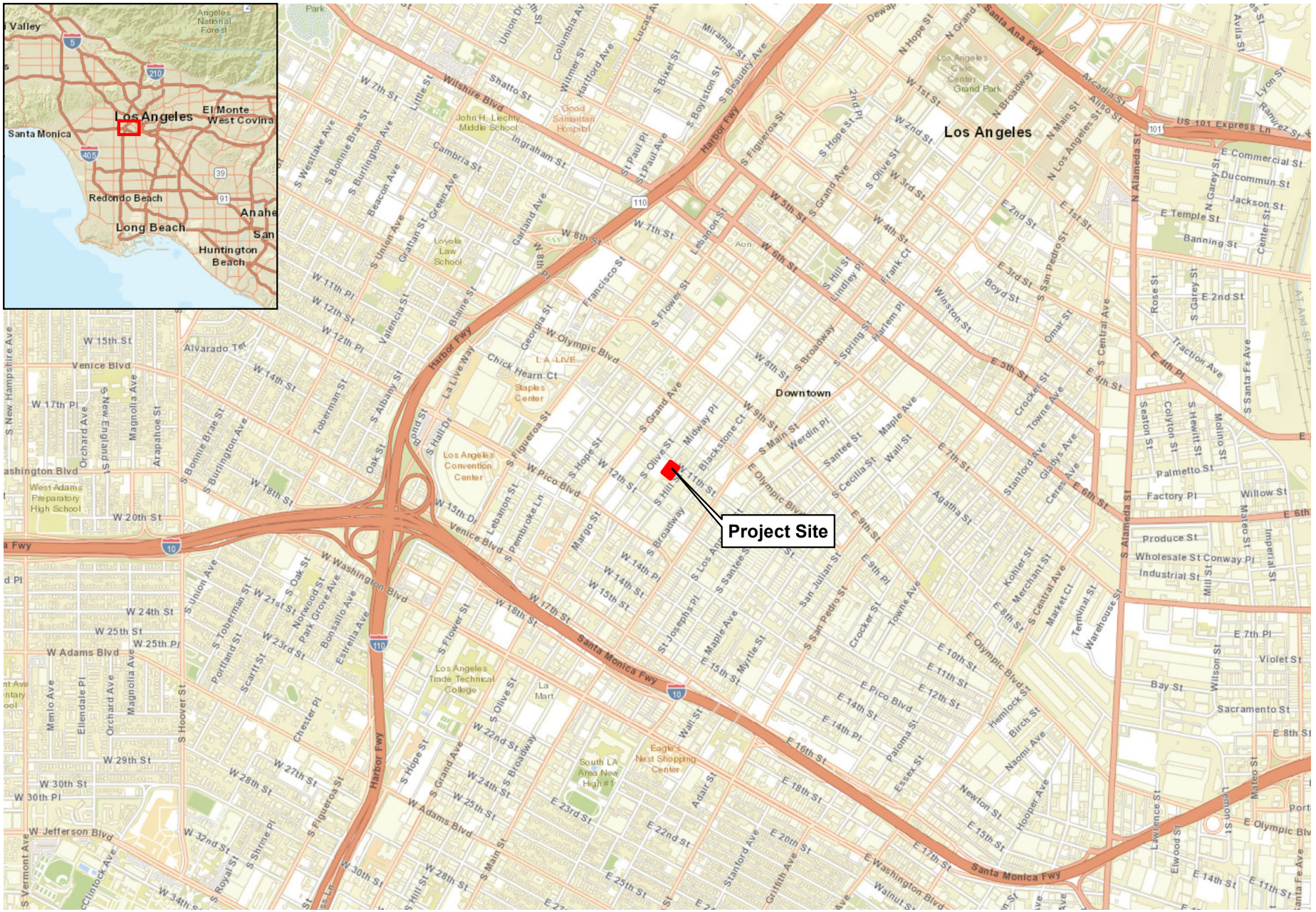

Figure 2-1
Project Location Map

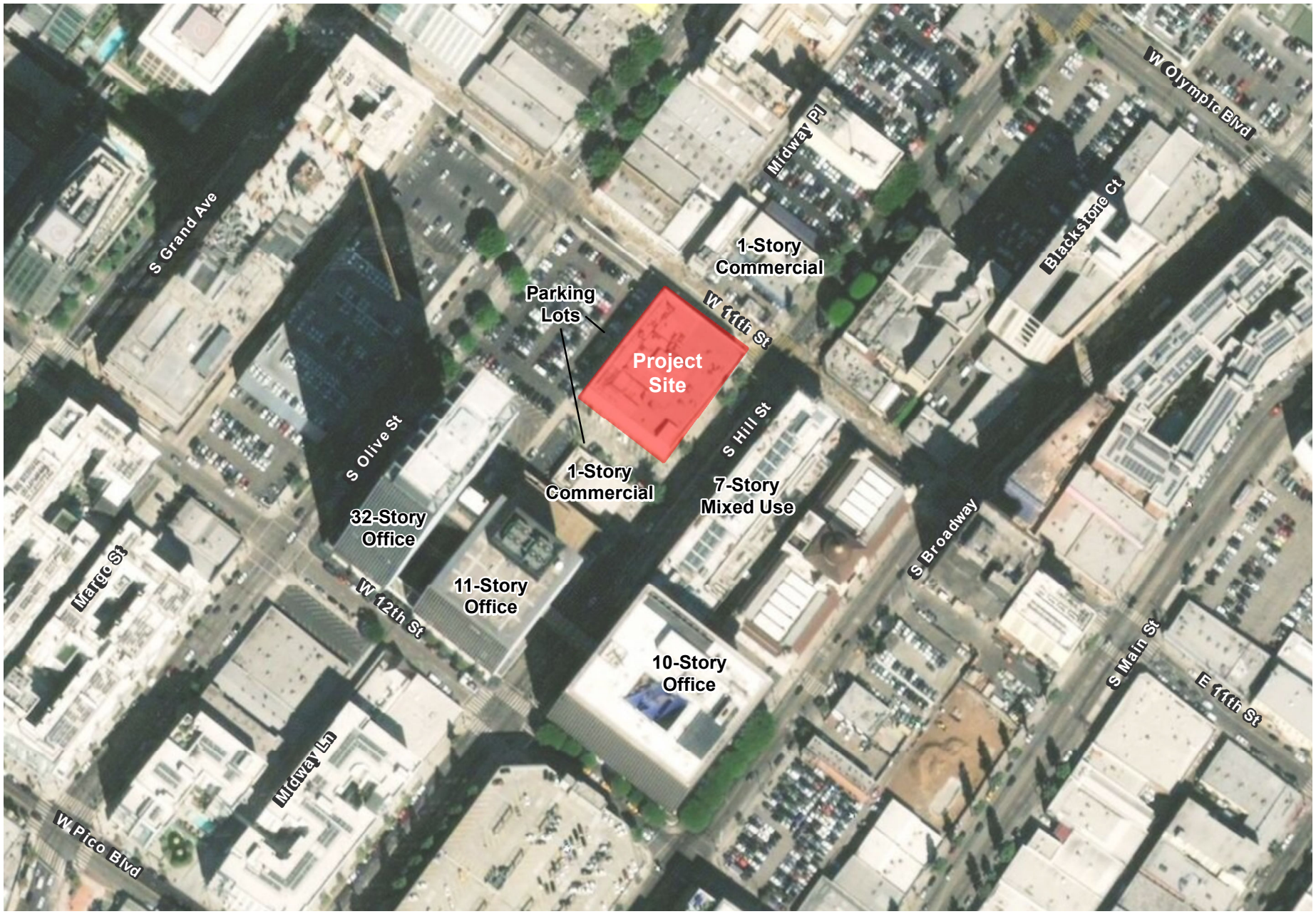

Figure 2-2
Aerial Photograph of the Project Vicinity

The D Line provides a connection between downtown Los Angeles and mid-Wilshire/Koreatown.[2] The project site is also served by multiple bus lines via stations at Olive Street/11th Street (serving the 14/37, 70, 71, 76, 78/79/378, and 96 lines), Hill Street/12th Street (serving the 83, 90/91, 94, Commuter Express 409, and Dash downtown D lines), and Broadway/11th Street (serving the 2/302, 4, and 745 lines). The closest Metro bike share stations are located at 12th Street and Hill Street (129 West 12th Street) and at Grand Avenue and 14th Street (1375 South Grand Avenue). The project site is also immediately adjacent to the future downtown LA Streetcar route along 11th Street. The downtown LA Streetcar is a planned 4-mile route that would provide connections to downtown neighborhoods, destinations, and regional transit options. More specifically, the downtown LA Streetcar will connect riders with the South Park, Financial District, and Historic Broadway neighborhoods; Grand Park and the Civic Center; the Fashion District and the Convention Center; Staples Center; and LA Live. It will also serve as a connector to key local and regional bus and rail lines.

2.3 Site Background and Existing Site Conditions

Project Site

The project site consists of two lots (APN 5139-019-022) and encompasses approximately 27,415 square-feet of lot area (0.63 acres) located at 1101-1115 South Hill Street and 206-210 West 11th Street, Los Angeles 90015. An existing 16-foot wide alley runs north/south along on the project site's westerly edge with an entrance from 11th Street. The project site is entirely located within the South Park area of the Central City Community Plan and has a General Plan Land Use designation of Regional Center Commercial. The project site is also located within the City Center Redevelopment Project Area and Council District 14, Councilmember Kevin de Leon.

The project site is in an urban setting of varied development. As shown on Figure 2-2, the project site is currently developed with a 2-story warehouse building constructed in 1954. The building is constructed of reinforced concrete with stucco cladding, has a boxy massing, and is built to the property line at the southwest intersection of South Hill Street and West 11th Street. The building has a total area of 81,993 sf and has been vacant since approximately 2013, when the building was last occupied by warehouse uses. There are three non-protected street trees on the South Hill Street sidewalk fronting the project site, and three non-protected street trees are present along the West 11th Street sidewalk.

Surrounding Use

The South Park neighborhood includes a diverse mix of land uses, including high- and mid-rise office buildings, residential buildings, hotels, retail and restaurant uses, museums, night clubs, theaters, cultural districts, warehouses, and light industrial uses. As shown on Figure 2-2, the

[2] Currently under construction, is the Metro Regional Connector Project, a 1.9-mile alignment which will extend from the Little Tokyo/Arts District Station to the 7th Street/Metro Center Station in downtown Los Angeles, allowing passengers to transfer to the Metro A, B, D, and E Lines, bypassing Union Station. It will include three new stations located at 1st Street/Central Avenue, 2nd Street/Broadway and 2nd Place/Hope Street. It is forecasted to open in 2022. https://www.metro.net/projects/connector/ July 19, 2021.

project site is surrounded by various land uses, including residences, hotels, offices, restaurants, retail uses, parking structures, and surface parking lots. To the north of the project site, across West 11th Street, there are two one-story commercial buildings and a surface parking lot. The project site is bordered to the southwest by a surface parking lot and a one-story commercial building (Bank of America); farther to the southwest on the same block is a 12-story office building (Eleven49) adjacent to a 32-story office building (USC Tower). Across South Hill Street to the southeast is a recently constructed seven-story mixed-use building (Axis Apartments) and historic restoration of the Herald Examiner Building to be a mixed-used property for Arizona State University's satellite School of Journalism, creative office suites, retail shops and restaurants and a 10-story Public Works office building. An alley abuts the project site to the northwest, across from which is a surface parking lot.

Surrounding Transit Services

The project site is less than 0.3 mile northeast of the Metro Rail Pico Station, which serves the A Line (formally Blue), and E Line (formally Expo); approximately 0.7 mile southeast of the 7th/Metro Center Station, which serves the A Line, B Line (formally Red), D line (formally Purple), and E Line; and approximately 0.8 mile south of the Metro Pershing Square Station, which serves the B and D lines. The A Line provides rail service between the city of Long Beach and downtown Los Angeles with connecting service to the Metro C Line (formally Green) (serving Norwalk, Redondo Beach, and the Los Angeles International Airport via shuttle). The E Line provides rail service between downtown Los Angeles, Culver City, and Santa Monica. The Metro B Line provides service between downtown Los Angeles and Hollywood/North Hollywood, with connecting service to the Metro G line (formally Orange) (serving the west Valley and Chatsworth).

2.4 Planning and Zoning

The project site's land use designation under the Central City Community Plan—i.e., the Land Use Element of the City's General Plan—is Regional Center Commercial[3]. The Regional Center Commercial designation allows for uses such as corporate and professional offices, retail commercial malls, government buildings, major health facilities, major entertainment and cultural facilities, and supporting services, as well as high density residential uses.

The project site is zoned by the Los Angeles Municipal Code (LAMC) as C2-4D-O (Commercial, Height District 4 with Development "D" Limitation, Oil Drilling Supplemental Use District). The commercial zones permit a wide array of land uses, such as retail stores, offices, hotels, schools, parks, and theaters. The C2 Zone allows any land use permitted in the C1 and C1.5 (Limited Commercial) Zones, which in turn allow uses permitted in the R3 and R4 (Multiple Residential) zones.[4] Height District 4 within the C2 Zone does not impose any height limit and normally

[3] City of Los Angeles, Central City Community Plan,2003, https://planning.lacity.org/plans-policies/community-plan-area/central-city, Accessed: December 20, 2021.
City of Los Angeles. Framework Element of the General Plan. Available: https://planning.lacity.org/cwd/framwk/chapters/03/03205.htm. Accessed: December 20, 2021.

[4] LAMC Section 12.22 A.18 also allows any use permitted in the R5 zone for mixed-use projects in commercial zones within the Central City Community Plan Area.

establishes a maximum floor area ratio (FAR) of 13:1.[5] However, the maximum permitted FAR on the project site is restricted to 6:1 by the "D" Limitation unless additional floor area is permitted through a Transfer of Floor Area Rights (TFAR).[6] With approved TFAR, the project qualifies for a 13:1 FAR. The project site is within a City-designated Transit Priority Area (TPA) as defined by Public Resources Code Section 21099.[7] As a Transit Area Mixed Use Project within a TPA, the project is allowed to calculate FAR based on the area contained within the centerlines of South Hill Street and West 11th Street and the adjacent alley to the west. The project site is located within the oil drilling supplemental use district, indicating that oil drilling is allowed pursuant to LAMC Section 13.01.

The project site is also located in the Los Angeles State Enterprise Zone Program Area (ZI-2374), the Greater Downtown Housing Incentive Area (ZI-2385), the City Center Redevelopment Project Area, the Downtown Streetcar zone (ZI-2450), and Council District 14, Councilmember Kevin de Leon.

2.5 Description of the Project

Project Overview

The project would remove the existing vacant warehouse on the Project Site and construct a 40-story (520-foot) mixed-use building consisting of 319 residential condominium units; 160 TORS units and approximately 3,429 sf of ground floor commercial accommodating two restaurants. The project will include one level of subterranean parking, one level of ground floor commercial uses, three levels of above ground parking, eight levels of TORS units located on levels 6 through 13, and residential condominium units located on levels 14 through 38.

The project would also include a landscaped pool amenity deck on level 5, and a landscaped amenity roof deck on level 40. Indoor multi-purpose recreational facilities would be located on levels 5, 6, and 39. As shown in Table 2-1, the project would provide up to 319 multi-family residential units, up to 160 TORS units and up to 3,429 sf of ground floor commercial uses. It is anticipated that the residential unit count would comprise 24 studio units, 144 one-bedroom units, 127 two-bedroom units, 20 three-bedroom units, and 4 three-bedroom penthouse units. The ground floor includes 3,429 sf of restaurant uses. Overall, the proposed high-rise building would comprise up to 491,977 sf of floor area and would reach a maximum height of 520 feet above ground level, when accounting for rooftop structures.

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5 FAR expresses the relationship between the amount of useable floor area permitted in a building (or buildings) and the area of the lot on which the building stands. It is obtained by dividing the floor area of a building as defined by LAMC Section 12.03 by the buildable area of the lot.

6 Pursuant to Ordinance No. 181,574 and LAMC Section 14.5.6 B., a TFAR allows the transfer of unused allowable floor area from a donor site to a receiver site for projects involving transfers of 50,000 sf or more.

7 City of Los Angeles Department of City Planning ZI NO. 2452, Transit Priority Areas (TPAs). A "Transit priority area" means an area within one-half mile of a major transit stop that is existing or planned. Under Section 21064.3 of the Public Resources Code (PRC), a "major transit stop" includes among other criteria a site containing an existing rail transit station, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

TABLE 2-1. SUMMARY OF PROPOSED FLOOR AREA

Land Use	Floor Area
Residential	373,480 sf (319 du)
TORS	115,068 sf (160 TORS units)
Commercial	3,429 sf
Total	491,977 sf
sf = square feet du = dwelling units	

Figures 2-3 through 2-9 provide conceptual renderings of the project and representative floor plans for the ground floor, residential, TORS units and amenity levels. These floor plans are meant to be representative of the basic components of the project; interior floor plan layouts may change as the project design is further developed.

Source: MVE and Koichi Takada Architects 2021

Figure 2-3
Rendering of Project on Hill Street Facing Northwest
1111 South Hill Street Project

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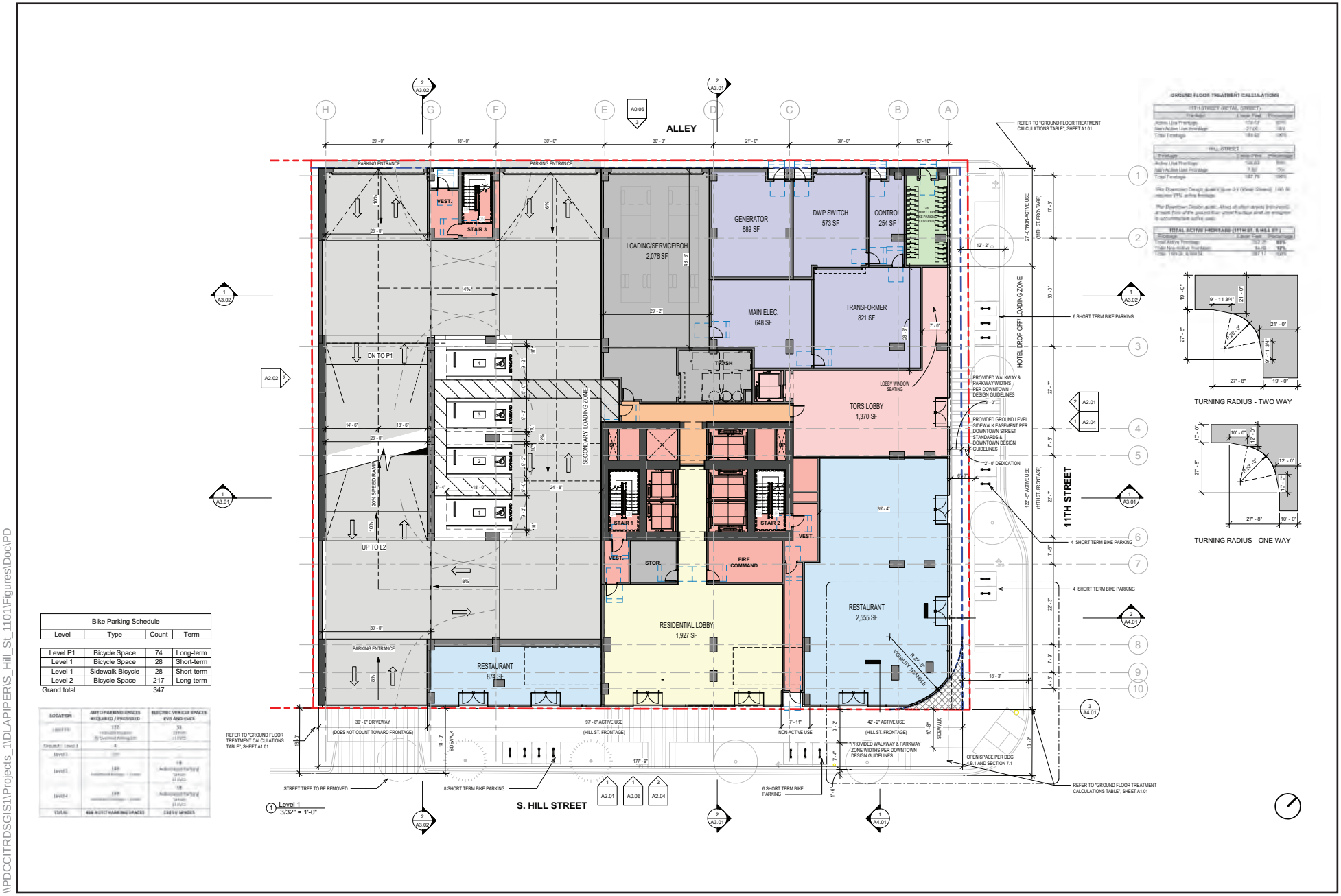
Source: MVE and Koichi Takada Architects 2021

Figure 2-4
Conceptual Rendering—Street Level
1111 South Hill Street Project



Bike Parking Schedule			
Level	Type	Count	Term
Level P1	Bicycle Space	74	Long-term
Level 1	Bicycle Space	28	Short-term
Level 1	Sidewalk Bicycle	28	Short-term
Level 2	Bicycle Space	217	Long-term
Grand total		347	

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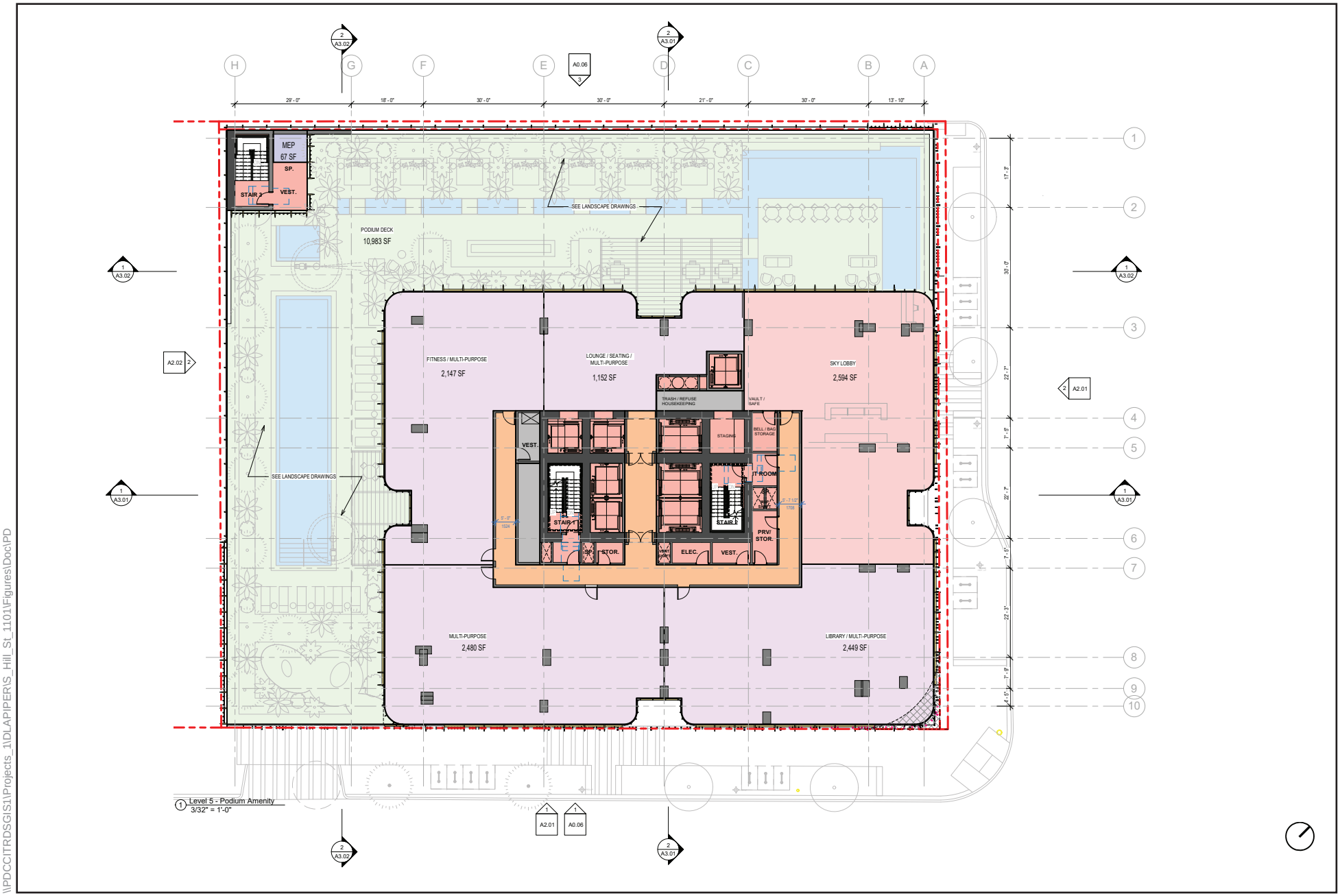
Source: MVE and Koichi Takada Architects 2020

Figure 2-5
Ground Floor Level
1111 South Hill Street Project



Source: MVE and Koichi Takada Architects 2020

Figure 2-6
Level 5, Podium Amenity Deck
1111 South Hill Street Project

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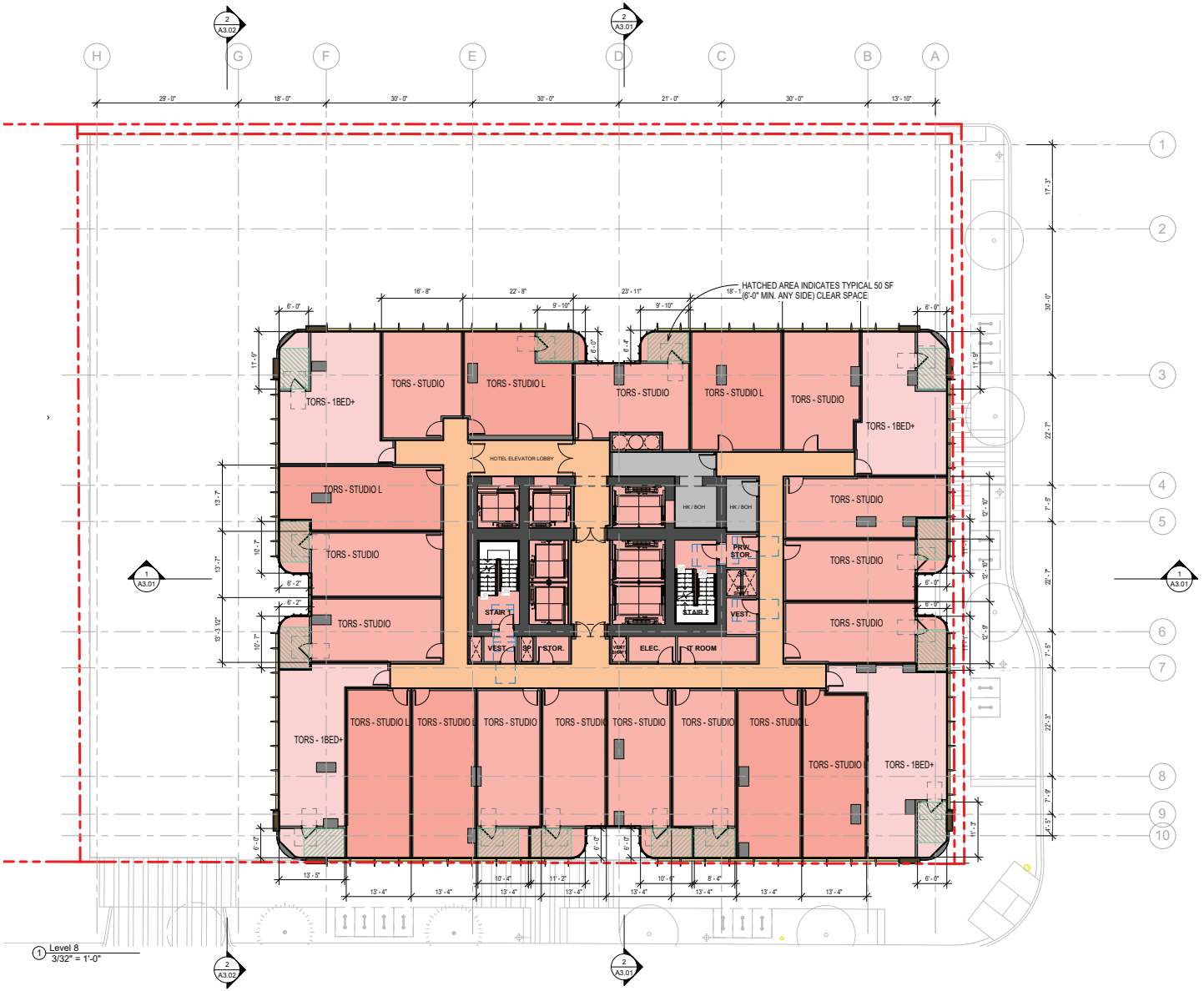

Source: MVE and Koichi Takada Architects 2021

Figure 2-7
Floor Plan-Levels 8-11 (Typical TORS)
1111 South Hill Street Project

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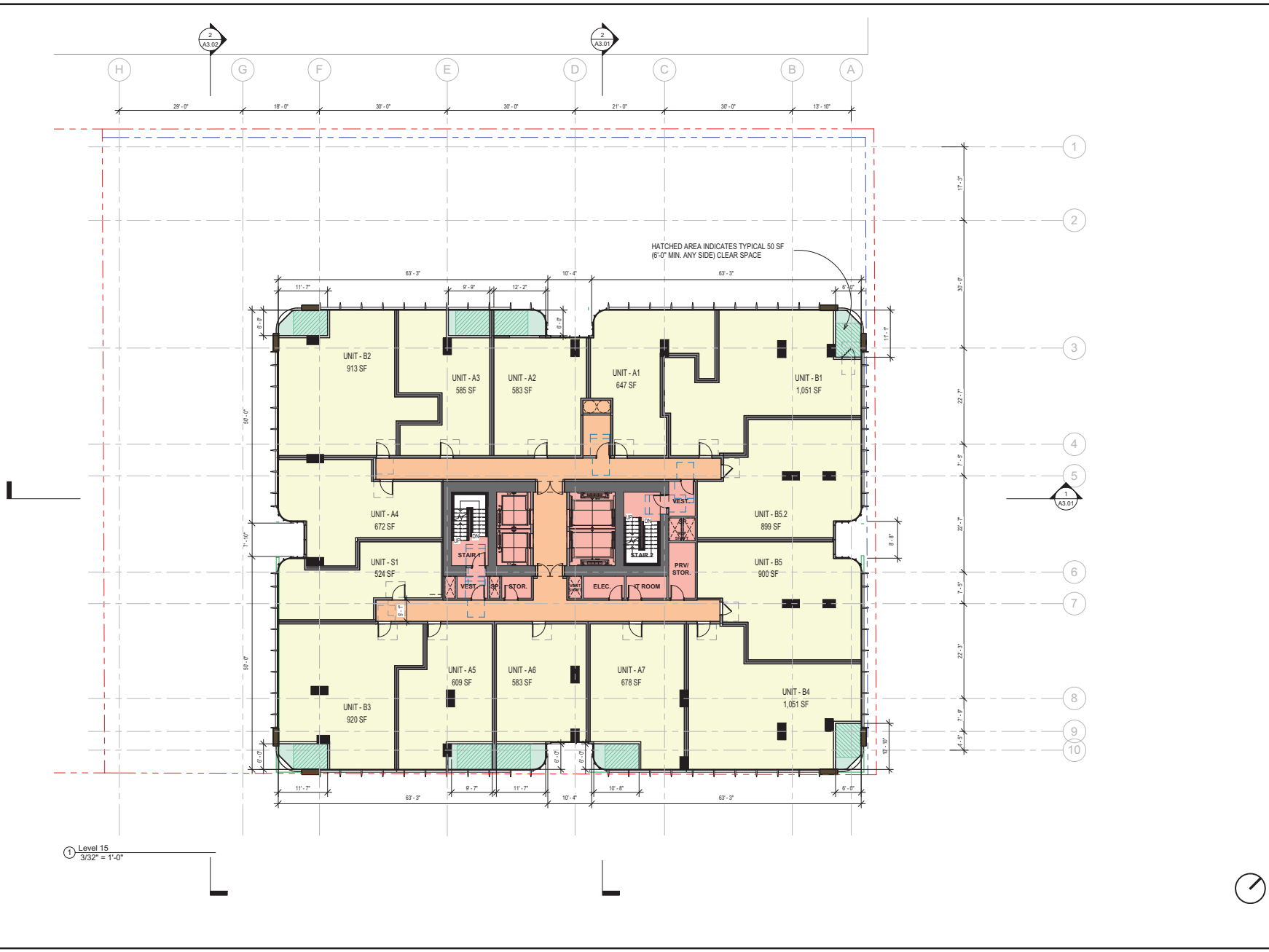
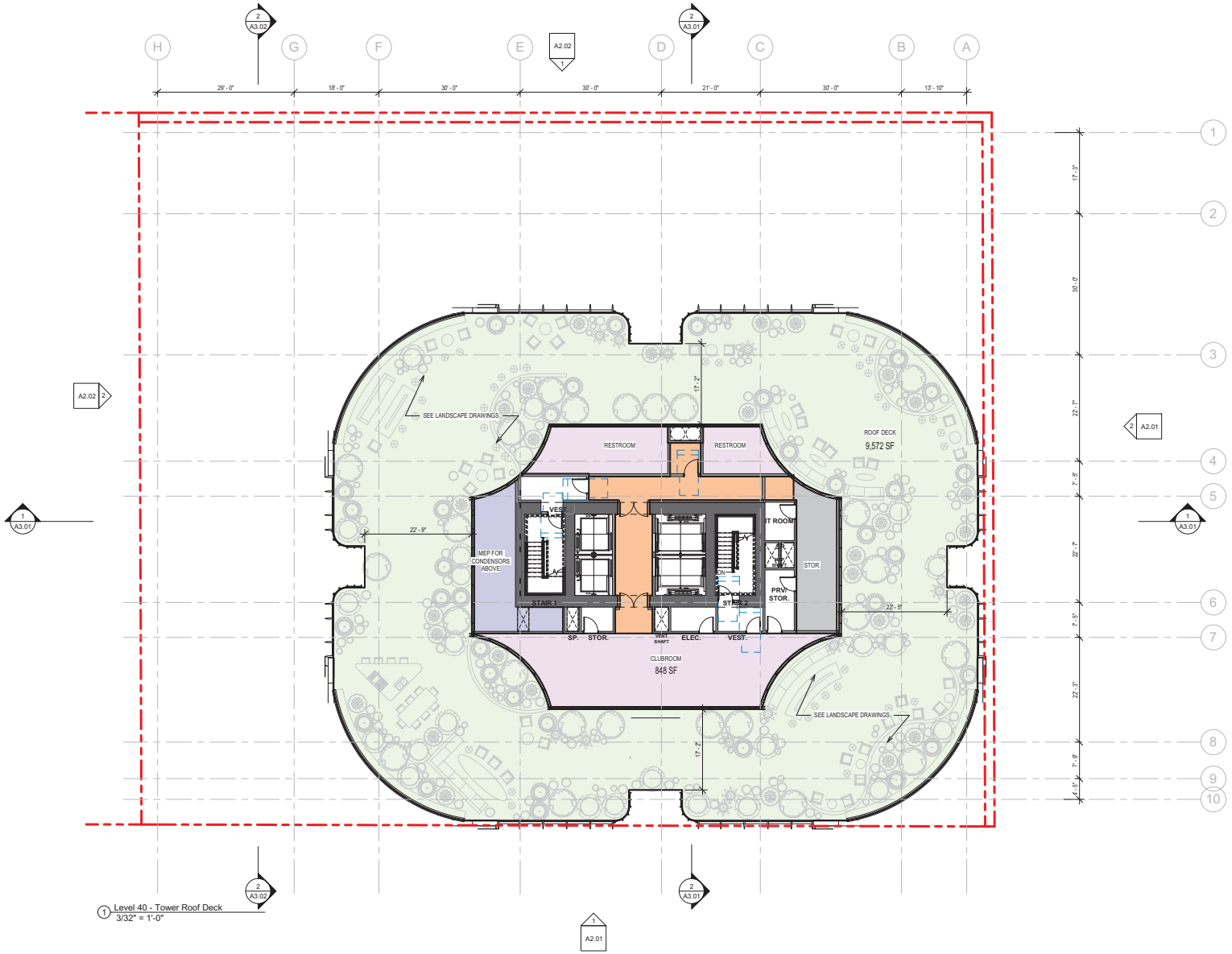


Source: MVE and Koichi Takada Architects 2021

Figure 2-8
Floor Plan - Levels 15-32 (Typical Residential)
1111 South Hill Street Project



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Source: MVE and Koichi Takada Architects 2021

Figure 2-9
Roof Deck
1111 South Hill Street Project

The project would provide parking pursuant to the Los Angeles Municipal Code (LAMC) for up to 436 vehicle parking spaces, including 325 residential parking spaces and 111 TORS units parking spaces.

The project would provide parking within three stories of above grade automated parking with stackers and overhead lifts with valet in one subterranean level. The project would provide 131 Electric Vehicle Ready Parking Spaces including 44 Electric Vehicle Charging Stations.

In addition, the project would provide bike parking pursuant to the LAMC, including up to 347 bicycle parking spaces (up to 56 short-term and 291 long-term) within the one level of subterranean parking, the ground level, and the second level of above grade parking.

Building Design

The project draws inspiration from the California redwoods and features a contemporary, organic architectural style that aims to integrate nature into the built environment, as seen in Figures 2-3 and 2-4. The design composition emphasizes pedestrian-scale features such as landscaping, an architectural awning, and ground-floor commercial/restaurant uses. Vertical and horizontal breaks along both street fronts reduce visual massing, provide articulation, and provide visual interest.

The residential lobby, TORS lobby, and two restaurant spaces along South Hill Street and West 11th Street would feature large glass storefronts, distinctive residential and commercial entrances, paving treatments, seating, and landscaping along both sidewalks. As discussed above, vehicle parking would be provided in one subterranean level below the ground floor, and three levels of parking above the ground floor. Starting at the 5th level, which would include a landscaped amenity deck, the building would separate from the podium to the tower form. The tower portion of the building would consist of TORS units on levels 6 through 13 and residential dwelling units on levels 14 through 38. Level 40 would feature an amenity deck. The tower would include balconies on the façade of the building, contributing to the articulation of the building. The tower rooftop (level 40) would feature amenities and landscaping. At each corner of the building, on the roof deck, the project would include four distinctive circular crown rooftop elements that would provide cascading landscaping. All common indoor open space will be available to both TORS guests and residential users.

The project would feature an awning design at the ground level. The awning would serve as a prominent architectural feature of the overall design that will provide shade and engage pedestrians at the street level. Above the awning, vertical timber-like beams will seamlessly extend vertically to screen vehicle parking on Levels three and four. Integrated with the beams, layers of opaque glazing, vertical fins, and landscaping will extend upwards, effectively screening the vehicles and preventing spillover lighting.

Open Space and Landscaping

Open space and amenities for the project's residential uses[8] would include private balconies, landscaped amenity terraces, and recreational amenities. Table 2-2 identifies the open space requirements for the project, pursuant to LAMC Section 12.21 G. Based on the maximum 319 dwelling units and 160 TORS units proposed, the project would be required to include 55,575 sf of open space. The project would fulfill this requirement by providing 55,706 sf of open space through a combination of 20,555 sf of common outdoor open space (open to the sky), 19,451 sf of common indoor open space, and 15,700 sf of private balconies. A total of 102 of the TORS units will have a private balcony, and 212 of the 319 residential condominiums will have a private balcony. Indoor amenity spaces would include a gym, a lounge rooms, game rooms, library, and multi-purpose rooms.

On levels 5 and 40, outdoor amenities such as a pool and roof deck would be provided, for a total of 20,555 sf. In addition, the project would be required to include one tree for every four dwelling units (including the TORS units), totaling 120 trees. The project proposes to provide 120 trees on the project site. There are six existing non-protected street trees surrounding the project: three existing Chinese Flame trees along 11th Street and three existing Canary Island Pine trees along South Hill Street. The project would remove one Canary Island Pine and would provide two new Canary Island Pine trees along South Hill Street, resulting in a total of seven street trees after completion of the project.

TABLE 2-2. OPEN SPACE REQUIREMENTS AND PROPOSED OPEN SPACE

Open Space Requirement[s]	Quantity (dwelling units)	Required Open Space (sf per unit)	Total Open Space (sf)
Residential Condominium Units			
Residential housing (Units with fewer than 3 habitable rooms)	68	100	6,800
Residential housing (Units with 3 habitable rooms)	227	125	28,375
Residential Housing (Units with more than 3 habitable rooms)	24	175	4,200
Total residential open space required	**319**		**39,375**
160 TORS Units			
(Units with fewer than 3 habitable rooms)	152	100 sf	15,200
(Units with 3 habitable rooms)	8	125 sf	1,000 sf
Total TORS units open space required	**160**		**16,200**
Total open space required			**55,575**
Proposed open space			55,706
Total indoor common open space			19,451[b]
Total outdoor common space			20,555

[8] Requirements for open space include TORS units, as these units are subject to LAMC open space requirements as these units, because they include kitchens, are considered "dwelling units", which are subject to open space requirements whereas "guest rooms" are not subject to this requirement.

Open Space Requirement[s]	Quantity (dwelling units)	Required Open Space (sf per unit)	Total Open Space (sf)
Private balconies			15,700 (levels 6 – 13 for TORS units 5,100 sf) and (levels 14 – 38 for residential units 10,600 sf)
[a] As per LAMC Section 12.03, "For the purpose of applying the open space requirements of Section 12.21 G., a kitchen as defined herein shall not be considered a habitable room." [b] The project is requesting Director's Determination per LAMC Section 12.21 G.3(a)(2), to allow a 10 percent increase in the qualifying area of recreation rooms (indoor open space) for a maximum 35 percent of the total required usable open space;			

Signage and Lighting

The project would include signage for the building, as well as signage for the commercial areas. All proposed signage would be designed in conformance to applicable requirements set forth in the LAMC, sign ordinance, and *Downtown Design Guide*.

New lighting would include signage, commercial accent lighting, wayfinding, balcony lighting, and security markings. Pedestrian areas, including pathways and entryways into the project, would be well lit for security. Project signage would include project identification signage, building and commercial tenant signage, general ground-level and wayfinding pedestrian signage, and security markings. The project does not propose digital signage, moving images, or off-site signage.

The project would incorporate street lighting along South Hill Street and West 11th Street, with street lighting on 11th Street to match the recently installed lights on 11th Street corridor for the MyFig project (Terry A. Hayes Associates Inc. 2013). Both South Hill Street and West 11th Street would also feature planted parkways, street trees, and seating elements to enhance the pedestrian visual experience. All new street and pedestrian lighting within the public right-of-way would comply with applicable LAMC requirements in order to maintain appropriate and safe light levels on sidewalks and roadways, while minimizing light and glare on adjacent properties.

Access and Circulation

Vehicular access to the parking garage would be provided at two ingress-egress points: one from the existing alley west of the building and one from South Hill Street. Currently, the alley west of the project site is one-way northbound. As the project proposes to widen the alley adjacent to the project site, the alley would become two-way. The locations of the access points are shown in the floor plan for the ground floor (see Figure 2-5). Additionally, a loading area would be located on the ground floor adjacent to the alley, with access via the alley off West 11th Street, and a pick-up/drop-off area would be provided on the north edge of the project site along 11th Street, replacing the existing metered parking spots. For valet trips related to TORS units visitors arriving at the project site would drop off and pick up their vehicles at the passenger loading zone on 11th Street.

Pedestrian access to ground-floor commercial uses would be directly available from sidewalk entrances along West 11th Street and South Hill Street. Pedestrian access to the residential units would be from the lobby entrance along South Hill Street. The project's TORS lobby entrance would be from West 11th Street.

Parking

The project would provide parking pursuant to the Los Angeles Municipal Code (LAMC) for up to 436 vehicle parking spaces, including 325 residential parking spaces and 111 TORS units parking spaces.

The project would provide parking within three stories of above grade automated parking (Levels 2 to 4) with stackers and overhead lifts with valet in one subterranean level. The project would provide 131 Electric Vehicle Ready Parking Spaces including 44 Electric Vehicle Charging Stations. Parking spaces within the ground floor and Level 2 will accommodate standard and ADA Accessible spaces. Parking spaces within the subterranean Level P1 will feature double-stackers and overhead parking lifts located above the drive aisles. Automobile parking within Levels 3 and 4 will feature a full automated parking lift system with access provided by automated parking lift/elevators located on Level 2.[9] In addition, the project would provide bicycle parking pursuant to the LAMC, including up to 347 bicycle parking spaces (up to 56 short-term and 291 long-term) within the one level of subterranean parking, the ground level, and the second level of above grade parking. The 291 long term bicycle parking spaces will be located on the subterranean parking level and level 2 of the above grade parking with a 100 square foot bicycle maintenance area on level 2. The 56 short term bicycle parking spaces will be located on the ground level; 28 covered-short term spaces will be located inside a dedicated bicycle room with a direct pedestrian access from West 11th Street, and 28 short-term bicycle spaces will be located in bicycle racks along the West 11th Street and South Hill Street frontages.

FAR, Setbacks, and Dedications

As discussed above under *Land Use and Zoning*, the maximum permitted FAR for the project site is restricted to 6:1 by the Development "D" Limitation unless additional floor area is granted through a TFAR, which would allow a FAR up to 13:1.

Without a TFAR, the maximum allowable floor area on the project site is 164,490 sf. The Applicant is requesting a TFAR of up to 327,487 sf of floor area from the Los Angeles Convention Center, located at 1201 South Figueroa Street, owned by the City of Los Angeles. As also discussed above, as a Transit Area Mixed Use Project nearby fixed rail, the project is allowed to calculate FAR based on the area contained within the centerlines of South Hill Street, West 11th Street, and the alley. The project site's pre-dedicated lot area is 27,415 sf (0.63 acres).

When the project is complete, the post-dedicated lot area would be 26,683 sf (0.61 acres). When measured to the centerline of the adjacent streets pursuant to LAMC Section 14.5.3, the buildable area for TFAR purposes is 43,385 sf. Thus, the project's proposed 491,977 sf of total floor area translates into a FAR of 11.34:1 after the TFAR of 327,487 sf. In addition, LAMC Section 14.5.9

[9] The project qualifies for a 15% reduction in residential and hotel (TORS) automobile parking spaces under the Municipal Code's bicycle parking reduction provision (LAMC Section 12.21 A.4 and 12.21 A.16). Additionally, the project is requesting a 20% reduction in automobile parking spaces related to the requested TORS Conditional Use Permit, pursuant to LAMC Section 12.24 S.

requires that an approved Transfer Plan provide a Public Benefits Payment to serve a public purpose.

TABLE 2-3. PROJECT SITE AREA AND FAR

Use	Size
Project Site Area	
Existing Site Lot Area (Pre-Dedicated)*	27,415 sf (0.63 acres)
Lot Area (Post-Dedicated)	26,683 sf (0.61 Acres)
Buildable Area (Per LAMC Section 14.5.3 Transit Area Mixed Use Project**	43,385 sf (0.99 Acres)
Floor Area	
By-right Floor Area (6:1 FAR) per Pre-Dedicated Lot Area	164,490 sf
By-right Floor Area (6:1 FAR) per LAMC Sec. 14.5.3 (For Transit Area Mixed-Use Project)	260,310 sf
Maximum Potential Floor Area (13:1 FAR) per LAMC Sec. 14.5.3 (For Transit Area Mixed-Use Project)	564,005 sf
Proposed Commercial (Restaurant)	3,429 sf (0.08 FAR)
Proposed TORS units	115,068 sf (2.65 FAR)
Proposed Residential Condominiums	373,480 sf (8.61 FAR)
Total Proposed Floor Area	491,977 sf (11.34 FAR)
* Assumes existing right-of-way easements are not part of Existing Site Lot Area. ** Per LAMC Section 14.5.3, buildable area is lot area plus area between centerlines of adjacent streets and alley.	

The project would provide a 2-foot-wide and varying dedication 10 feet below ground and 15 feet above ground for public right-of-way along 11th Street and a 3-foot-wide easement between 5 feet below ground level and 15 feet above ground for public sidewalk purposes along 11th Street. The project would also include a limited 2-foot-wide dedication for public right-of-way along the alley on the west side of the property.

Sustainability Features

The project is located within a Transit Priority Area (TPA). The project's location would promote the concentration of development in an urban location with extensive infrastructure and access to public transit facilities. The project would support pedestrian activity in the downtown Los Angeles area and would contribute to a land use pattern that addresses housing needs and reduces vehicle trips and air pollution by locating residential uses within an area that has public transit (with access to the Metro rail lines and existing regional bus service), employment opportunities, restaurants, and entertainment all within walking distance. Further, the project's inclusion of bicycle parking, as discussed above, would encourage the use of alternative modes of transportation.

Energy-saving features and sustainable design would be incorporated throughout the project. The project would be designed to meet the requirements of the Los Angeles Green Building Code, which incorporates the Cal Green and Title 24 Building Standards Code (CALGreen Code). In so doing the project would include features to enhance sustainability, including energy efficiency,

water efficiency, material conservation, and resource efficiency. In addition, the project would provide 131 Electric Vehicle Ready Parking Spaces including 44 Electric Vehicle Charging Stations.

2.6 Construction of the Project

To construct the subterranean parking levels, the project proposes excavation to a maximum depth of 45 feet below grade surface. The project would generate approximately 58,000 cubic yards of excavated soil that would require disposal.

Project construction is anticipated to commence in the fourth quarter of 2022 and continue over an approximately 36-month period before ending in the fourth quarter of 2025. Construction activities associated with the project would be undertaken in seven main steps: (1) demolition; 2) site preparation; 3) grading/excavation; 4) building foundation; 5) building construction; 6) asphalt paving; and 7) architectural coatings. The majority of the construction hours would normally occur in accordance with LAMC requirements, which prohibit construction between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, 6:00 p.m. and 8:00 a.m. on Saturday, and at any time on Sunday. The project site would be fenced during construction for security purposes with gate-controlled access. A one-day concrete pour for the building foundation would occur at the project site outside of the construction period of 7:00 a.m. and 9:00 p.m.

Haul Route

It is anticipated that haul truck trips would travel along South Hill Street to I-10. From there, two potential haul routes have been identified:[10]

- The I-10W, to I-110/SR-110N, to I-5N, to SR-126W, to the Chiquita Canyon Landfill at 29201 Henry Mayo Drive in Castaic; or

- I-10E, to I-605N, to the Nu-Way Arrow Landfill Arrow Highway at 270 Arrow Highway in Irwindale. As part of the project, a comprehensive Construction Traffic Management Plan and Truck Haul Route Program would be implemented during construction to minimize potential conflicts between construction activity and through traffic. The Construction Traffic Management Plan and Truck Haul Route Program would be subject to City of Los Angeles approval.

[10] Proposed haul route application for the proposed Project. 5/11/18

2.7 Project Design Features

Air Quality

PDF-AQ-1: The following measures will be employed by the project to minimize construction-related emissions:

- The project shall obtain concrete for use during the concrete-pour phase of construction from local concrete suppliers located within a 7-mile radius of the project site.

Geology and Soils

PDF GEO-1*:* The project shall provide corrosion protection for metals in areas where corrosive groundwater or soil could potentially cause deterioration. Corrosion protection techniques could include epoxy and metallic protective coatings, the use of alternative (corrosion resistant) materials, and selection of the appropriate type of cement and water/cement ratio. The reinforced concrete mix design shall be performed following the latest Building Code regulations. Specific measures to reduce the potential effects shall be developed in the design phase to reduce impacts related to corrosive soils to low levels and shall be approved by the Los Angeles Department of Building and Safety.

Greenhouse Gases

PDF-GHG-1: No more than 50 percent of the residential units shall have an indoor fireplace installed. This measure would reduce the consumption of natural gas and associated GHG emissions.

Noise

PDF-NOI-1: Each mechanical room shall be outfitted with sound attenuation measures to further minimize noise levels at neighboring properties in accordance with Section 112.02 of the LAMC, which prohibits noise from mechanical equipment from exceeding the ambient noise level on the premises of other occupied properties by more than 5 dBA.

PDF-NOI-2: The mechanical room at the ground-floor level of the Project building adjacent to the alleyway housing the emergency generators shall be designed with sufficient noise attenuation features (e.g., silencers, generator enclosures, insulation, etc.) to provide compliance with Section 112.02 of the LAMC, which prohibits noise from mechanical equipment from exceeding the ambient noise level on the premises of other occupied properties by more than 5 dBA.

Public Services

PDF-PS-1: A construction fence shall be constructed around the project site to minimize trespassing, vandalism, short-cut attractions and attractive nuisances.

PDF-PS-2: Prior to the occupancy of the project, the Applicant shall provide the Central Area Commanding Officer with a diagram of each portion of the property, including access routes, and additional information to facilitate potential LAPD responses.

PDF PS-3: The project would incorporate security measures for the safety of residents, TORS guests, employees, and visitors to the project site. During operation of the project, traffic access to the residential parking areas from South Hill Street would be controlled and access to the lower levels would be remain open for commercial and TORs unit parking. Access to parking via the alley entrance would be controlled though gated entries outside of business hours and the entry areas would be well illuminated. Site security would include controlled keycard access to residential and TORs unit areas, parking areas, patrolled security for TORs unit areas, secured entry and exit points to all buildings, alarmed systems for commercial areas, and security lighting within common areas and entryways, and closed-circuit TV monitoring (CCTV).

Transportation

PDF TRAF-1: The Applicant shall prepare a detailed Construction Management Plan that shall include, but not be limited to, the following elements, as appropriate:

- Provide off-site truck staging in a legal area furnished by the construction truck contractor.
- Schedule deliveries and pick-ups of construction materials during non-peak travel periods to the extent possible and coordinate to reduce the potential of trucks waiting to load or unload for protracted periods.
- As parking, travel lane, and/or sidewalk closures are anticipated, worksite traffic control plan(s), approved by the City of Los Angeles, should be implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures.
- Determine with the City the number and location of flag men required to reroute traffic and accommodate deliveries as needed.
- Establish requirements for loading/unloading and storage of materials on the project site, where parking spaces would be encumbered, length of time traffic travel lanes can be encumbered, sidewalk closings or pedestrian diversions to ensure the safety of the pedestrian and access to local businesses and residences.
- Ensure that access will remain unobstructed for land uses in proximity to the project site during project construction.
- Coordinate with the City and emergency service providers to ensure adequate access is maintained to the project site and neighboring businesses, residences, and other ongoing projects such as the downtown LA Streetcar.
- Construction notices/hotline will be posted at several locations on the project site.

2.8 Related Projects

In accordance with CEQA Guidelines Section 15064(h), this SCEA includes an evaluation of the project's cumulative impacts. The guidance provided under CEQA Guidelines Section

15064 (h) is as follows:

> "(1) When assessing whether a cumulative effect requires an EIR, the lead agency shall consider whether the cumulative impact is significant and whether the effects of the project are cumulatively considerable. An EIR must be prepared if the cumulative impact may be significant and the project's incremental effect, though individually limited, is cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.
>
> (2) A lead agency may determine in an initial study that a project's contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus is not significant. When a project might contribute to a significant cumulative impact, but the contribution will be rendered less than cumulatively considerable through mitigation measures set forth in a mitigated negative declaration, the initial study shall briefly indicate and explain how the contribution has been rendered less than cumulatively considerable.
>
> (3) A lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program (including, but not limited to, water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plan, plans or regulations for the reduction of greenhouse gas emissions) that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area in which the project is located. Such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. When relying on a plan, regulation or program, the lead agency should explain how implementing the particular requirements in the plan, regulation or program ensure that the project's incremental contribution to the cumulative effect is not cumulatively considerable. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable not with standing that the project complies with the specified plan or mitigation program addressing the cumulative problem, an EIR must be prepared for the project.
>
> (4) The mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project's incremental effects are cumulatively considerable."

The analysis of cumulative impacts provided herein is based on an assessment of cumulative development associated with a list of past, present, and probable future projects producing related or cumulative impacts. A list of 35 related projects in the vicinity of the project study area is

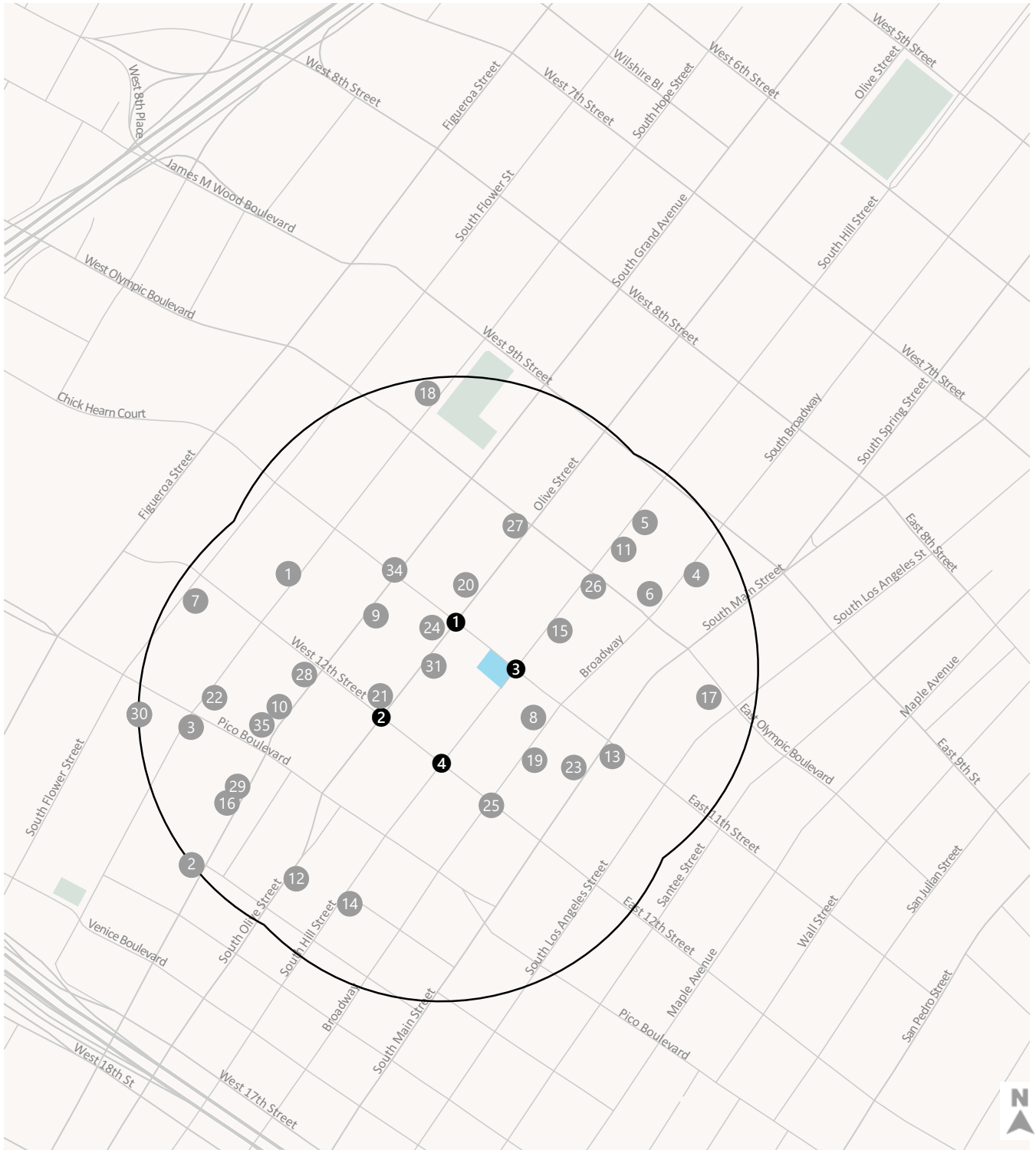
provided in **Table 2-4**, *Summary of Related Projects*. Related Projects are mapped on Figure 2-10, *Related Projects Map*. An analysis of the cumulative impacts associated with these related projects and the project are provided under each individual environmental impact category in Section 6 of this SCEA. Although these projects serve as the primary bases for evaluation of cumulative impacts, analyses may vary among certain environmental issues due to the unique characteristics and geographic context of certain impacts.

TABLE 2-4 SUMMARY OF RELATED PROJECTS

No.	Address	Description	Size	
1	1133 S Hope St	Apartments	208	du
		Retail	5.029	ksf
2	1401 S Grand Ave [b]	Hospital	148.465	ksf
		Retail	6	ksf
3	1306 S Hope St	Apartments	419	du
		Retail	42.2	ksf
4	928 S Broadway	Apartments	667	du
		Retail	58.7	ksf
5	920 S Hill St	Apartments	239	du
		Retail	5.4	ksf
6	955 S Broadway	Apartments	201	du
		Retail	6	ksf
7	1212 W Flower St	Condominiums	730	du
		Retail	10.5	ksf
		Office	70.465	ksf
8	1111 S Broadway	Apartments	391	du
		Office	41.14	ksf
		Retail	40	ksf
9	1120 S Grand Ave	Apartments	666	du
		Retail	20.69	ksf
10	1229 S Grand Ave	Condominiums	161	du
		Restaurant	3	ksf
11	940 S Hill St	Apartments	232	du
		Restaurant	14	ksf
12	1340 S Olive St	Apartments	156	du
		Retail	5	ksf
		Restaurant	10	ksf
13	1100 S Main St	Apartments	379	du
		Retail	25.81	ksf
14	1340 S Hill St	Apartments	235	du
		Retail	5.25	ksf
		Restaurant	4	ksf
15	1030 S Hill St	Apartments	700	du
		Retail	7	ksf
		Restaurant	8	ksf
16	1323 S Grand Av	Apartments	284	du
		Retail	5.2	ksf
		Restaurant	1.1	ksf

No.	Address	Description	Size	
17	124 E Olympic Bl	Hotel	149	rooms
		Restaurant	6.7	ksf
18	949 S Hope St	Apartments	236	du
		Restaurant	5.06	ksf
		Retail	1	ksf
19	1138 S Broadway	Hotel	138	rooms
20	1045 S Olive St	Apartments	794	du
		Commercial	15	ksf
21	1155 S Olive St	Hotel	258	Rooms
		Retail	1.896	ksf
		Restaurant	2.722	ksf
22	1246 S Hope St	Apartments	135	du
		Hotel	450	rooms
		Retail	15.891	ksf
23	1123 S Main St	Apartments	363	du
		Retail	12.5	ksf
24	1105 S Olive St [b]	Apartments	536	du
		Commercial	6.153	ksf
25	1200 S Broadway [b]	Apartments	177	du
26	1000 S. Hill St [b]	Apartments	498	du
		Commercial	8.707	ksf
27	1001 S Olive St [c]	Apartments	225	du
		Restaurant	5	ksf
28	1201 S Grand Ave [b]	Apartments	312	du
		Retail	7.1	ksf
29	1317 S Grand Ave [b]	Apartments	151	du
30	1320 S Flower St [b]	Hotel	43	rooms
		Apartments	2	du
31	1120 S Olive St [b]	Apartments	713	du
		Commercial	11.277	ksf
32	Los Angeles Street Car [d]	Infrastructure Project	-	-
33	Regional Connector Transit Project [e]	Infrastructure Project	-	-
34	1099 S Grand Ave	Hotel	160	rooms
		Restaurant	14	ksf
35	1247 S Grand Ave	Apartments	115	du
		Retail	4.61	ksf

Notes:
du = dwelling unit; ksf = one thousand square feet
[a] Related projects list is based on information provided by LADOT and contained in Appendix K.
[b] Projects were not included in information provided by LADOT. Projects and land use from third party research. Trip generation estimates based on Institute of Transportation Engineers rates.
[c] Projects were not included on information provided by LADOT, but were included from list provided on December 10, 2018 due to close proximity to project.
[d] The Los Angeles Street Car is a 3.8-mile route connecting riders with places like South Park, the Financial District and Historic Broadway, Grand Park and the Civic Center, the Fashion District and the Convention Center, Staples Center, and LA Live.
[e] The Regional Connector Transit Project is a 1.9-mile alignment that will serve Little Tokyo, the Arts District, Civic Center, The Historic Core, Broadway, Grand Avenue, Bunker Hill, Flower Street, and the Financial District.



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Source: Fehr Peers

Figure 2-10
Related Projects
1111 South Hill Street Project

2.9 Project Approvals

Discretionary Approvals

The City of Los Angeles has the principal responsibility for approving the project. Approvals required for development of the project may include, but are not limited to, the following:

- Per LAMC Section 14.5.6 (B), a Transfer of Floor Area Rights ("TFAR") of Greater than 50,000 Square Feet from the Los Angeles Convention Center ("Donor Site") to allow an increase of up to 327,487 square feet of floor area for a total of 491,977 square feet of floor area (11.34:1 FAR) in lieu of the maximum permitted 6:1 FAR;

- Per LAMC Section 12.24.W.24.(e), a Conditional Use Permit to allow the proposed 160 TORS units (dwelling units with kitchens, operating as a commercial hotel with occupancy for 30 days or less) in the C2 Zone;

- Per LAMC Section 12.24.S, as part of the Conditional Use Permit approval for TORS, to allow a 20% reduction in the required automobile parking for the TORS units (prior to accounting for parking reductions from bicycle credits).

- Per LAMC Section 12.21.G.3.(a)(2), a Director's Decision to allow a 10 percent increase in the qualifying area of recreation rooms (indoor open space) for a maximum 35 percent of the total required usable open space.

- Per LAMC Section 12.24.W.1., a Main Conditional Use Permit to allow the on-site sales and dispensing of a full line of alcohol in conjunction with the operation of 160 TORS units (dwelling units with kitchens, operating as a commercial hotel with occupancy for 30 days or less) and ground floor restaurants;

- Per LAMC Section 16.05, approval of Site Plan Review;

- Per LAMC Section 17.15 a Vesting Tentative Tract Map (VTT-82178) to subdivide the Project Site into one Master Ground Lot and nine Airspace Lots for residential and commercial condominium purposes, including the following:

  – Required 2-foot wide dedication on 11th Street proposed to be limited to a maximum height of 15 feet above sidewalk grade and 10 feet below sidewalk grade;

  – Required 3-foot wide easement on 11th Street proposed to be limited to a maximum height of 15 feet above sidewalk grade and 5 feet below sidewalk grade;

  – Required 20-foot radius corner cut dedication at Hill Street and 11th Street proposed to be limited to a maximum height of 15 feet above sidewalk grade and 10 feet below sidewalk grade.

  – The Applicant also requests that the proposed Haul Route be approved concurrent with the Vesting Tentative Tract Map.

- Construction permits including: building, demolition, excavation, shoring, grading, foundation and removal of an existing street tree
- Pursuant to LAMC Section 41.40, approval of a Board of Police Commissioners Permit for a continuous concrete pour occurring outside of 9:00 p.m. and 7:00 a.m.;
- Adoption of the SCEA; and
- Other discretionary and ministerial permits and approvals that may be deemed necessary.

SECTION 3

Sustainable Communities Environmental Assessment Criteria

3.1 Senate Bill 375

The State of California adopted Senate Bill (SB) 375, the Sustainable Communities and Climate Protection Act of 2008, to outline growth strategies and better integrate regional land use and transportation planning, which will help the State meet its greenhouse gas reduction mandates. SB 375 requires that the State's 18 metropolitan planning organizations incorporate a "sustainable communities strategy" with their respective regional transportation plans to achieve their respective region's greenhouse gas emission reduction targets set by the California Air Resources Board (CARB). The Southern California Association of Governments (SCAG) is the metropolitan planning organization that has jurisdiction over the project site.

On September 3, 2020, the SCAG's Regional Council formally adopted an update to the 2016-2040 RTP/SCS; entitled (2020–2045 Regional Transportation Plan/Sustainable Communities Strategy) (SCAG 2020–2045 RTP/SCS) also known as the Connect SoCal. Under SB 375, CARB is required to adopt regional targets for GHG emissions reductions from passenger vehicle use for each of the state's metropolitan planning organization (MPO) regions and to update those targets every 8 years. The most recent update to the regional GHG reduction targets occurred in 2018. For the SCAG region, CARB has set GHG emissions reduction targets to 8 percent below 2005 per capita emissions levels by 2020 and 19 percent below 2005 per capita emissions levels by 2035. SCAG articulates its path to achieving these reductions through the SCS as part of the development of the RTP. The 2020–2045 RTP/SCS outlines strategies to achieve these targets set by CARB and balances southern California's regional future mobility and housing needs with economic, environmental, and public health goals. SCAG indicates that the 2020–2045 RTP/SCS will achieve the per capita GHG emission reductions relative to 2005 levels of 8 percent in 2020 and 19 percent in 2035. Upon full implementation of the 2020–2045 RTP/SCS, it would achieve the 2020 and 2035 GHG emission reduction targets established by CARB.

3.2 Transit Priority Project Criteria

SB 375 provides CEQA streamlining benefits to transit priority projects (TPPs). A TPP is a project that meets the following four criteria (Public Resources Code [PRC] Section 21155 (a) and (b)):

1. Is consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in SCAG's 2020-2045 RTP/SCS;

2. Contains at least 50 percent residential use, based on total building square footage and, if the project contains between 26 percent and 50 percent nonresidential uses, a floor area ratio of not less than 0.75;
3. Provides a minimum net density of at least 20 units per acre; and
4. Is located within one-half mile of a major transit stop or high-quality transit corridor included in Connect SoCal.

As discussed below, the project qualifies as a TPP pursuant to the above criteria.

Consistency with Criterion 1: Project uses designation, density, building intensity, and applicable policies specified for the project area in SCAG's 2020-2045 RTP/SCS.

The project is consistent with applicable goals and policies presented within 2020-2045 RTP/SCS, as shown by the consistency analysis presented in Table 3-1.

TABLE 3-1. CONSISTENCY ANALYSIS WITH THE 2020–2045 REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITY STRATEGY POLICES

Goals and Policies	Consistency Assessment
2020-2045 RTP/SCS Goals	
Goal 1. Encourage regional economic prosperity and global competitiveness.	**Not Applicable**. SCAG and its member agencies are responsible for aligning RTP/SCS investments and polices with improving regional economic prosperity and competitiveness. The project would not conflict with this goal.
Goal 2. Improve mobility, accessibility, reliability, and travel safety for people and goods.	**Consistent.** The project site is located in an active, mixed-use area that offers an array of transportation choices, with ready access to transit infrastructure and employment. The project includes new residential condominiums, TORS units, and commercial uses in the diverse South Park neighborhood of downtown Los Angeles. The project site is located in a highly walkable area surrounded by a diverse mix of land uses, including high- and mid-rise office buildings, residential buildings, hotels, retail and restaurant uses, museums, night clubs, theaters, cultural districts, warehouses, and light industrial uses. The project is also located in an identified Transit Priority Area near a number of transit opportunities including the nearby Metro Rail Pico Station (less than 0.3 miles from the project site), the 7th/Metro Center Station (approximately 0.7 mile from the project site) and the Metro Pershing Square Station (approximately 0.8 miles from the project site). The project site is also served by multiple bus lines via stations at Olive Street/11th Street (serving the 14/37, 70, 71, 76, 78/79/378, and 96 lines), Hill Street/12th Street (serving the 83, 90/91, 94, Commuter Express 409, and Dash downtown D lines), and Broadway/11th Street (serving the 2/302, 4, and 745 lines). The closest Metro bike share stations are located at 12th Street and Hill Street (129 West 12th Street) and at Grand Avenue and 14th Street (1375 South Grand Avenue). The project site is also immediately adjacent to the future downtown LA Streetcar route along 11th Street. In addition, near the project site, Tier 1 bike lanes are provided along 11th street, northwest of Broadway. Tier 3 bike lanes are provided on South Hill Street, north of the 10 freeway and south of 4th street. The project's close location near transit enables residents and visitors to the project to reach surrounding services, jobs, and other destinations with relative ease and within a reasonable time, using a diverse array of transportation choices. This supports the goal of increased mobility, accessibility, reliability, and travel safety.

Goals and Policies	Consistency Assessment
	The project would support public safety for travel near the project site by providing new lighting within the project site and around the perimeter including new building identification lighting, commercial accent lighting, wayfinding, balcony lighting, and security lighting. The project would incorporate street lighting along South Hill Street and West 11th Street, with street lighting on 11th Street to match the recently installed lights on 11th Street corridor for the MyFig project. Pedestrian areas including pathways and entryways into the project would be well-lit for security and ground-mounted. Pedestrian access to the project would be distinct from vehicle driveways and the project would not mix pedestrian and automobile traffic to ensure pedestrian safety. The project would be subject to site Plan review to ensure vehicle and pedestrian safety throughout the project. Therefore, the project is consistent with this goal.
Goal 3. Enhance the preservation, security, and resilience of the regional transportation system.	**Consistent.** The project would support the regional transit system by encouraging increased transit use, as the project would be located in close proximity to the Metro Rail Pico Station and the 7th/Metro Center Station, and numerous bus lines, thereby contributing to increased ridership, preservation, and resilience of the City's multimodal transportation system in the region**.**
Goal 4. Increase person and goods movement and travel choices within the transportation system.	**Consistent**. The project would encourage the use of mass transit, walking and bicycling, as the project would locate mixed-use residential condominium, TORS units, and commercial development on a project site that is located near numerous bus lines, the Metro Rail Pico Station, 7th/Metro Center Station, and bicycle lanes. Since the project would develop residential uses within walking distance of existing bus lines and light rail transit stations, and would also provide long-term and short-term bicycle parking, the project would provide opportunities for residents and visitors to use public transit for work trips, and walk to retail businesses near the project area. Thus, the project would encourage the utilization of mass transit as a mode of transportation to and from the project site area and contribute to increasing person and travel choices within the transportation system. The project would be consistent with this goal.
Goal 5. Reduce greenhouse gas emissions and improve air quality.	**Consistent.** The project would be consistent with this Goal by facilitating the use of alternative modes of transportation, which would aid in reducing car trips and positively impact air quality and reduce greenhouse gas emissions. The project includes pre-wiring for EV charging spaces for 30 percent of project's parking capacity for future use. Of the 30 percent EV parking spaces, 10 percent of the total parking capacity would include installed chargers for immediate use by EV. The project includes ample bicycle parking spaces for the residential condominium, TORS units, and commercial uses of the project. The project would encourage transit, pedestrian and bicycle travel by incorporating a mixture of land uses area surrounded by a diverse mix of land uses including residential, commercial, and service uses. The project would be within close proximity to multiple transit options. Furthermore, the project would include pedestrian-friendly landscaping and design, streetscape improvements, and street level commercial uses that would enliven the pedestrian experience. The project would also include a number of sustainability features that would reduce greenhouse gas emissions and improve air quality, including high efficiency heating, ventilation, and air conditioning (HVAC) equipment consisting of water source heat pumps; high efficiency glazing, external shading, enhanced insulation, enhanced façade design to minimize infiltration, high-efficiency condensing boilers, and combination of instantaneous water heaters and centralized water heaters; compartmentalized design and interior barriers to limit stack effect through building and resultant infiltration of un-conditioned air; light-emitting diode (LED) lighting; lighting controls; energy Star–labeled appliances; variable flow pool pumps; and commissioning of all mechanical, electrical, and plumbing systems.

Goals and Policies	Consistency Assessment
Goal 6. Support healthy and equitable communities.	**Consistent**. The project would be consistent with this Goal by facilitating the use of alternative modes of transportation and a diversity of housing options, which would support healthy and equitable communities. The project site is located in the Central City Community Plan area. According to the City data contained in the City of Los Angeles Interactive Health Atlas, the Central City Community Plan area has a walkability score of 10.3, the highest walkability score in the City. As the Health Atlas only tracks data at the Community Plan level, walkability data was also gathered for the project site specifically. According to Walkscore.com, the project site is rated 92 for a walk score, which means daily errands can be accomplished on foot and many residents are able to forgo owning a car.[1] The project site's bike score is rated "Very Bikeable" with a score of 87, which means the area is good for biking based on bike lanes and trails, hills, and road connectivity.[2] The project site is also rated a "Rider's Paradise" for transit score with a score of 100, which means the project site is served by world-class public transportation. In addition, the City of Los Angeles adopted the Health and Wellness General Plan Element (Plan for a Healthy Los Angeles) in March 2015 that provides a high-level policy vision, along with goals and objectives to elevate health as a priority for the City's future growth and development[3]. Some of the land use goals include accommodating a diversity of land uses, encouraging development near mobility options, supporting transit-oriented development, and emphasizing bicycle mobility. The project would encourage pedestrian travel and bicycle by developing new residential and commercial uses on-site within a mixed-use development in an urban area surrounded by a diverse mix of land uses including residential, commercial, industrial and service uses. The project would be within close proximity to multiple transit options. Furthermore, the project would include pedestrian-friendly landscaping and design, streetscape improvements, and street level commercial uses that would enliven the pedestrian experience for the entire community.
Goal 7. Adapt to a changing climate and support an integrated regional development pattern and transportation network.	**Consistent**. Consistent. The project would be consistent with this Goal by facilitating the use of alternative modes of transportation, which would aid in adapting to a changing climate and supporting an integrated regional development pattern and transportation network. The project encourages increased transit use, as the project would be located in close proximity to the Metro Rail Pico Station and the 7th/Metro Center Station, thereby contributing to increased ridership of the City's multimodal transportation network. The project includes an ample amount of bicycle parking spaces for the residential condominium, TORS units, and commercial uses of the project. The project would encourage pedestrian travel by incorporating new residential and commercial uses on-site within a mixed-use development as well as locating the project in an urban area surrounded by a diverse mix of land uses including residential, commercial, industrial and service uses. The project would also comply with the California Title 24 Building Standards Code and CALGreen Code. Energy savings and a sustainable design would be incorporated throughout the project. The project would emphasize energy conservation, which would be achieved through the use of energy-efficient HVAC and lighting systems.
Goal 8. Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	**Not Applicable**. This goal is directed towards SCAG to result in more efficient travel. Nevertheless, the project would include 30 percent of parking spaces that would be prewired for charging EVs, and 10 percent would have chargers installed for immediate use by EVs.

1 https://www.walkscore.com/score/1111-s-hill-st-los-angeles-ca-90015. Accessed July 17, 2021.

2 https://www.walkscore.com/score/1111-s-hill-st-los-angeles-ca-90015. Accessed July 17, 2021.

3 https://planning.lacity.org/odocument/7f065983-ff10-4e76-81e5-e166c9b78a9e/Plan_for_a_Healthy_Los_Angeles.pdf Accessed July 29, 2021.

Goals and Policies	Consistency Assessment
Goal 9. Encourage development of diverse housing types in areas that are supported by multiple transportation options.	**Consistent.** The project is a mixed-use project would include 319 new multi-family residential units of various sizes and for different household types. It is anticipated that the residential unit count would comprise 24 studio units, 144 one-bedroom units, 127 two-bedroom units, 20 three-bedroom units, and 4 three-bedroom penthouse units. It would place this housing near jobs, services, and transit and provide ample bicycle parking and pedestrian infrastructure to incentivize increased biking and walking. The project also encourages increased transit use, as the project would be located in close proximity to the Metro Rail Pico Station and the 7th/Metro Center Station, and multiple bus routes, thereby contributing to increased ridership of the City's multimodal transportation system in the region and transportation options for the users of the project site.
Goal 10. Promote conservation of natural and agricultural lands and restoration of habitats.	**Consistent**. The project would be consistent with this Goal because the project does not propose the conversion of any natural or agricultural lands to urban use. The project is located in an urban, infill site, and there are no natural or agricultural lands on or near the project site.
Principle 1. Base transportation investments on adopted regional performance indicators and MAP-21/FAST Act regional targets.	**Not Applicable**. This principle is directed toward SCAG in allocating transportation investments. This principle does not apply to the individual development projects such as the project, and no further analysis is required**.**
Principle 2. Place high priority for transportation funding in the region on projects and programs that improve mobility, accessibility, reliability and safety, and that preserve the existing transportation system	**Not Applicable**. This principle is directed towards SCAG in allocating transportation system funding. Nevertheless, the project would contribute to a safe, well maintained, and efficient multimodal transportation system.
Principle 3. Assure that land use and growth strategies recognize local input, promote sustainable transportation options, and support equitable and adaptable communities	**Not Applicable.** This principle is directed towards SCAG and the City of Los Angeles and does not apply to individual projects such as the project. Nevertheless, the project site's urban infill location near mass transit and proximity to services, commercial uses, and employment opportunities promotes a pedestrian-friendly environment and supports equitable and adaptable communities. The location of the project site also promotes the use of a variety of transportation options, which includes walking and the use of public transportation.
Principle 4. Encourage RTP/SCS investments and strategies that collectively result in reduced non-recurrent congestion and demand for single occupancy vehicle use, by leveraging new transportation technologies and expanding travel choices	**Not Applicable**. The project would not involve RTP/SCS investments but would place housing and employment options near multiple public transportation options and non-motorized transportation infrastructure, which would reduce demand for single occupancy vehicle use and leverage past and future RTP/SCS investments. As shown in Figures 3-1 and 3-2, the project would be located within a HQTA and a TPA, and, as such, would support public transportation and other alternative methods of transportation that reduce single-occupancy vehicle use.
Principle 5. Encourage transportation investments that will result in improved air quality and public health, and reduced greenhouse gas emissions	**Consistent**. The project would increase housing options in Downtown LA and provide employment opportunities near multiple public transit options. The project's proximity to transit would reduce vehicle trips and associated regional and localized air pollutant and GHG emissions, which would support the goals of public health.
Principle 6. Monitor progress on all aspects of the Plan, including the timely implementation of projects, programs, and strategies	**Not Applicable**. This principle is directed towards SCAG and the City of Los Angeles and not does apply to individual projects such as the project.
Principle 7. Regionally, transportation investments should reflect best-known science regarding climate change vulnerability, in order to design for long term resilience	**Not Applicable**. SCAG and its member agencies are responsible for transportation investments and ensuring that they reflect the best-known science regarding climate change vulnerability and not does apply to individual projects such as the project.

Goals and Policies	Consistency Assessment
Focus Growth Near Destinations & Mobility Options Strategy 1. Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations	**Consistent**. As stated above, the project would provide commercial uses and residential units in a HQTA and a TPA, as shown in Figures 3-1 and 3-2. The project would place housing near jobs and transit and provide ample bicycle parking and pedestrian infrastructure to incentivize increased biking and walking. The project would include ample bicycle parking spaces for the residential condominium, TORS, and commercial uses of the project, in accordance with LAMC requirements. The project also encourages increased transit use, as the project would be located in close proximity to the Metro Rail Pico Station and the 7th/Metro Center Station, thereby contributing to increased ridership of the City's multimodal transportation system in the region and transportation options for the users of the project site.
Focus Growth Near Destinations & Mobility Options Strategy 2. Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets	**Consistent**. As stated above, the project would provide new jobs and housing through the introduction of TORS units, commercial, and residential condominium uses in a HQTA and a TPA, as shown in Figures 3-1 and 3-2. The project site is in close proximity to a network of regional transportation facilities providing connectivity to the greater Los Angeles County. The project site is less than 0.3 miles northeast of the Metro Rail Pico Station, approximately 0.7 miles southeast of the 7th/Metro Center Station, and approximately 0.8 miles south of the Metro Pershing Square Station. The project site is also served by multiple bus lines via stations at Olive Street/11th Street (serving the 14/37, 70, 71, 76, 78/79/378, and 96 lines), Hill Street/12th Street (serving the 83, 90/91, 94, Commuter Express 409, and Dash downtown D lines), and Broadway/11th Street (serving the 2/302, 4, and 745 lines). The project site is also immediately adjacent to the future downtown LA Streetcar route along 11th Street. The downtown LA Streetcar is a planned 4-mile route that would provide connections to downtown neighborhoods, destinations, and regional transit options. As the project site is surrounded by various land uses, including residences, hotels, offices, restaurants, retail uses, parking structures, and surface parking lots, it is likely that addition to transit, visitors, workers and residents would also walk and bicycle to and from the project to destinations. The project would support this by providing bicycle parking and providing enhanced pedestrian amenities around the project site.
Focus Growth Near Destinations & Mobility Options Strategy 3. Plan for growth near transit investments and support implementation of first/last mile strategies	**Consistent**. As stated above, the project would provide commercial and residential uses in a HQTA and a TPA, as shown in Figures 3-1 and 3-2. The project site is in close proximity to a network of existing regional transit systems providing connectivity to the greater Los Angeles County. The project site is less than 0.3 miles northeast of the Metro Rail Pico Station, approximately 0.7 miles southeast of the 7th/Metro Center Station, and approximately 0.8 miles south of the Metro Pershing Square Station. In addition, the project would provide ample bicycle parking and pedestrian infrastructure to incentivize increased biking and walking for the first/last mile. The project site is also immediately adjacent to the future planned transportation investments including the downtown LA Streetcar route. Also, currently under construction, is the Metro Regional Connector Project, a 1.9-mile alignment which will extend from the Little Tokyo/Arts District Station to the 7th Street/Metro Center Station in downtown Los Angeles.
Focus Growth Near Destinations & Mobility Options Strategy 4. Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses	**Consistent**. The project would remove an existing, vacant, warehouse uses and create substantial new investment on the project site but creating, new and active uses including 3,429 sf of ground floor commercial uses and up to 160 new TORS units.
Focus Growth Near Destinations & Mobility Options Strategy 5. Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods	**Consistent**. The project would remove an existing, underutilized, vacant, warehouse and redevelop the site with up to 319 multi-family residential units, up to 3,429 sf of ground floor commercial uses, up to 160 TORS units. Furthermore, the project would include pedestrian-friendly landscaping and design, streetscape improvements, and street level commercial uses that would enliven the pedestrian experience and increase connectivity for the entire community.

Goals and Policies	Consistency Assessment
Focus Growth Near Destinations & Mobility Options Strategy 6. Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations)	**Consistent**. The project would facilitate the use of alternative modes of transportation, which would aid in reducing the number of solo car trips. The project includes ample bicycle parking spaces for the residential condominiums, TORS units, and commercial uses of the project. The project would encourage pedestrian travel by incorporating new residential, TORS, and commercial uses on-site within a mixed-use development as well as locating the project in an urban area surrounded by a diverse mix of land uses including residential, commercial, industrial and service uses. The project would be within close proximity to multiple transit options. Furthermore, the project would include pedestrian-friendly landscaping and design, streetscape improvements, and street level commercial uses that would enliven the pedestrian experience.
Focus Growth Near Destinations & Mobility Options Strategy 7. Identify ways to "right size" parking requirements and promote alternative parking strategies (e.g. shared parking or smart parking)	**Consistent**. The project would include up to 436 total vehicle parking spaces, in compliance with the LAMC requirement. The project qualifies for a reduction in automobile parking spaces, under the Municipal Code's bicycle parking reduction provision (LAMC Section 12.21 A.4 and 12.21 A.16). Additionally, the project proposes allocation of designated parking for fuel-efficient, ride sharing, and alternative fuel vehicles and pre-wiring for EV charging spaces for 30 percent of project's parking capacity for future use. The project would also provide ample bike parking in compliance with the LAMC requirements.
Promote Diverse Housing Choices Strategy 1. Preserve and rehabilitate affordable housing and prevent displacement	**Consistent**. The project is an infill development proposed on an urban infill site that does not contain any existing housing units.
Promote Diverse Housing Choices Strategy 2. Identify funding opportunities for new workforce and affordable housing development	**Not Applicable.** This strategy is directed toward SCAG and does not apply to individual projects such as the project. Nevertheless, the project would be providing 319 new housing units, in in a variety of sizes and price levels, in an urbanized area within the City of Los Angeles. As part of the Transfer of Floor Area Ratio (TFAR) entitlement, the Project would make a substantial Public Benefit Payment (PBP) and the City may utilize the PBP for the provision of affordable housing upon City Council approval.
Promote Diverse Housing Choices Strategy 3. Create incentives and reduce regulatory barriers for building context-sensitive accessory dwelling units to increase housing supply	**Not Applicable**. This strategy is directed towards SCAG and does not apply to individual projects such as the project.
Promote Diverse Housing Choices Strategy 4. Provide support to local jurisdictions to streamline and lessen barriers to housing development that supports reduction of greenhouse gas emissions	**Consistent**. This strategy is directed towards SCAG and does not apply to individual projects such as the project. However, the project site's urban infill location near mass transit and proximity to services, commercial uses, and employment opportunities promotes a pedestrian- friendly environment and supports reduced greenhouse gas emissions. The location of the project site also promotes the use of a variety of transportation options, which includes walking and the use of public transportation, which also supports reduced greenhouse gas emissions.
Leverage Technology Innovations Strategy 1. Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space	**Consistent**. This strategy is directed toward SCAG and does not apply to individual projects such as the project. However, the project pre-wiring for EV charging spaces for 30 percent of project's parking capacity and 10 percent of the project's parking with EV chargers. The project would also provide ample bike parking in compliance with the LAMC requirements.
Leverage Technology Innovations Strategy 2. Improve access to services through technology—such as telework and telemedicine as well as other incentives such as a "mobility wallet," an app-based system for storing transit and other multi-modal payments	**Not Applicable**. This strategy is directed towards SCAG and does not apply to individual projects such as the project.

Goals and Policies	Consistency Assessment
Leverage Technology Innovations Strategy 3. Identify ways to incorporate “micro-power grids” in communities, for example solar energy, hydrogen fuel cell power storage and power generation	**Consistent**. This strategy is directed towards SCAG and does not apply to individual projects such as the project. However, the project would include a number of energy conservation and efficiency measures such as high efficiency HVAC equipment consisting of water source heat pumps; high efficiency glazing, external shading, enhanced insulation, enhanced façade design to minimize infiltration, high-efficiency condensing boilers, and combination of instantaneous water heaters and centralized water heaters; and energy Star–labeled equipment. The project would also dedicate 15 percent of its rooftop area to solar panels
Support Implementation of Sustainability Policies Strategy 1. Pursue funding opportunities to support local sustainable development implementation projects that reduce greenhouse gas emissions	**Consistent**. This strategy is directed towards SCAG and does not apply to individual projects such as the project. However, the project site’s urban infill location near mass transit and proximity to services, commercial uses, and employment opportunities promotes a pedestrian- friendly environment and supports reduced greenhouse gas emissions. The location of the project site also promotes the use of a variety of transportation options, which includes walking and the use of public transportation, which also supports reduced greenhouse gas emissions.
Support Implementation of Sustainability Policies Strategy 2. Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations	**Consistent**. This strategy is directed towards SCAG and does not apply to individual projects such as the project. However, the project would provide commercial and residential uses in a HQTA and a TPA, as shown in Figures 3-1 and 3-2. The project site is in close proximity to a network of existing and planned regional transit corridors, bus routes, and stations providing connectivity to the greater Los Angeles County.
Support Implementation of Sustainability Policies Strategy 3. Support local jurisdictions in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), or other tax increment or value capture tools to finance sustainable infrastructure and development projects, including parks and open space	**Not Applicable**. This strategy is directed towards SCAG and does not apply to individual projects such as the project.
Support Implementation of Sustainability Policies Strategy 4. Work with local jurisdictions/communities to identify opportunities and assess barriers to implement sustainability strategies	**Consistent**. This strategy is directed towards SCAG and does not apply to individual projects such as the project. However, the project would include a number of sustainability measures including energy efficiency, water efficiency, material conservation, and resource efficiency.
Support Implementation of Sustainability Policies Strategy 5. Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region	**Not Applicable**. This strategy is directed towards SCAG and does not apply to individual projects such as the project.
Support Implementation of Sustainability Policies Strategy 6. Continue to support long range planning efforts by local jurisdictions	**Not Applicable**. This strategy is directed towards SCAG and does not apply to individual projects such as the project.
Support Implementation of Sustainability Policies Strategy 7. Provide educational opportunities to local decisions makers and staff on new tools, best practices and policies related to implementing the Sustainable Communities Strategy	**Not Applicable**. This strategy is directed towards SCAG and does not apply to individual projects such as the project.

Goals and Policies	Consistency Assessment
Promote a Green Region Strategy 1. Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards	**Consistent**. This strategy is directed towards SCAG and does not apply to individual projects such as the project. However, the project would facilitate the use of alternative modes of transportation, which would aid in local climate adaptation and community resiliency. The project encourages increased transit use, as the project would be located in close proximity to the Metro Rail Pico Station and the 7th/Metro Center Station, thereby contributing to increased ridership of the City's multimodal transportation network. The project includes ample bicycle parking spaces for the residential, TORS, and commercial uses of the project. The project would encourage pedestrian travel by incorporating new residential and commercial uses on-site within a mixed-use development as well as locating the project in an urban area surrounded by a diverse mix of land uses including residential, commercial, industrial and service uses.
Promote a Green Region Strategy 2. Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration	**Consistent**. This strategy is directed towards SCAG and does not apply to individual projects such as the project. However, the project would be required to comply with California Building Code Title 24. Energy saving and sustainable design would be incorporated throughout the project. The project would emphasize energy and water conservation, which would be achieved through the use of energy efficient HVAC and lighting systems, and energy star appliances, and low flow plumbing fixtures. The project would include pre-wiring for EV charging spaces for 30 percent of project's parking capacity for future use. In addition, of the 30 percent EV parking spaces, 10 percent of the project's parking capacity would include installed chargers for immediate use by EV. In addition, the project would include one tree for every four dwelling units, totaling 120 trees. The project would also include a landscaped podium amenity deck on level five and a landscaped amenity roof deck on level 40, both of which would include a garden and landscaping. At each corner of the building, on the roof deck, the project would include four distinctive circular crown rooftop elements that would provide cascading landscaping.
Promote a Green Region Strategy 3. Integrate local food production into the regional landscape	**Not Applicable**. This strategy is directed towards SCAG and does not apply to individual projects such as the project.
Promote a Green Region Strategy 4. Promote more resource efficient development focused on conservation, recycling and reclamation	**Consistent**. This strategy is directed towards SCAG and does not apply to individual projects such as the project. However, the project would reduce single-passenger vehicle trips and encourage and support transit, which would reduce transportation energy demand. In addition, the project would be required to comply with California Building Code Title 24. Energy saving and sustainable design would be incorporated throughout the project. The project would emphasize energy and water conservation, which would be achieved through the use of energy efficient HVAC and lighting systems, and energy star appliances, and low flow plumbing fixtures. The project would include pre-wiring for EV charging spaces for 30 percent of project's parking capacity for future use. Of the 30 percent EV parking spaces, 10 percent of the project's parking capacity would include installed chargers for immediate use by EV. The project would include trash collection that will facilitate separation of organic, recyclable, and non-recyclable trash streams, and diversion of at least 75 percent of construction and demolition waste from landfills.
Promote a Green Region Strategy 5. Preserve, enhance and restore regional wildlife connectivity	**Not Applicable**. This strategy is directed towards SCAG and does not apply to individual projects such as the project.
Promote a Green Region Strategy 6. Reduce consumption of resource areas, including agricultural land	**Consistent**. This strategy is directed towards SCAG and does not apply to individual projects such as the project. However, the project does not propose the conversion of any natural or agricultural lands to urban use. The project is located in an urban, infill site, and there are no natural or agricultural lands.

Goals and Policies	Consistency Assessment
Promote a Green Region Strategy 7. Identify ways to improve access to public park space	**Consistent**. This strategy is directed towards SCAG and does not apply to individual projects such as the project. However, the project will be responsible for Park Fees pursuant to LAMC Section 12.33 for the residential condominiums, which will contribute to the creation of public park space within the vicinity and the City. The project also includes 55,706 sf of open space for the residents and guests of the building and would fulfill this through a combination of common indoor open space, common outdoor open space, and private balconies.

Use Designation, Density, and Building Intensity

For the reasons stated below, the project is consistent with the general land use designation, density, and building intensity in the SCAG 2020-2045 RTP/SCS.

Land Use Designation

2016-2040 RTP/SCS

SCAG's 2016-2040 RTP/SCS contains SCAG's regional growth projections, goals, and policies, as well as a regional overview of projected land uses and development standards. Using data collected from local jurisdictions, including general plans, SCAG categorized existing land uses into land use types, then combined the land use types into 35 Place Types and classified subregions into one of three land use development categories (LDCs): Urban, Compact, or Standard. SCAG used these LDCs to describe the conditions that exist and/or are likely to exist within each specific area of the SCAG region. The project site is located within an "Urban" LDC and is forecasted to be in within an Urban LDC in 2040, respectively. Urban LDCs are often found within or directly adjacent to moderate and high-density urban areas. The 2016-2040 RTP/SCS defines the Urban LDC as the following:

These areas are often found within and directly adjacent to moderate and high-density urban centers. Nearly all urban growth in these areas would be considered infill or redevelopment. The majority of housing is multifamily and attached single-family (townhome), which tend to consume less water and energy than the larger types found in greater proportion in less urban locations. These areas are supported by high levels of regional and local transit service. They have well-connected street networks, and the mix and intensity of uses result in a highly walkable environment. These areas offer enhanced access and connectivity for people who choose not to drive or do not have access to a vehicle.

The project is located within a highly urbanized area within the City of Los Angeles, near Downtown Los Angeles. The project is an infill project that would provide mixed-use development with multi-family residential units, TORS units and neighborhood serving ground floor commercial uses. The project is located within a HQTA as defined by SCAG and within a TPA as defined by SB 743.

2020-2045 RTP/SCS

As noted above, in September 2020, the SCAG's Regional Council formally adopted the 2020–2045 RTP/SCS also known as the Connect SoCal. As noted in the 2020-2045 RTP/SCS, since 2008, there has been a substantial concentration and share of growth in high quality transit areas (HQTAs), Transit Priority Areas (TPAs), Specific Plan Areas, job centers, Neighborhood Mobility Areas (NMAs) and Livable Corridors.[4] The 2020-2045 RTP/SCS builds on this land use trend, and includes a set of strategies to guide integrated land use development decisions and transportation investments. The development patterns encouraged by the 2020-2045 RTP/SCS, where implemented by local jurisdictions, identify the distribution of growth in existing urbanized areas or suburban town centers and opportunity areas such as in TPAs and HQTAs.

The 2020-2045 RTP/SCS identified Priority Growth Areas (PGAs) where many land use strategies can be fully realized. These include TPAs, HQTAs, Neighborhood Mobility Areas (NMAs), and Livable Corridors. These categories are described below:

> **Transit Priority Areas:** TPAs are Priority Growth Areas that are within one half mile of existing or planned 'major' transit stops in the region. A 'major' transit stop is defined as a site containing an existing or planned rail or bus rapid 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. Although TPAs comprise less than one percent of Southern California's land area, around 35 percent of new households are projected to occur within these transit rich areas. *TPAs are where TOD can be realized – where people can live, work and play in higher density, compact communities with ready access to a multitude of safe and convenient transportation alternatives.*[5]
>
> **High Quality Transit Areas (HQTAs):** HQTAs are a walkable transit village or corridor, consistent with the adopted RTP/SCS, and is within one half-mile of a well- serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. A major transit stop is defined as a site containing a rail or bus rapid 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. HQTAs represent less than three percent of the region's acreage but are projected to accommodate nearly 55 percent of new households between 2016 and 2045. *Active transportation and new developments should be context-sensitive, responding to the existing physical conditions of the surrounding area. Sensitively designed TODs can preserve existing development patterns and neighborhood character while providing a balance of modal and housing choices.*[6]

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4 Southern California Association of Governments, 2020–2045 Regional Transportation Plan / Sustainable Communities Strategy, pg. 22.

5 2020-2045 RTP/SCS. Chapter 3. Page 51. https://www.connectsocal.org/Documents/Proposed/pfConnectSoCal-03-Plan.pdf. Accessed July 18, 2021.

6 2020-2045 RTP/SCS. Chapter 3. Page 51. https://www.connectsocal.org/Documents/Proposed/pfConnectSoCal-03-Plan.pdf. Accessed July 18, 2021

Neighborhood mobility area (NMAs): NMAs focus on creating, improving, restoring and enhancing safe and convenient connections to schools, shopping, services, places of worship, parks, greenways and other destinations. NMAs are PGAs with robust residential to non-residential land use connections, high roadway intersection densities and low-to-moderate traffic speeds. *NMAs support the principles of center focused placemaking. Fundamental to neighborhood scale mobility in urban, suburban and rural settings is encouraging "walkability," active transportation and short, shared vehicular trips on a connected network through increased density, mixed land uses, neighborhood design, enhanced destination accessibility and reduced distance to transit.*

Livable Corridors: The Livable Corridor strategy encourages local jurisdictions to plan and zone for increased density at nodes along key corridors, and to "redevelop" single-story under-performing retail with well-designed, higher density housing and employment centers. Growth at strategic nodes along key corridors, many of which are within HQTAs, will make transit a more convenient and viable option.

The Livable Corridors strategy is comprised of three components that will encourage context sensitive density, improve retail performance, combat disinvestment, and improve fiscal outcomes for local communities:

- *Transit improvements: Some corridors have been identified as candidates for on-street, dedicated lane Bus Rapid Transit (BRT) or semi-dedicated "BRT-lite" transit. Other corridors have the potential to support features that improve the user experience and bus performance, including enhanced bus shelters, real-time travel information, off-bus ticketing, all-door boarding and longer distances between stops to increase speeds.*

- *Active transportation improvements: Increased investments in Complete Streets within Livable Corridors and intersecting arterials are essential to support safe bicycling and walking. Investments should include protected lanes to encourage safe bicycling and lower speed mobility, improved pedestrian access and bicycle and micro-mobility parking.*

- *Land use policies: Mixed-use retail centers at key nodes along Livable Corridors are essential, as is increasing neighborhood-oriented retail at intersections, and flexible zoning that allows for the replacement of under-performing auto-oriented retail.*

The project would be consistent with these applicable PGA categories (Job Centers, HQTAs, NMAs, and Livable Corridors), as it would create neighborhood serving ground floor commercial, TORS, and multi-family residential as a compact infill development in a highly urbanized area of the City and locate housing and employment opportunities in close proximity to Downtown Los Angeles, with access to a robust transit network.

The project would provide new residential uses in a HQTA and a TPA as identified in the 2020-2045 RTP/SCS as shown in Figures 3-1 and 3-2. These are key areas identified by the 2020-2045 RTP/SCS to focus new growth and encourage transit-oriented development. As noted in the SCAG

2020-2045 RTP/SCS, HQTAs and TPAs are areas meant to include higher density projects in areas with infill potential and supported by existing infrastructure.

The project site is intended to provide a mixed-use building with TORS, residential condominium, and commercial uses that offers multiple transportation choices including bicycle, pedestrian, close access to transit infrastructure, commercial areas, services, and employment opportunities. The project site would be redeveloped to construct up to 319 multi-family condominium units, 160 TORS units and up to 3,429 sf of ground floor commercial uses. The project site is located in a highly walkable area surrounded by a diverse mix of land uses, including high- and mid-rise office buildings, residential buildings, hotels, retail and restaurant uses, museums, night clubs, theaters, cultural districts, warehouses, and light industrial uses. The project is also located near a number of transit opportunities including the nearby Metro Rail Pico Station (less than 0.3 miles from the project site), the 7th/Metro Center Station (approximately 0.7 mile from the project site) and the Metro Pershing Square Station (approximately 0.8 miles from the project site).

The project would also include bicycle parking spaces and would encourage pedestrian travel by enhancing the pedestrian amenities around the project site. The project's location near transit enables residents, TORS guests, and patrons of the project to reach surrounding services, jobs, and other destinations with relative ease and within a reasonable time, using a diverse array of transportation choices.

As such, the project would be a transit-oriented development that has been identified to be within a HQTA and TPA. These are targeted areas for future, higher density, transit-oriented development that supports transit uses. As such the project is consistent with the type of land use identified within these areas. As noted in the SCAG 2020-2045 RTP/SCS, SCAG's land use policies do not supersede the land use authority of cities and counties. The SCAG 2020-2045 RTP/SCS does not dictate local policies or strategies; applying the forecasted development pattern at the local level is the authority and responsibility of towns, cities and counties. While land use decisions are under the purview of the City of Los Angeles, the project would nevertheless be consistent with the land use strategy and land use type envisioned in the SCAG 2020-2045 RTP/SCS.

Density and Build Intensity

With the SCAG 2020-2045 RTP/SCS, SCAG's Scenario Planning Model (SPM) is a data management, land use planning, and modeling tool. SPM enables the creation and organization of local and regional data, plan and policies, facilitates scenario creation and editing and estimates a wide range of potential benefits resulting from alternative transportation and land use strategies. SCAG's SPM employs a series of Place Types to describe the different types of land uses in the region. The Place Types—each comprised of a mix of different building types along with assumptions about characteristics such as the amount of land devoted to streets, parks, and civic areas – represent the complete range of development types and patterns that make up a scenario. These Place Types contain a large amount of information relating to the characteristics of the landscape, including jobs and housing density, urban design, mix of land uses and are intended for modeling purposes.

SCAG also categorizes existing land uses into land use types. Land Development Categories (LDCs)—Urban, Compact, or Standard—represent distinct forms of land use, ranging from dense and walkable mixed-use urban areas well served by transit, to lower-intensity, less walkable places where land uses are segregated and most trips are made via automobile. These LDCs are an aggregation of the 35 Place Types and are used to describe the general conditions within a specific area. The Connect SoCal, Sustainable Communities Strategy Technical Report, forecasts LDCs by county and subregion for 2045.

The project site area is located within an "Urban" Land Development Category (LDC). The Urban LDC is the highest density and most intense land development category assessed in the Connect SoCal SCS. The Connect SoCal SCS describes the Urban Land Development Category as:

> *These areas are often found within and directly adjacent to moderate and high density urban centers. Virtually all 'Urban' growth would be considered infill or redevelopment. The majority of housing units are multifamily and attached single family (townhome), which tend to consume less water and energy than the larger types found in greater proportion in less urban locations. These areas are supported by high levels of regional and local transit service. Well-connected street networks and the mix of intensity of uses result in a highly walkable environment. Enhanced access and connectivity for people who choose not to drive or do not have access to a vehicle.7*

While SCAG does not identify a specific density and building intensity levels for individual land use parcels or areas within the SCAG 2020-2045 RTP/SCS, it does note that TPAs, where the project is located, are areas where TOD development can be realized in higher density, compact communities with ready access to a multitude of safe and convenient transportation alternatives. HQTAs are areas for sensitively designed transit-oriented development that can preserve existing development patterns and neighborhood character while providing a balance of modal and housing choices.

The project site is located within a highly urbanized area within the City of Los Angeles, within the Central City Community Plan area. The project would remove the existing vacant warehouse on the project site and construct a 40-story mixed-use building consisting of up to 319 residential condominium units; 160 TORS units; and approximately 3,429 square feet of ground floor commercial uses. The project would also include a landscaped podium amenity deck on Level 5, indoor multi-purpose rooms and amenity space on Level 39 and a landscaped amenity roof deck on Level 40. The project would feature an innovative awning design at the ground level. The awning would serve as a prominent architectural feature of the overall design that will provide shade and engage pedestrians at the street level. Above the awning, vertical timber-like beams would seamlessly extend vertically to screen above grade vehicle parking levels. Integrated with the beams, layers of opaque glazing, vertical fins, and landscaping would extend upwards, effectively screening the vehicles and preventing spillover lighting.

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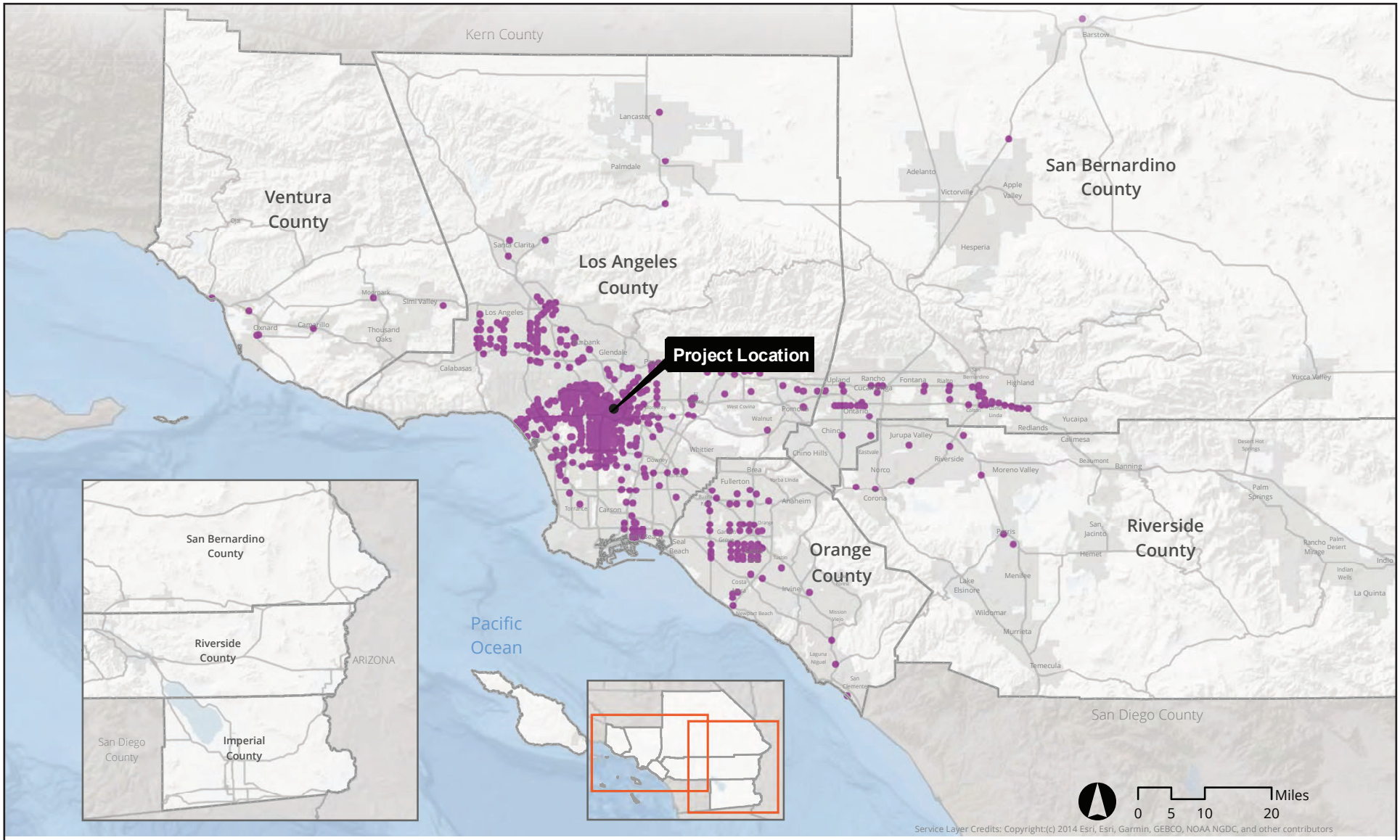
7 Connect SoCal, Sustainable Communities Strategy Technical Report, p.45.

The project would promote pedestrian and bicycling activity by developing a project site with a mix of uses that would, at the ground floor level, include commercial space and residential/TORS lobby and amenity space. The project would also provide ample bicycle parking spaces, including long-term and short-term spaces in compliance with the LAMC.

The project site is located within a TPA and HQTA as defined by SCAG[8] and as defined by SB 743, which supports transit opportunities and promotes a walkable environment. The project site is well served by public transit as it is located in close proximity of existing numerous bus lines, the Metro Rail Pico Station, 7th/Metro Center Station, and bicycle lanes. Additionally, the project site is served by a network of regional transportation facilities providing connectivity to the larger metropolitan area. Primary regional access is provided by Interstate (I) 10 and I-110. I-10 runs east-west and is approximately 0.5 mile south of the project site. I-110 runs north-south and is approximately 0.7 mile west of the project site. Major arterials serving the project site vicinity include 9th Street, Olympic Boulevard, and Pico Boulevard. South Hill Street and West 11th Street provide direct access to the project site. As such the project is highly connected by transit and the regional and local road network.

[8] https://www.connectsocal.org/Documents/Proposed/pfConnectSoCal-Plan.pdf, p. 34.



Transit Priority Areas (2045)

TPA

Note: Transit priority area (TPA) refers to an area within one-half mile of a major transit stop that is existing or planned. SCAG identifies major transit stops and transit priority areas using the methodology described in the Transit Technical Report. Major transit stops are extracted from 2045 plan year data of Connect SoCal.

Source: County Transportation Commissions, SCAG, 2019

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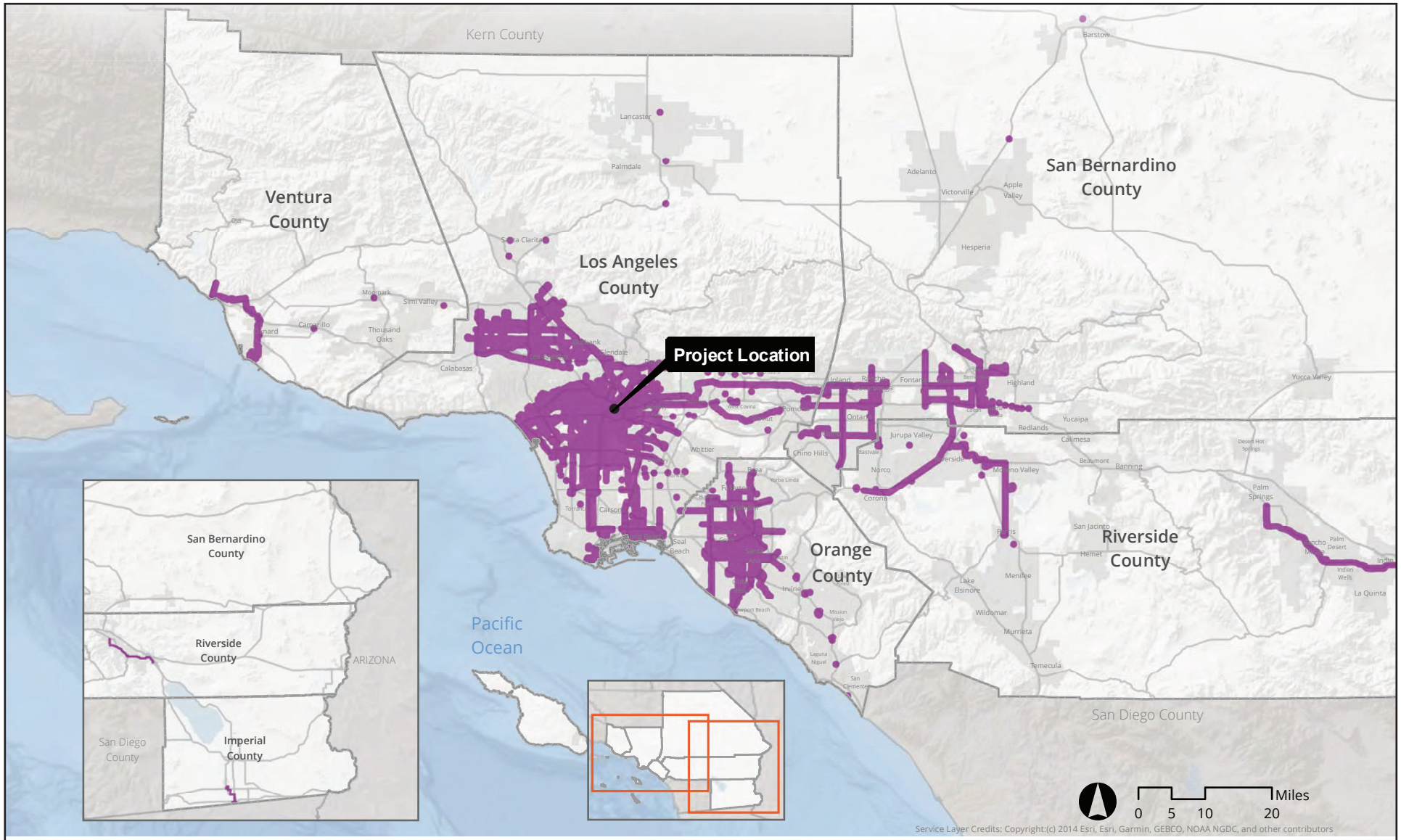
Figure 3-1
Transit Priority Areas (2045)
1111 South Hill Street Project



High Quality Transit Areas (2045)

HQTA

Source: County Transportation Commissions, SCAG, 2019

Note: SCAG's High Quality Transit Area (HQTA) is within one-half mile from major transit stops and high quality transit corridors (HQTC). SCAG identifies major transit stops and HQTCs using the methodology described in the Transit Technical Report. Major transit stops and HQTCs are extracted from 2045 plan year data of Connect SoCal.

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Figure 3-2
High Quality Transit Areas (2045)
1111 South Hill Street Project

Consistency with Criterion 2: Based on total building square footage, the project contains at least 50 percent residential use, and if project contains between 26 percent and 50 percent nonresidential uses, a floor area ratio of not less than 0.75.

Table 3-2 shows the proposed land uses, dwelling units, total square feet, FAR, and percentage of use for each site.

TABLE 3-2. PROPOSED LAND USE

Land Use	Units/Square Feet	Percentage of Use
Residential Condominiums	319 units 373,480 square feet	76%
Transient Occupancy Residential Structure Units	160 TORS units 115,068 square feet	23%
Commercial	3,429 square feet	1%
Total Floor Area (entire project)	491,977 square feet	100%
FAR	11.34:1	

As reported in Table 3-2, overall, the project includes a total floor area of approximately 491,977 square feet of floor area (FAR of 11.34:1) with 76 percent dedicated to residential uses. Residential uses would include approximately 373,480 square feet of floor area and up to 319 residential condominium dwelling units, including studios, one-, two-, and three-bedroom units, and three-bedroom penthouse units.

The project includes TORS use that compromises 23 percent of the total floor area, including 115,068 sf consisting of up to 160 units. New commercial space would be approximately 1 percent of the uses, as 3,429 sf of commercial space would be located at the ground level. As such, the project would be consistent with Criterion 2.

Consistency with Criterion 3: The project includes a minimum net density of at least 20 dwelling units per acre.

The project site consists of a pre-dedicated lot area of approximately 0.63 acres. When the project is complete, the post-dedicated lot area would be 0.61 acres. The project would provide up to 319 residential condominium dwelling units. Accordingly, the project's density would exceed the required net density of at least 20 dwelling units per acre. Therefore, the project would be consistent with Criterion 3.

Consistency with Criterion 4: The project site is located within one-half mile of a major transit stop or high-quality transit corridor included in the 2020-2045 RTP/SCS.

A major transit stop is defined 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" and is included in the applicable regional transportation plan (PRC Sections 21064.3 and 21155(b)). A high-quality transit corridor is "[a] corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours" (PRC Section 21155(b)).[9] The City of Los Angeles defines peak hours as between 6 a.m. and 9 a.m. and between 3 p.m. and 7 p.m.[10]

The project site is less than 0.3 mile northeast of the Metro Rail Pico Station, which serves the A (Blue) and E (Expo) lines and is, therefore, a major transit stop. As discussed above, the project site is located within a HQTA defined by SCAG and TPA under SB 375. Since the project site is located within 0.5 miles of a major transit stop, by its proximity to an existing rail transit station, it is not required to further demonstrate its proximity to intersecting bus routes or high-quality transit corridors that provide bus service intervals of 15 minutes or less. However, the project site is also served by multiple bus lines via stations at Olive Street/11th Street (serving the 14/37, 70, 71, 76, 78/79/378, and 96 lines), Hill Street/12th Street (serving the 83, 90/91, 94, Commuter Express 409, and Dash downtown D lines), and Broadway/11th Street (serving the 2/302, 4, and 745 lines). These locations provide intersecting bus routes with 15-minute headways or less in the peak hours. As such, the project would be consistent with this Criterion 4.

[9] https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PRC&sectionNum=21155. Accessed July 18, 2021.

[10] City of Los Angeles Transit Oriented Communities Affordable Housing Incentive Program Guidelines (TOC Guidelines) https://planning.lacity.org/ordinances/docs/toc/TOCGuidelines.pdf.

SECTION 4

Incorporation of Feasible Mitigation Measures, Performance Standards, and Criteria from Prior Applicable EIRs

Public Resources Code (PRC) Section 21155.2 and 21159.28(a) require that a TPP incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs, which for the project would include the 2020-2045 RTP/SCS Program Environmental Impact Report (RTP/SCS PEIR) for Southern California Association of Governments (SCAG). It is the intent of SCAG that lead agencies and others use the information contained within the PEIR in order to "tier" subsequent environmental documentation of projects in the region.

The Mitigation Monitoring and Reporting Program for the RTP/SCS PEIR (SCAG MMRP) does not include project level mitigation measures that are required to be incorporated into the project. However, the SCAG MMRP does provide a list of mitigation measures that SCAG determined a lead agency can and should consider, as applicable and feasible, where the lead agency has concluded that a project has the potential to result in significant effects. The City has complied with PRC Section 21155.2 and 21159.28.

The RTP/SCS PEIR serves as an informational document to inform decision-makers and the public of the potential environmental consequences of approving the proposed Plan. The RTP/SCS PEIR includes mitigation measures designed to help avoid or minimize significant environmental impacts. The RTP/SCS PEIR serves as a first-tier document for later CEQA review of individual projects included in the program.

Project-specific CEQA reviews, including this SCEA document, focus on project-specific impacts and mitigation measures, and need not repeat the broad analyses contained in the PEIR. As discussed by the California Supreme Court, "it is proper for a lead agency to use its discretion to focus a first-tier EIR on only the…program, leaving project-specific details to subsequent EIRs when specific projects are considered" (*In re Bay Delta Programmatic EIR Coordinated Proceedings* (2008) 43 Cal. 4th 1143, 1174).

The City has reviewed all mitigation measures contained in the RTP/SCS PEIR (and determined their applicability) to the project. For each such mitigation measure, the City considered whether to use the RTP/SCS PEIR mitigation measure or an equally effective City mitigation measure or federal, State, regional, or City regulation. The City's applicability determination is found in **Table 4-1**, *Project Consistency with 2020–2045 RTP/SCS Mitigation Measures*. As indicated in Table 4-1, the City has incorporated an equally or more effective City mitigation measure or federal, State, regional, or City regulation, or has for other reasons determined that incorporation of the SCAG 2020-2045 RTP/SCS MMRP mitigations measures is not required.

TABLE 4-1. PROJECT CONSISTENCY WITH 2020-2045 RTP/SCS PEIR MITIGATION MEASURES

Topic	2020-2045 RTP/SCS PEIR Mitigation Measures	Responsible Party	Applicability to Project
Aesthetics			
Impact AES-1: Potential for the Plan to have a substantial adverse effect on a scenic vista.	**SCAG Mitigation Measures** **SMM AES-1**: SCAG shall facilitate minimizing impacts to scenic vistas through cooperation, information sharing regarding the locations of designated scenic vistas, and regional program development as part of SCAG's ongoing regional planning efforts, such as web-based planning tools for local government including REVISION, and other GIS tools and data services, including, but not limited to, Map Gallery, GIS library, and GIS applications, and direct technical assistance efforts such as sharing of associated online training materials. Caltrans and lead agencies, such as county and city planning departments, shall be consulted during this update process.	SCAG	N/A
	Project Level Mitigation Measures **PMM AES-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts to scenic vistas, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Use a palette of colors, textures, building materials that are graffiti-resistant, and/or plant materials that complement the surrounding landscape and development. b) Use contour grading to better match surrounding terrain. Contour edges of major cut-and-fill to provide a more natural looking finished profile. c) Design new corridor landscaping to respect existing natural and man-made features and to complement the dominant landscaping of the surrounding areas. d) Replace and renew landscaping along corridors with road widenings, interchange projects, and related improvements. e) Retain or replace trees bordering highways, so that clear-cutting is not evident. f) Provide new corridor landscaping that respects and provides appropriate transition to existing natural and man-made features and is complementary to the dominant landscaping or native habitats of surrounding areas. g) Reduce the visibility of construction staging areas by fencing and screening these areas with low contrast materials consistent with the surrounding environment, and by revegetating graded slopes and exposed earth surfaces at the earliest opportunity;	Lead Agency	**This Mitigation Measure is not applicable to the project.** As set forth in Public Resources Code Section 21099, enacted by Senate Bill 743, provides that "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 project includes new residential condominiums, TORS units, and commercial uses in the diverse South Park neighborhood of downtown Los Angeles. The project site is located in a highly walkable area surrounded by a diverse mix of land uses, including high- and mid-rise office buildings, residential buildings, hotels, retail and restaurant uses, museums, night clubs, theaters, cultural districts, warehouses, and light industrial uses. The project is also located in an identified Transit Priority Area near a number of transit opportunities including the nearby Metro Rail Pico Station (less than 0.3 miles from the project site), the 7th/Metro Center Station (approximately 0.7 mile from the project site) and the Metro Pershing Square Station (approximately 0.8 miles from the project site). Therefore, the project

Topic	2020-2045 RTP/SCS PEIR Mitigation Measures	Responsible Party	Applicability to Project
	h) Use see-through safety barrier designs (e.g. railings rather than walls)		is located in a Transit Priority Area (TPA) as defined in Public Resources Code Section 21099. As such, no impact to scenic vistas would occur. The project's aesthetic impacts shall not be considered significant impacts on the environment pursuant to Public Resources Code Section 21099.
Impact AES-2: Potential to substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway	**SCAG Mitigation Measures**: See SMM AES-1.	SCAG	N/A
	Project Level Mitigation Measures: See PMM AES-1.	Lead Agency	**This Mitigation Measure is not applicable to the project**. As set forth immediately above, Public Resources Code Section 21099, enacted by Senate Bill 743, provides that "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." As per ZI No. 2452 and SB 743, aesthetic impacts to visual character/quality" shall not be considered significant impacts on the environment."
Impact AES-3: Potential to substantially degrade the existing visual character or quality of public views (public views are those that are experienced from publicly accessible vantage points). In an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality.	**SCAG Mitigation Measures**: See SMM AES-1.	SCAG	N/A
	Project Level Mitigation Measures **PMM AES-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts that substantially degrade visual character, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Minimize contrasts in scale and massing between the projects and surrounding natural forms and development, minimize their intrusion into important viewsheds, and use contour grading to better match surrounding terrain in accordance with county and city hillside ordinances, where applicable. b) Design landscaping along highway corridors to add significant natural elements and visual interest to soften the hard-edged, linear transportation corridors.	Lead Agency	**This Mitigation Measure is not applicable to the project**. As set forth immediately above, Public Resources Code Section 21099, enacted by Senate Bill 743, provides that "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." As per ZI No. 2452 and SB 743, aesthetic impacts to visual character/quality" shall not be considered significant impacts on the environment." Nevertheless, the project would substantially conform to this mitigation measure. The project site is currently developed with a vacant

Topic	2020-2045 RTP/SCS PEIR Mitigation Measures	Responsible Party	Applicability to Project
	c) Require development of design guidelines for projects that make elements of proposed buildings/facilities visually compatible or minimize visibility of changes in visual quality or character through use of hardscape and softscape solutions. Specific measures to be addressed include setback buffers, landscaping, color, texture, signage, and lighting criteria. d) Design projects consistent with design guidelines of applicable general plans. e) Require that sites are kept in a blight/nuisance-free condition. Remove blight or nuisances that compromise visual character or visual quality of project areas including graffiti abatement, trash removal, landscape management, maintenance of signage and billboards in good condition, and replace compromised native vegetation and landscape. f) Where sound walls are proposed, require sound wall construction and design methods that account for visual impacts as follows: • use transparent panels to preserve views where sound walls would block views from residences; • use landscaped earth berm or a combination wall and berm to minimize the apparent sound wall height; • construct sound walls of materials whose color and texture complements the surrounding landscape and development; g) Design sound walls to increase visual interest, reduce apparent height, and be visually compatible with the surrounding area; and landscape the sound walls with plants that screen the sound wall, preferably with either native vegetation or landscaping that complements the dominant landscaping of surrounding areas.		warehouse building. The project is located in a highly urbanized area in the City of Los Angeles; therefore, the applicable threshold with respect to the project is consistency with applicable zoning and other regulations governing scenic quality. The project site would not conflict with applicable zoning and regulations that govern scenic quality. The project would be consistent with the applicable design related policies with the General Plan Framework Element, Central City Community Plan, and the Downtown Design Guide. The project would develop a new mixed-use building that would enhance the existing project site and blend with the urban fabric of downtown Los Angeles that includes numerous high rise development and active uses. The project would not include the development of billboards, or extensive signage. The project design aims to integrate nature into the built environment and blend with the existing urban fabric while including landscaping and integration of greenery into the project design. The design composition emphasizes pedestrian-scale features such as street trees and landscaping, an architectural awning, and ground-floor commercial/restaurant uses add visual interest and soften the built components. The awning would serve as a prominent architectural feature of the overall design that will provide shade and engage pedestrians at the street level. The project would be consistent with applicable policies governing scenic quality, and would not conflict with applicable zoning or other regulations governing scenic quality and impacts to historic resources in the project area,

Topic	2020-2045 RTP/SCS PEIR Mitigation Measures	Responsible Party	Applicability to Project
			and impacts would be less than significant.
Impact AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.	**SCAG Mitigation Measures** **SMM AES-2**: SCAG shall facilitate minimizing impacts on aesthetics related to new sources of light or glare through cooperation, information sharing regarding guidelines and policies, design approaches, building materials, siting, and technology, such as web-based planning tools for local government including CA LOTS, and other GIS tools and data services, including, but not limited to, Map Gallery, GIS library, and GIS applications, and direct technical assistance efforts and sharing of associated online training materials. Lead agencies, such as county and city planning departments, shall be consulted during this update process.	SCAG	N/A
	Project Level Mitigation Measures **PMM AES-3**: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts that substantially degrade visual character, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Use lighting fixtures that are adequately shielded to a point below the light bulb and reflector and that prevent unnecessary glare onto adjacent properties. b) Restrict the operation of outdoor lighting for construction and operation activities to the hours of 7:00 a.m. to 10:00 p.m. c) Use high-pressure sodium and/or cut-off fixtures instead of typical mercury-vapor fixtures for outdoor lighting. d) Use unidirectional lighting to avoid light trespass onto adjacent properties. e) Design exterior lighting to confine illumination to the project site, and/or to areas which do not include light-sensitive uses. f) Provide structural and/or vegetative screening from light-sensitive uses. g) Shield and direct all new street and pedestrian lighting away from light-sensitive off-site uses. h) Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces. i) Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties.	Lead Agency	**This Mitigation Measure is not applicable to the project.** As set forth above, Public Resources Code Section 21099, enacted by Senate Bill 743, provides that "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." As per ZI No. 2452 and SB 743, aesthetic impacts to light/glare/shade "shall not be considered significant impacts on the environment." Nevertheless, the project substantially conforms to this mitigation measure. The project includes appropriate levels of interior and exterior lighting for security, parking, and architectural highlighting. Outdoor lighting would be designed and installed with shielding, such that lighting would be directed and focused on the project in accordance with LAMC lighting regulations that require that operational lighting would be directed downward or on the specific on-site feature to be lit and avoid direct glare onto exterior glazed windows or glass doors of existing and adjacent uses. Proposed signage and outdoor lighting would be subject to applicable regulations contained within the LAMC.

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			Most notably, LAMC Section 93.0117(b) limits lighting intensity or direct glare onto exterior glazed windows or glass doors on any property containing residential units; elevated habitable porch, deck, or balcony on any property containing residential units; or any ground surface intended for uses such as recreation, barbecue or lawn areas or any other property containing a residential unit or units. In accordance with City requirements, the exterior of the project would use materials such as high-performance and/or low-reflective glass (no mirror-like tints or films) and pre-cast concrete or fabricated wall surfaces that would minimize glare and reflected heat.
Agriculture and Forestry			
Impact AG-1: Potential for the Plan to 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 nonagricultural use.	**SCAG Mitigation Measures** **SMM AG-1**: SCAG shall host a Natural & Farm Lands Conservation Working Group which will provide a forum for stakeholders to share best practices and develop recommendations for natural and agricultural land conservation throughout the region, including the development and implementation of Connect SoCal's Natural and Farm Lands Conservation Strategies. **SMM AG-2**: SCAG shall develop a Regional Greenprint, which is a strategic web-based conservation tool that provides the best available scientific data and scenario visualizations to help cities, counties and transportation agencies make better land use and transportation infrastructure decisions and conserve natural and farm lands. SCAG shall use the Greenprint to identify priority conservation areas and work with CTCs to develop advanced mitigation programs or include them in future transportation measures by (1) funding pilot programs that encourage advance mitigation including data and replicable processes, (2) participating in state level efforts that would support regional advanced mitigation planning in the SCAG region, and (3) supporting the inclusion of advance mitigation programs at county level transportation measures. **SMM AG-3**: SCAG shall align with funding opportunities and pilot programs to begin implementation of conservation strategies through (1) seeking planning and implementation funds, such as Greenhouse Gas Reduction Funds that could advance local action on acquisition and restoration projects locally and regionally, (2) supporting CTCs and other partners, and (3) continuing policy	SCAG	N/A

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	alignment with the State Wildlife Action Plan 2015 Update and its implementation. **SMM AG-4**: SCAG shall provide incentives to jurisdictions that cooperate across county lines to protect and restore natural habitat corridors, especially where corridors cross county boundaries, as detailed in the Natural & Farmlands Technical Report strategies of Connect SoCal. SCAG will work with stakeholders to identify incentives and leverage resources that help protect habitat corridors.		
	Project Level Mitigation Measures **PMM AG-1**: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to address potential adverse effects on agricultural resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Require project sponsors to mitigate for loss of farmland by providing permanent protection of in-kind farmland in the form of easements, fees, or elimination of development rights/potential. b) Project relocation or corridor realignment to avoid Prime Farmland, Unique Farmland, or Farmland of Local or Statewide Importance. c) Maintain and expand agricultural land protections such as urban growth boundaries. d) Provide for mitigation fees to support a mitigation bank that invests in farmer education, agricultural infrastructure, water supply, marketing, etc. that enhance the commercial viability of retained agricultural lands. e) Minimize severance and fragmentation of agricultural land by constructing underpasses and overpasses at reasonable intervals to provide property access. f) Use berms, buffer zones, setbacks, and fencing to reduce conflicts between new development and farming uses and protect the functions of farmland.	Lead Agency	**This Mitigation Measure is not applicable to the project.** The project site is currently fully developed and is located in an urbanized setting, and there is no farmland or agricultural activity on the project site or in the vicinity.
Impact AG-2: Potential for the Plan to conflict with existing zoning for agricultural use, or a Williamson Act Contract	**SCAG Mitigation Measures:** See SMM AG-1 through SMM AG-4.	SCAG	N/A
	Project Level Mitigation Measures: See PMM AG-1. **PMM AG-2**: Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects on Williamson Act contracts to the maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures:	Lead Agency	**This Mitigation Measure is not applicable to the project.** The project site is not zoned for agricultural production, there is no farmland at the project site, and there are no Williamson Act Contracts in effect for the project site.

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	a) Project relocation or corridor realignment to avoid lands in Williamson Act contracts. b) Establish conservation easements consistent with the recommendations of the Department of Conservation, or 20-year Farmland Security Zone contracts (Government Code Section 51296 et seq.), 10-year Williamson Act contracts (Government Code Section 51200 et seq.), or use of other conservation tools available from the California Department of Conservation Division of Land Resource Protection.		
Impact AG-3: Potential for the Plan to 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)).	**SCAG Mitigation Measures:** See SMM AG-1 through SMM AG-2.	SCAG	N/A
	Project Level Mitigation Measures **PMM AG-3:** Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland to maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures: a) Minimize construction related impacts to agricultural and forestry resources by locating materials and stationary equipment in such a way as to prevent conflict with agriculture and forestry resources.	Lead Agency	**This Mitigation Measure is not applicable to the project.** The project site is not zoned for agricultural production, there is no farmland at the Project Site, and there are no Williamson Act Contracts in effect for the project site.
Impact AG-4: Potential for the Plan to result in the loss of forest land or conversion of forest land to non-forest use.	**SCAG Mitigation Measures:** See SMM AG-1 through SMM AG-2.	SCAG	N/A
	Project Level Mitigation Measures: See PMM AG-3.	Lead Agency	**This Mitigation Measure is not applicable to the project.** The project site is currently fully developed and located in an urban environment.
Impact AG-5: Potential for the Plan to 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.	**SCAG Mitigation Measures:** See SMM AG-1 through SMM AG-2 and SMM-GHG-1 through SMM-GHG-5.	SCAG	N/A
	Project Level Mitigation Measures: See PMM AG-2 and PMM GHG-2. **PMM AG-4:** Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland, to the maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures: a) Design proposed projects to minimize, to the greatest extent feasible, the loss of the highest valued agricultural land. b) Redesign project features to minimize fragmenting or isolating Farmland. Where a project involves acquiring land or easements, ensure that the remaining non-project area is of a size sufficient to allow economically viable farming operations. The project proponents shall be responsible for acquiring	Lead Agency	**This Mitigation Measure is not applicable to the project.** The project site is currently fully developed with a vacant warehouse building, and is not used for any agricultural uses and is not forest land; therefore, no agricultural use or forest land will be converted.

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	easements, making lot line adjustments, and merging affected land parcels into units suitable for continued commercial agricultural management. c) Reconnect utilities or infrastructure that serve agricultural uses if these are disturbed by project construction. If a project temporarily or permanently cuts off roadway access or removes utility lines, irrigation features, or other infrastructure, the project proponents shall be responsible for restoring access as necessary to ensure that economically viable farming operations are not interrupted. **PMM AG-5:** Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland, to the maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures: a) Manage project operations to minimize the introduction of invasive species or weeds that may affect agricultural production on adjacent agricultural land. Where a project has the potential to introduce sensitive species or habitats or have other spill-over effects on nearby agricultural lands, the project proponents shall be responsible for acquiring easements on nearby agricultural land and/or financially compensating for indirect effects on nearby agricultural land. Easements (e.g., flowage easements) shall be required for temporary or intermittent interruption in farming activities (e.g., because of seasonal flooding or groundwater seepage). Acquisition or compensation would be required for permanent or significant loss of economically viable operations.		
Air Quality			
Impact AQ-1: Conflict with or obstruct implementation of the applicable air quality plan.	No mitigation required.	NA	N/A
Impact AQ-2: Potential to violate any air quality standard or contribute substantially to an existing or projected air quality violation.	**SCAG Mitigation Measures** **SMM AQ-1:** SCAG shall develop the Southern California Disadvantaged Communities Planning Initiative which would provide funds to selected applicants to develop a low-cost, high-impact model which leverages SCAG's staff, data, and outreach resources to deliver context-sensitive plans in high-need, low-resourced active transportation infrastructure and frameworks. As part of the initiative, the model will be operationalized through the development of plans in six communities and refined to provide a sustainable resource for SCAG staff partner with local agencies to develop local active transportation plans. **SMM AQ-2:** SCAG shall continue its commitment to analyze public health outcomes as part of Connect SoCal. As part of the public health analysis for the Plan, SCAG shall continue to analyze the Plan's impacts on air quality	SCAG	N/A

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	through its Public Health Working group and continue to support policy change at the city and country level through education programs. **SMM AQ-3:** SCAG shall continue to conduct air quality-related technical analyses on the region, specifically in vulnerable areas that are typically environmental justice areas. For example, SCAG staff conducted technical analysis of emissions impacts on populations within 500 feet of freeways and highly travelled corridors in the Connect SoCal Environmental Justice Appendix. SCAG staff shall also continue to work with districts and relevant stakeholders to be informed of any updates new and/or changes to air quality issue areas through various forums like the Environmental Justice Working Group.		
	Project Level Mitigation Measures **PMM AQ-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to violating air quality standards. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Minimize land disturbance. b) Suspend grading and earth moving when wind gusts exceed 25 miles per hour unless the soil is wet enough to prevent dust plumes. c) Cover trucks when hauling dirt. d) Stabilize the surface of dirt piles if not removed immediately. e) Limit vehicular paths on unpaved surfaces and stabilize any temporary roads. f) Minimize unnecessary vehicular and machinery activities. g) Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway. h) Revegetate disturbed land, including vehicular paths created during construction to avoid future off-road vehicular activities. i) On Caltrans projects, Caltrans Standard Specifications 10-Dust Control, 17-Watering, and 18- Dust Palliative shall be incorporated into project specifications. j) Require contractors to assemble a comprehensive inventory list (i.e., make, model, engine year, horsepower, emission rates) of all heavy-duty off-road (portable and mobile) equipment (50 horsepower and greater) that could be used an aggregate of 40 or more hours for the construction project. Prepare a plan for approval by the applicable air district demonstrating achievement of	Lead Agency	**This Mitigation Measure is incorporated through compliance with regulatory compliance measures and incorporation of project design features.** As set forth in the 2020-2045 RTP/SCS, the project would comply existing regulatory compliance measures promulgated by CARB and the South Coast Air Quality Management District (SCAQMD). **RCM-AQ-1** Site Clearing, Grading and Construction Activities: • Compliance with provisions of the SCAQMD District Rule 403. The project shall comply with all applicable standards of the Southern California Air Quality Management District, including the following provisions of District Rule 403: • All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent. • The construction area shall be kept sufficiently dampened to control dust caused by grading and

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	the applicable percent reduction for a CARB-approved fleet. Daily logging of the operating hours of the equipment should also be required. k) Ensure that all construction equipment is properly tuned and maintained. l) Minimize idling time to 5 minutes or beyond regulatory requirements—saves fuel and reduces emissions. m) Provide an operational water truck on-site at all times. Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas. Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway. n) Utilize existing power sources (e.g., power poles) or clean fuel generators rather than temporary power generators. o) Develop a traffic plan to minimize community impacts as a result of traffic flow interference from construction activities. The plan may include advance public notice of routing, use of public transportation, and satellite parking areas with a shuttle service. Schedule operations affecting traffic for off-peak hours. Minimize obstruction of through-traffic lanes. Provide a flag person to guide traffic properly and ensure safety at construction sites. Project sponsors should consider developing a goal for the minimization of community impacts. p) As appropriate require that portable engines and portable engine-driven equipment units used at the project work site, with the exception of on-road and off-road motor vehicles, obtain CARB Portable Equipment Registration with the state or a local district permit. Arrange appropriate consultations with the CARB or the District to determine registration and permitting requirements prior to equipment operation at the site. q) Require projects to use Tier 4 Final equipment or better for all engines above 50 horsepower (hp). In the event that construction equipment cannot meet to Tier 4 Final engine certification, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is approved by SCAG before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, construction equipment with Tier 4 Interim or reduction in the number and/or horsepower rating of construction equipment and/or limiting the number of construction equipment operating at the same time. All equipment must be tuned and maintained in compliance with the manufacturer's recommended maintenance schedule and specifications. All maintenance records for each equipment and their contractor(s) should make available for inspection and remain on-site for a period of at least two years from completion of construction, unless the individual project can demonstrate that Tier 4 engines would not be required to mitigate emissions below significance thresholds. Project sponsors should also consider including ZE/ZNE technologies where appropriate and feasible.		hauling, and at all times provide reasonable control of dust caused by wind. • All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust. • All dirt/soil loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust. • All dirt/soil materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust. • General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. • Trucks having no current hauling activity shall not idle but be turned off. **RCM-AQ-2** In accordance with Sections 2485 in Title 13 of the California Code of Regulations, the idling of all diesel fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location. **RCM-AQ-3** In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards. In addition to the above regulatory compliance measures, as part of the project the following PDF would be implemented:

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	r) Projects located within the South Coast Air Basin should consider applying for South Coast AQMD "SOON" funds which provides funds to applicable fleets for the purchase of commercially available low-emission heavy-duty engines to achieve near-term reduction of NOx emissions from in-use off-road diesel vehicles. s) Projects located within AB 617 communities should review the applicable Community Emissions Reduction Plan (CERP) for additional mitigation that can be applied to individual projects. t) Where applicable, projects should provide information about air quality related programs to schools, including the Environmental Justice Community Partnerships (EJCP), Clean Air Ranger Education (CARE), and Why Air Quality Matters programs. u) Projects should work with local cities and counties to install adequate signage that prohibits truck idling in certain locations (e.g., near schools and sensitive receptors). v) As applicable for airport projects, the following measures should be considered: • Considering operational improvements to reduce taxi time and auxiliary power unit usage, where feasible. Additionally, consider single engine taxing, if feasible as allowed per Federal Aviation Administration guidelines. • Set goals to achieve a reduction in emissions from aircraft operations over the lifetime of the proposed project. • Require the use of ground service equipment (GSE) that can operate on battery-power. If electric equipment cannot be obtained, require the use of alternative fuel, the cleanest gasoline equipment, or Tier 4, at a minimum. w) As applicable for port projects, the following measures should be considered: • Develop specific timelines for transitioning to zero emission cargo handling equipment (CHE). • Develop interim performance standards with a minimum amount of CHE replacement each year to ensure adequate progress. • Use short side electric power for ships, which may include tugboats and other ocean-going vessels or develop incentives to gradually ramp up the usage of shore power. • Install the appropriate infrastructure to provide shore power to operate the ships. Electrical hookups should be appropriately sized. • Maximize participation in the Port of Los Angeles' Vessel Speed Reduction Program or the Port of Long Beach's Green Flag Initiation Program in		**PDF-AQ-1**: The following measure will be employed by the project to minimize construction-related emissions: • The project shall obtain concrete for use during the concrete-pour phase of construction from local concrete suppliers located within a 7-mile radius of the project site.

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	order to reduce the speed of vessel transiting within 40 nautical miles of Point Fermin. • Encourage the participation in the Green Ship Incentives. • Offer incentives to encourage the use of on-dock rail. x. As applicable for rail projects, the following measures should be considered: • Provide the highest incentives for electric locomotives and then locomotives that meet Tier 5 emission standards with a floor on the incentives for locomotives that meet Tier 4 emission standards. y. Projects that will introduce sensitive receptors within 500 feet of freeways and other sources should consider installing high efficiency of enhanced filtration units, such as Minimum Efficiency Reporting Value (MERV) 13 or better. Installation of enhanced filtration units can be verified during occupancy inspection prior to the issuance of an occupancy permit. z. Develop an ongoing monitoring, inspection, and maintenance program for the MERV filters. • Disclose potential health impacts to prospective sensitive receptors from living in close proximity to freeways or other sources of air pollution and the reduced effectiveness of air filtration systems when windows are open or residents are outside. • Identify the responsible implementing and enforcement agency to ensure that enhanced filtration units are installed on-site before a permit of occupancy is issued. • Disclose the potential increase in energy costs for running the HVAC system to prospective residents. • Provide information to residents on where MERV filters can be purchased. • Provide recommended schedule (e.g., every year or every six months) for replacing the enhanced filtration units. • Identify the responsible entity such as future residents themselves, Homeowner's Association, or property managers for ensuring enhanced filtration units are replaced on time. • Identify, provide, and disclose ongoing cost-sharing strategies, if any, for replacing the enhanced filtration units. • Set criteria for assessing progress in installing and replacing the enhanced filtration units; and • Develop a process for evaluating the effectiveness of the enhanced filtration units. aa) Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities.		

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	bb) The following criteria related to diesel emissions shall be implemented on by individual project sponsors as appropriate and feasible: • Diesel nonroad vehicles on site for more than 10 total days shall have either (1) engines that meet EPA on road emissions standards or (2) emission control technology verified by EPA or CARB to reduce PM emissions by a minimum of 85%. • Diesel generators on site for more than 10 total days shall be equipped with emission control technology verified by EPA or CARB to reduce PM emissions by a minimum of 85%. • Nonroad diesel engines on site shall be Tier 2 or higher. • Diesel nonroad construction equipment on site for more than 10 total days shall have either (1) engines meeting EPA Tier 4 nonroad emissions standards or (2) emission control technology verified by EPA or CARB for use with nonroad engines to reduce PM emissions by a minimum of 85% for engines for 50 hp and greater and by a minimum of 20% for engines less than 50 hp. • Emission control technology shall be operated, maintained, and serviced as recommended by the emission control technology manufacturer. • Diesel vehicles, construction equipment, and generators on site shall be fueled with ultra-low sulfur diesel fuel (ULSD) or a biodiesel blend approved by the original engine manufacturer with sulfur content of 15 ppm or less. • The construction contractor shall maintain a list of all diesel vehicles, construction equipment, and generators to be used on site. The list shall include the following: i. Contractor and subcontractor name and address, plus contact person responsible for the vehicles or equipment. ii. Equipment type, equipment manufacturer, equipment serial number, engine manufacturer, engine model year, engine certification (Tier rating), horsepower, engine serial number, and expected fuel usage and hours of operation. iii. For the emission control technology installed: technology type, serial number, make, model, manufacturer, EPA/CARB verification number/level, and installation date and hour-meter reading on installation date. • The contractor shall establish generator sites and truck-staging zones for vehicles waiting to load or unload material on site. Such zones shall be located where diesel emissions have the least impact on abutters, the general public, and especially sensitive receptors such as hospitals, schools, daycare facilities, elderly housing, and convalescent facilities.		

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	• The contractor shall maintain a monthly report that, for each on road diesel vehicle, nonroad construction equipment, or generator onsite, includes: i. Hour-meter readings on arrival on-site, the first and last day of every month, and on off-site date. ii. Any problems with the equipment or emission controls. iii. Certified copies of fuel deliveries for the time period that identify: 1. Source of supply 2. Quantity of fuel 3. Quantity of fuel, including sulfur content (percent by weight) cc) Project should exceed Title-24 Building Envelope Energy Efficiency Standards (California Building Standards Code). The following measures can be used to increase energy efficiency: • Install programmable thermostat timers • Obtain Third-party HVAC commissioning and verification of energy savings (to be grouped with exceedance of Title 24). • Install energy efficient appliances (Typical reductions for energy-efficient appliances can be found in the Energy Star and Other Climate Protection Partnerships Annual Reports.) • Install higher efficacy public street and area lighting □ Limit outdoor lighting requirements • Replace traffic lights with LED traffic lights • Establish onsite renewable or carbon neutral energy systems – generic, solar power and wind power • Utilize a combined heat and power system • Establish methane recovery in Landfills and Wastewater Treatment Plants. • Locate project near bike path/bike lane • Provide pedestrian network improvements, such as interconnected street network, narrower roadways and shorter block lengths, sidewalks, accessibility to transit and transit shelters, traffic calming measures, parks and public spaces, minimize pedestrian barriers. • Provide traffic calming measures, such as: i. Marked crosswalks ii. Count-down signal timers iii. Curb extensions iv. Speed tables v. Raised crosswalks vi. Raised intersections		

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	vii. Median islands viii. Tight corner radii ix. Roundabouts or mini-circles x. On-street parking xi. Chicanes/chokers • Create urban non-motorized zones • Provide bike parking in non-residential and multi-unit residential projects Dedicate land for bike trails • Limit parking supply through: i. Elimination (or reduction) of minimum parking requirements ii. Creation of maximum parking requirements iii. Provision of shared parking • Require residential area parking permit. • Provide ride-sharing programs i. Designate a certain percentage of parking spacing for ride sharing vehicles ii. Designating adequate passenger loading and unloading and waiting areas for ride-sharing vehicles iii. Providing a web site or messaging board for coordinating rides iv. Permanent transportation management association membership and finding requirement.		
Impact AQ-3: 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.	**SCAG Mitigation Measures:** See SMM AQ-1, SMM AQ-2, SMM, and SMM AQ-3.	SCAG	N/A
	Project Level Mitigation Measures: See PMM-AQ-1.	Lead Agency	**This Mitigation Measure is incorporated through compliance with regulatory compliance measures and incorporation of project design features.** As discussed in Section 6.3, Air Quality, the project's cumulative impact with respect to air quality would be less than significant and would not be cumulatively considerable.
Impact AQ-4: Expose sensitive receptors to substantial pollutant concentrations.	**SCAG Mitigation Measures**: See SMM AQ-1, SMM AQ-2, SMM, and SMM AQ-3.	SCAG	N/A
	Project Level Mitigation Measures: See PMM-AQ-1.	Lead Agency	**This Mitigation Measure is incorporated through compliance**

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			with regulatory compliance measures and incorporation of project design features. The project's impact related to exposure of sensitive receptors to substantial pollutant concentrations would be less than significant, and no mitigation measures are required.
Impact AQ-4: Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.	No mitigation is required.	NA	N/A
Biological Resources			
Impact BIO-1: Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service.	**SCAG Mitigation Measures** **SMM BIO-1:** SCAG shall facilitate reducing future impacts to species identified as a candidate, sensitive, or special status species and its habitats through cooperation, information sharing, and program development. SCAG shall consult with the resource agencies, such as the USFWS, NMFS, USACE, USFS, BLM, and CDFW, as well as local jurisdictions including cities and counties, to incorporate designated critical habitat, federally protected wetlands, the protection of sensitive natural communities and riparian habitats, designated open space or protected wildlife habitat, local policies and tree preservation ordinances, applicable HCPs and NCCPs, or other related planning documents into SCAG's ongoing regional planning efforts and programs such as, web-based planning tools for local government including CA LOTS, and other GIS tools and data services, including, but not limited to, Map Gallery, GIS library, and GIS applications, and direct technical assistance efforts and sharing of associated online Training materials. Planning efforts shall be consistent with the approach outlined in the California Wildlife Action Plan. Additionally, SCAG's shall vet and distribute environmental data (i.e., endangered species and important habitat areas) to local jurisdictions. **SMM BIO-2:** SCAG shall continue to develop a regional conservation strategy in coordination with local jurisdictions and other stakeholders, including the county transportation commissions. The conservation strategy will build upon existing efforts including those at the sub-regional and local levels to identify potential priority conservation areas. SCAG will also collaborate with stakeholders to establish a new Regional Advanced Mitigation Program (RAMP) initiative to preserve habitat. The RAMP would establish and/or supplement regional conservation and mitigation banks and/or other approaches to offset the impacts of transportation and other development projects. To assist in defining the RAMP, SCAG shall lead a multi-year effort to develop new regional tools, like the Regional Data Platform and Regional Greenprint that will provide an easily accessible resource to help	SCAG	N/A

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	municipalities, conservation groups, developers and researchers prioritize lands for conservation based on best available scientific data. The Regional Greenprint effort shall also produce a whitepaper on the RAMP initiative, which includes approaches for the RAMP in the SCAG region, needed science and analysis, models, challenges and opportunities and recommendations.		
	Project Level Mitigation Measures **PMM BIO-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to threatened and endangered species, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Require project design to avoid occupied habitat, potentially suitable habitat, and designated critical habitat, wherever practicable and feasible. b) Where avoidance is determined to be infeasible, provide conservation measures to fulfill the requirements of the applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal ESA, Section 2081 of the California ESA to support issuance of an incidental take permit, and/or as identified in local or regional plans. Conservation strategies to protect the survival and recovery of federally and state-listed endangered and local special status species may include: • Impact minimization strategies • Contribution of in-lieu fees for in-kind conservation and mitigation efforts • Use of in-kind mitigation bank credits • Funding of research and recovery efforts • Habitat restoration • Establishment of conservation easements • Permanent dedication of in-kind habitat c) Design projects to avoid desert native plants protected under the California Desert Native Plants Act, salvage and relocate desert native plants, and/or pay in lieu fees to support off-site long- term conservation strategies. d) Temporary access roads and staging areas will not be located within areas containing sensitive plants, wildlife species or native habitat wherever feasible, so as to avoid or minimize impacts to these species. e) Develop and implement a Worker Environmental Awareness Program (environmental education) to inform project workers of their responsibilities to avoid and minimize impacts on sensitive biological resources.	Lead Agency	**This Mitigation Measure is incorporated through compliance with regulatory compliance measures.** The project site does not contain any critical habitat or support any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. The project site is located in an urbanized area of the City. There are no protected trees on the project site. There are six existing street trees surrounding the project: three existing Chinese Flame trees along 11th Street and three existing Canary Island Pine trees along South Hill Street. The project would remove one Canary Island Pine and would provide two new Canary Island Pine trees along South Hill Street, resulting in a total of seven street trees after completion of the project. Furthermore, the new street trees would be included as part of 120 new trees planted on the project site. Nevertheless, the City has required the following regulatory compliance measures which are consistent with the RTP/SCS PEIR mitigation measures, as it is equal to or more effective than RTP/SCS PEIR MM-BIO-1 with regard to avoiding potentially significant effects related to nesting native birds that are in the jurisdiction and responsibility of the City: **RCM-BIO-1**: Tree Removal (Public Right-of-Way). Removal of trees in the public right-of way requires approval by

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	f) Retain a qualified botanist to document the presence or absence of special status plants before project implementation. g) Appoint a qualified biologist to monitor construction activities that may occur in or adjacent to occupied sensitive species' habitat to facilitate avoidance of resources not permitted for impact. h) Appoint a qualified biologist to monitor implementation of mitigation measures. i) Schedule construction activities to avoid sensitive times for biological resources (e.g. steelhead spawning periods during the winter and spring, nesting bird season) and to avoid the rainy season when erosion and sediment transport is increased. j) Develop an invasive species control plan associated with project construction. k) If construction occurs during breeding seasons in or adjacent to suitable habitat, include appropriate sound attenuation measures required for sensitive avian species and other best management practices appropriate for potential local sensitive wildlife. l) Conduct pre-construction surveys to delineate occupied sensitive species' habitat to facilitate avoidance. m) Where projects are determined to be within suitable habitat and may impact listed or sensitive species that have specific field survey protocols or guidelines outlined by the USFWS, CDFW, or other local agency, conduct preconstruction surveys that follow applicable protocols and guidelines and are conducted by qualified and/or certified personnel. n) Project design should address the protection of habitat on both sides of a freeway to improve effectiveness of the crossings. o) Project sponsors shall consider the impacts of nitrogen deposition on sensitive species.		the Board of Public Works. The required Tree Report shall include the location, size, type, and condition of all existing trees in the adjacent public right-of-way and shall be submitted for review and approval by the Urban Forestry Division of the Bureau of Street Services, Department of Public Works. Per Section 62.177 of the LAMC, the Applicant shall pay an in-lieu tree replacement fee for any trees removed in the public right-of-way that cannot be replaced on site. **RCM-BIO-2**: Proposed project activities (including disturbances to native and non-native vegetation, structures and substrates) should take place outside of the breeding bird season which generally runs from March 1- August 31 (as early as February 1 for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture of kill (Fish and Game Code Section 86). If project activities cannot feasibly avoid the breeding bird season, beginning thirty days prior to the disturbance of suitable nesting habitat, the applicant shall: • Arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within 300 feet of the construction work area (within 500 feet for raptors) as access to adjacent areas allows. The surveys shall be conducted by a Qualified Biologist with experience in conducting breeding bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than 3

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			days prior to the initiation of clearance/construction work. • If a protected native bird is found, the applicant shall delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species (within 500 feet for suitable raptor nesting habitat) until August 31. • Alternatively, the Qualified Biologist could continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest (within 500 feet for raptor nests) or as determined by an qualified biological monitor, shall be postponed until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. The buffer zone from the nest shall be established in the field with flagging and stakes. Construction personnel shall be instructed on the sensitivity of the area. • The Applicant shall record the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds. Such record shall be submitted and received into the case file for the associated discretionary action permitting the project.
Impact BIO-2: 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	**SCAG Mitigation Measures**: See SMM BIO-1 and SMM BIO-2.	SCAG	N/A
	Project Level Mitigation Measures: See PMM BIO-1. **PMM BIO-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse	Lead Agency	**This Mitigation Measure is not applicable to the project.** The project is located in a developed, urban area and would be replacing and existing vacant warehouse building. The project

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Department of Fish and Game or US Fish and Wildlife Service.	effects related to riparian habitats and other sensitive natural communities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Consult with the USFWS and NMFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal ESA. b) Consult with the USFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal ESA and any additional species afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-county area: Angeles, Cleveland, Los Padres, and San Bernardino. c) Consult with the CDFW where such state-designated sensitive or riparian habitats provide potential or occupied habitat for state-listed rare, threatened, and endangered species afforded protection pursuant to the California ESA, or Fully Protected Species afforded protection pursuant to the State Fish and Game Code. d) Consult with the CDFW pursuant to the provisions of Section 1600 of the State Fish and Game Code as they relate to Lakes and Streambeds. e) Consult with the USFWS, USFS, CDFW, and counties and cities in the SCAG region, where state- designated sensitive or riparian habitats are occupied by birds afforded protection pursuant to the MBTA during the breeding season. f) Consult with the CDFW for state-designated sensitive or riparian habitats where furbearing mammals, afforded protection pursuant to the provisions of the State Fish and Game Code for fur-beaming mammals, are actively using the areas in conjunction with breeding activities. g) Require project design to avoid sensitive natural communities and riparian habitats, wherever practicable and feasible. Where practicable and feasible, require upland buffers that sufficiently minimize impacts to riparian corridors. h) Where avoidance is determined to be infeasible, develop sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) to protect sensitive natural communities and riparian habitats and develop appropriate compensatory mitigation, where required. i) Appoint a qualified wetland biologist to monitor construction activities that may occur in or adjacent to sensitive communities.		would not be developed on existing open space. Therefore, development of the project would not result in adverse effects to any riparian habitat or other sensitive habitat that supports any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

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	j) Appoint a qualified wetland biologist to monitor implementation of mitigation measures. k) Schedule construction activities to avoid sensitive times for biological resources and to avoid the rainy season when erosion and sediment transport is increased. l) When construction activities require stream crossings, schedule work during dry conditions and use rubber-wheeled vehicles, when feasible. Have a qualified wetland scientist determine if potential project impacts require a Notification of Lake or Streambed Alteration to CDFW during the planning phase of projects. m) Consult with local agencies, jurisdictions, and landowners where such state-designated sensitive or riparian habitats are afforded protection pursuant an adopted regional conservation plan. n) Install fencing and/or mark sensitive habitat to be avoided during construction activities. o) Salvage and stockpile topsoil (the surface material from 6 to 12 inches deep) and perennial native plants, when recommended by the qualified wetland biologist, for use in restoring native vegetation to areas of temporary disturbance within the project area. Salvage of soils containing invasive species, seeds and/or rhizomes will be avoided as identified by the qualified wetland biologist. p) Revegetate with appropriate native vegetation following the completion of construction activities, as identified by the qualified wetland biologist. q) Complete habitat enhancement (e.g., through removal of non-native invasive wetland species and replacement with more ecologically valuable native species). r) Use Best Management Practices (BMPs) at construction sites to minimize erosion and sediment transport from the area. BMPs include encouraging growth of native vegetation in disturbed areas, using straw bales or other silt-catching devices, and using settling basins to minimize soil transport.		
Impact BIO-3: 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.	**SCAG Mitigation Measures:** See SMM BIO-1 and SMM BIO-2.	SCAG	N/A
	Project Level Mitigation Measures: See PMM BIO-1 and PMM BIO-2. **PMM BIO-3:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wetlands, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency.	Lead Agency	**This Mitigation Measure is not applicable to the project.** The project site is a fully developed urban infill site that is not located on protected wetlands.

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	a) Require project design to avoid federally protected aquatic resources consistent with the provisions of Sections 404 and 401 of the CWA, wherever practicable and feasible. b) Where the lead agency has identified that a project, or other regionally significant project, has the potential to impact other wetlands or waters, such as those considered Waters Of the State of California under the State Wetland Definition and Procedures for Dischargers of Dredged or Fill Material to Waters of the State, not protected under Section 404 or 401 of the CWA, seek comparable coverage for these wetlands and waters in consultation with the SWRCB, applicable RWQCB, and CDFW. c) Where avoidance is determined to be infeasible, develop sufficient conservation measures to fulfill the requirements of the applicable authorization for impacts to federal and state protected aquatic resource to support issuance of a permit under Section 404 of the CWA as administered by the USACE. The use of an authorized Nationwide Permit or issuance of an individual permit requires the project applicant to demonstrate compliance with the USACE's Final Compensatory Mitigation Rule. The USACE reviews projects to ensure environmental impacts to aquatic resources are avoided or minimized as much as possible. Consistent with the administration's performance standard of "no net loss of wetlands" a USACE permit may require a project proponent to restore, establish, enhance or preserve other aquatic resources in order to replace those affected by the proposed project. This compensatory mitigation process seeks to replace the loss of existing aquatic resource functions and area. Project proponents required to complete mitigation are encouraged to use a watershed approach and watershed planning information. The new rule establishes performance standards, sets timeframes for decision making, and to the extent possible, establishes equivalent requirements and standards for the three sources of compensatory mitigation: • Permittee-responsible mitigation • Contribution of in-kind in-lieu fees • Use of in-kind mitigation bank credits • Where avoidance is determined to be infeasible and d) Where avoidance is determined to be infeasible and proposed projects' impacts exceed an existing Nationwide Permit (NWP) and/or California SWRCB-certified NWP, or applicable County Special Area Management Plan (SAMP), the lead agency should provide USACE and SWRCB (where applicable) an alternative analysis consistent with the Least Environmentally Damaging Practicable Alternatives in this order of priorities: • Avoidance • Impact Minimization		

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	• On-site alternatives • Off-site alternatives e) Require review of construction drawings by a certified wetland delineator as part of each project-specific environmental analysis to determine whether aquatic resources will be affected and, if necessary, perform formal wetland delineation.		
Impact BIO-4: 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.	**SCAG Mitigation Measures:** See SMM BIO-1 and SMM BIO-2, SMM AG-1 through SMM AG-4, SMM GHG-1, SMM WF-1. **SMM BIO-3**: SCAG shall coordinate with Caltrans and facilitate research, programs and policies to identify, protect and restore natural habitat corridors, especially where corridors cross county boundaries. Additionally, continue support for preserving wildlife corridors and wildlife crossings to minimize the impact of transportation projects on wildlife species and habitat fragmentation. SCAG shall disseminate key information related to the preservation and implementation of wildlife corridors and crossings by showcasing best practices at SCAG's Natural Lands Working Groups. SCAG shall also distribute wildlife corridors and crossings data to local jurisdictions, so they may incorporate said data into their general plans, as applicable.	SCAG	N/A
	Project Level Mitigation Measures: See PMM BIO-1 through PMM BIO-3. **PMM BIO-4:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wildlife movement, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Consult with the USFS where impacts to migratory wildlife corridors may occur in an area afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-County area: Angeles, Cleveland, Los Padres, and San Bernardino. b) Consult with counties, cities, and other local organizations when impacts may occur to open space areas that have been designated as important for wildlife movement related to local ordinances or conservation plans. c) Prohibit construction activities within 500 feet of occupied breeding areas for wildlife afforded protection pursuant to Title 14 § 460 of the California Code of Regulations protecting fur-bearing mammals, during the breeding season. d) Conduct a survey to identify active raptor and other migratory nongame bird nests by a qualified biologist at least two weeks before the start of construction at project sites from February 1 through August 31.	Lead Agency	**This Mitigation Measure is incorporated through compliance with regulatory compliance measures.** The project site is currently developed and located in a highly urbanized area in the City. No wildlife corridors or native wildlife nursery sites are present on the project site or in the surrounding area. Furthermore, due to the urbanized nature of the project site area, the potential for native resident or migratory wildlife species movement through the site is negligible. Nonetheless, the project site does include non-native trees that could support raptor and/or songbird nests. While the project would remove one of the three street trees along South Hill Street, two new street trees would be planted resulting in a total of seven street trees along the project site. In addition, these two trees would be part of 120 new trees provided on the project site, such that the project would provide greater habitat area for birds.

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	e) Prohibit construction activities with 300 feet of occupied nest of birds afforded protection pursuant to the Migratory Bird Treaty Act, during the breeding season. f) Ensure that suitable nesting sites for migratory nongame native bird species protected under the Migratory Bird Treaty Act and/or trees with unoccupied raptor nests should only be removed prior to February 1, or following the nesting season. g) When feasible and practicable, proposed projects will be designed to minimize impacts to wildlife movement and habitat connectivity and preserve existing and functional wildlife corridors. h) Conduct site-specific analyses of opportunities to preserve or improve habitat linkages with areas on- and off-site. i) Long linear projects with the possibility of impacting wildlife movement should analyze habitat linkages/wildlife movement corridors on a broad scale to avoid critical narrow choke points that could reduce function of recognized movement corridor. j) Require review of construction drawings and habitat connectivity mapping by a qualified biologist to determine the risk of habitat fragmentation. k) Pursue mitigation banking to preserve habitat linkages and corridors (opportunities to purchase, maintain, and/or restore offsite habitat). l) When practicable and feasible design projects to promote wildlife corridor redundancy by including multiple connections between habitat patches. m) Evaluate the potential for installation of overpasses, underpasses, and culverts to create wildlife crossings in cases where a roadway or other transportation project may interrupt the flow of species through their habitat. Retrofitting of existing infrastructure in project areas should also be considered for wildlife crossings for purposes of mitigation. n) Install wildlife fencing where appropriate to minimize the probability of wildlife injury due to direct interaction between wildlife and roads or construction. o) Where avoidance is determined to be infeasible, design sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) and in accordance with the respective counties and cities general plans to establish plans to mitigate for the loss of fish and wildlife movement corridors and/or wildlife nursery sites. The consideration of conservation measures may include the following measures, in addition to the measures outlined in MM-BIO-1(b), where applicable: • Wildlife movement buffer zones		As a standard practice, the Department of Building and Safety requires regulatory compliance measure RCM-BIO-2, which would avoid any potential impacts related to native birds during construction activities. Operation of the proposed project would introduce a new 40-story mixed-use building on the project site. The new building has the potential to misdirect or confuse migratory birds, resulting in disruption of natural behavioral patterns and possible injury or death from exhaustion or collisions with buildings. The project includes design features that minimize large, uninterrupted reflective surfaces, including the uses of vertical and horizontal mullions in a timber-like tone, a series of balconies along the spine of the building, and integration of cascading vegetation on the lower level floors and roof that serve to break up the surface of the building. The project also includes four distinctive circular crown rooftop elements. To minimize the potential for lighting to contribute to bird strikes, the building will use outdoor lighting that would be designed to reduce night-time attraction of birds and thus strike potential. All Federal Aviation Administration lighting would comply with obstruction and marking guidelines by ensuring that required obstruction lighting is comprised of only L-864 strobe lights with appropriate flash rates and extinguish all steady burning L-810 lights. As such, operational impacts of the project would be less than significant.

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	• Corridor realignment • Appropriately spaced breaks in center barriers • Stream rerouting • Culverts • Creation of artificial movement corridors such as freeway under- or overpasses • Other comparable measures p) Where the lead agency has identified that a RTP/SCS project, or other regionally significant project, has the potential to impact other open space or nursery site areas, seek comparable coverage for these areas in consultation with the USFWS, CDFW, NMFS, or other local jurisdictions. q) Incorporate applicable and appropriate guidance (e.g. FHWA-HEP-16-059), as well as best management practices, to benefit pollinators with a focus on native plants. r) Implement berms and sound/sight barriers at all wildlife crossings to encourage wildlife to utilize crossings. Sound and lighting should also be minimized in developed areas, particularly those that are adjacent to or go through natural habitats. s) Reduce lighting impacts on sensitive species through implementation of mitigation measures such as, but not limited to: • Use high pressure sodium and/or cut-off fixtures instead of typical mercury-vapor fixtures for outdoor lighting. • Design exterior lighting to confine illumination to the project site • Provide structural and/or vegetative screening from light-sensitive uses. • Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces. • Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties. t) Reduce noise impacts to sensitive species through implementation of mitigation measures such as, but not limited to: • Install temporary noise barriers during construction. • Include permanent noise barriers and sound-attenuating features as part of the project design. Barriers could be in the form of outdoor barriers, sound walls, buildings, or earth berms to attenuate noise at adjacent sensitive uses. • Ensure that construction equipment are properly maintained per manufacturers' specifications and fitted with the best available noise		

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	suppression devices (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded. • Use hydraulically or electrically powered tools (e.g., jack hammers, pavement breakers, and rock drills) for project construction to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust should be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves should be used, if such jackets are commercially available, and this could achieve a further reduction of 5 dBA. Quieter procedures should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures. • Using rubberized asphalt or "quiet pavement" to reduce road noise for new roadway segments, roadways in which widening or other modifications require re-pavement, or normal reconstruction of roadways where re-pavement is planned • Use equipment and trucks with the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds, wherever feasible) for project construction. • Use techniques such as grade separation, buffer zones, landscaped berms, dense plantings, sound walls, reduced-noise paving materials, and traffic calming measures. u) Require large buffers between sensitive uses and freeways. v) Create corridor redundancy to help retain functional connectivity and resilience.		
Impact BIO-5: Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	**SCAG Mitigation Measures:** See SMM BIO-1, SMM BIO-2 and SMM BIO-3.	SCAG	N/A
	Project Level Mitigation Measures: See PMM BIO-1 through PMM BIO-4. **PMM BIO-5:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce conflicts with local policies and ordinances protecting biological resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Consult with the appropriate local agency responsible for the administration of the policy or ordinance protecting biological resources. b) Prioritize retention of trees on-site consistent with local regulations. Provide adequate protection during the construction period for any trees that are to	Lead Agency	**This Mitigation Measure is incorporated through compliance with regulatory compliance measures.** There are no native tree species within the project site that would be subject to the protection of Ordinance No. 177404 of the LAMC (Section 1, Subdivision 12, of Subsection A of Section 12.21, as amended). However, there are six existing non-native, non-protected street trees; one of which would be removed as part of the project but

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	remain standing, as recommended by an International Society of Arboriculture (ISA) certified arborist. c) If specific project area trees are designated as "Protected Trees," "Landmark Trees," or "Heritage Trees," obtain approval for encroachment or removals through the appropriate entity, and develop appropriate mitigation measures at that time, to ensure that the trees are replaced. Mitigation trees shall be locally collected native species, as directed by a qualified biologist. d) Appoint an ISA certified arborist to monitor construction activities that may occur in areas with trees are designated as "Protected Trees," "Landmark Trees," or "Heritage Trees," to facilitate avoidance of resources not permitted for impact. Before the start of any clearing, excavation, construction or other work on the site, securely fence off every protected tree deemed to be potentially endangered by said site work. Keep such fences in place for duration of all such work. Clearly mark all trees to be removed. e) Establish a scheme for the removal and disposal of logs, brush, earth and other debris that will avoid injury to any protected tree. Where proposed development or other site work could encroach upon the protected perimeter of any protected tree, incorporate special measures to allow the roots to breathe and obtain water and nutrients. Minimize any excavation, cutting, filing, or compaction of the existing ground surface within the protected perimeter. Require that no change in existing ground level occur from the base of any protected tree at any time. Require that no burning or use of equipment with an open flame occur near or within the protected perimeter of any protected tree. f) Require that no storage or dumping of oil, gas, chemicals, or other substances that may be harmful to trees occur from the base of any protected trees, or any other location on the site from which such substances might enter the protected perimeter. Require that no heavy construction equipment or construction materials be operated or stored within a distance from the base of any protected trees. Require that wires, ropes, or other devices not be attached to any protected tree, except as needed for support of the tree. Require that no sign, other than a tag showing the botanical classification, be attached to any protected tree. g) Thoroughly spray the leaves of protected trees with water periodically during construction to prevent buildup of dust and other pollution that would inhibit leaf transpiration, as directed by the certified arborist. h) If any damage to a protected tree should occur during or as a result of work on the site, the appropriate local agency will be immediately notified of such damage. If, such tree cannot be preserved in a healthy state, as determined by the certified arborist, require replacement of any tree removed with another tree or trees on the same site deemed adequate by the local agency to compensate for the loss of the tree that is removed. Remove all debris created as a result of any tree removal work from the property within two weeks of debris creation, and such debris shall be properly disposed of in accordance		would be replaced by two new street trees, for a total of seven street trees along the perimeter of the project site. In addition, these two trees would be part of 120 new trees provided on the project site. As discussed above, the removal and placement of street trees would be subject to the review and approval of the Board of Public Works, Urban Forestry Division. Prior to the issuance of any permit, a plot plan shall be prepared indicating the location, size, type, and general condition of all existing trees on the site and within the adjacent public right(s)-of-way (RCM-BIO-1) and per Section 62.177 of the LAMC, the Applicant shall pay an in-lieu tree replacement fee for any trees removed in the public right-of-way that cannot be replaced on site. The project would be required to comply with the Federal Migratory Bird Treaty Act and Sections 3503, 3503.5, and 3513 of the California Fish and Game Code, which prohibits take of all birds and their active nests including raptors and other migratory nongame birds (RCM-BIO-2).

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	with all applicable laws, ordinances, and regulations. Design projects to avoid conflicts with local policies and ordinances protecting biological resources i) Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the applicable policy or ordinance shall be developed, such as to support issuance of a tree removal permit. The consideration of conservation measures may include: • Avoidance strategies • Contribution of in-lieu fees • Planting of replacement trees • Re-landscaping areas with native vegetation post-construction • Other comparable measures developed in consultation with local agency and certified arborist.		
Impact BIO-6: Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.	**SCAG Mitigation Measures:** SMM BIO-1, SMM BIO-2 and SMM BIO-3.	SCAG	
	Project Level Mitigation Measures: See PMM BIO-1 through PMM BIO-5. **PMM BIO-6:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on HCPs and NCCPs, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Consult with the appropriate federal, state, and/or local agency responsible for the administration of HCPs or NCCPs. b) Wherever practicable and feasible, the project shall be designed to avoid lands preserved under the conditions of an HCP or NCCP. c) Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the HCP and/or NCCP, which would include but not be limited to applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal Endangered Species Act or Section 2081 of the California ESA, shall be developed to support issuance of an incidental take permit or any other permissions required for development within the HCP/NCCP boundaries. The consideration of additional conservation measures would include the measures outlined in SMM-BIO-2, where applicable.	Lead Agency	**This Mitigation Measure is incorporated through compliance with regulatory compliance measures.** There are no native tree species within the project site that would be subject to the protection of Ordinance No. 177404 of the LAMC (Section 1, Subdivision 12, of Subsection A of Section 12.21, as amended). However, there are six existing non-native, non-protected street trees; one of which would be removed as part of the project but would be replaced by two new street trees, for a total of seven street trees along the perimeter of the project site. In addition, these two trees would be part of 120 new trees provided on the project site. As discussed above, the removal and placement of street trees would be subject to the review and approval of the Board of Public Works, Urban Forestry Division. Prior to the issuance of any permit, a plot plan shall be prepared indicating the location, size, type, and general condition of all

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			existing trees on the site and within the adjacent public right(s)-of-way (RCM-BIO-1) and per Section 62.177 of the LAMC, the Applicant shall pay an in-lieu tree replacement fee for any trees removed in the public right-of-way that cannot be replaced on site. The project would be required to comply with the Federal Migratory Bird Treaty Act and Sections 3503, 3503.5, and 3513 of the California Fish and Game Code, which prohibits take of all birds and their active nests including raptors and other migratory nongame birds (RCM-BIO-2).
Cultural Resources			
Impact CULT-1: Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5.	**SCAG Mitigation Measure** **SMM CULT-1:** Impacts to cultural resources shall be minimized through cooperation, information sharing, and SCAG's ongoing regional planning efforts such as web-based planning tools for local governments including CA LOTS, and other GIS tools and data services, including, but not limiting to, Map Gallery, GIS library, and GIS applications (note that no confidential cultural or tribal cultural resource location information will be housed in this database. All regulations pertaining to cultural resources site location confidentiality will be respected); and direct technical assistance efforts such as Toolbox Tuesday series and sharing of associated online Training materials. SCAG shall consult with resource agencies such as the National Park Service, Office of Historic Preservation, and Native American Heritage Commission, and with Native American tribes, to identify opportunities for early and effective consultation to identify archaeological sites, historical resources, and cemeteries to avoid such resources wherever practicable and feasible and reduce or mitigate for conflicts in compatible land use to the maximum extent practicable.	SCAG	N/A
	Project Level Mitigation Measures **PMM CULT-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Pursuant to CEQA Guidelines Section 15064.5, conduct a record search during the project planning phase at the appropriate Information Center to determine whether the project area has been previously surveyed and whether historical resources were identified.	Lead Agency	**This Mitigation Measure is incorporated through compliance with regulatory compliance measures.** Pursuant to CEQA Guidelines Section 15064.5, a Historic Resources Assessment (HRA) Report was prepared for the project, which satisfies the requirements set forth in PMM CULT-1 to identify if previously evaluated or previously unknown historical resources are present.

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	b) During the project planning phase, retain a qualified architectural historian, defined as an individual who meets the Secretary of the Interior's (SOI) Professional Qualification Standards (PQS) in Architectural History, to conduct historic architectural surveys if a built environment resource greater than 45 years in age may be affected by the project or if recommended by the Information Center. c) Comply with Section 106 of the National Historic Preservation Act (NHPA) including, but not limited to, projects for which federal funding or approval is required for the individual project. This law requires federal agencies to evaluate the impact of their actions on resources included in or eligible for listing in the National Register. Federal agencies must coordinate with the State Historic Preservation Officer in evaluating impacts and developing mitigation. These mitigation measures may include, but are not limited to the following: • Employ design measures to avoid historical resources and undertake adaptive reuse where appropriate and feasible. If resources are to be preserved, as feasible, carry out the maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction in a manner consistent with the Secretary of the Interior's Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. If resources would be impacted, impacts should be minimized to the extent feasible. • Where feasible, noise buffers/walls and/or visual buffers/landscaping should be constructed to preserve the contextual setting of significant built resources. d) If a project requires the relocation, rehabilitation, or alteration of an eligible historical resource, the Secretary of the Interior's Standards for the Treatment of Historic Properties should be used to the maximum extent possible to ensure the historical significance of the resource is not impaired. The application of the standards should be overseen by an architectural historian or historic architect meeting the SOI PQS. Prior to any construction activities that may affect the historical resource, a report, meeting industry standards, should identify and specify the treatment of character-defining features and construction activities and be provided to the Lead Agency for review and approval. e) If a project would result in the demolition or significant alteration of a historical resource eligible for or listed in the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), or local register, recordation should take the form of Historic American Buildings Survey (HABS), Historic American Engineering Record (HAER), or Historic American Landscape Survey (HALS) documentation, and should be performed by an architectural historian or historian who meets the SOI PQS. Recordation should meet the SOI Standards and Guidelines for Architectural and Engineering, which defines the products acceptable for inclusion in the		As analyzed in the *1111 South Hill Street Historical Resources Technical Report*, prepared by GPA Consulting, in May 2020 *(*revised June 2021*)*, the building on the project site is not currently listed as a historical landmark under national, state, or local programs and is not included as historically significant in any historic resource surveys of the area. Using the established criteria and aspects of integrity, the building does not appear to meet the eligibility standards for any themes developed in the Los Angeles' Citywide Historic Context Statement (LACHCS) due to a lack of historic significance, architectural character, and physical integrity. Therefore, the building on the project site is not considered a historic resource and no historical resources would be demolished, destroyed, relocated, or altered as a result of the project. As such, there would be no direct impact on historical resources. Although there are no historical resources located on the project site, there are three designated historical resources and four potential historical resources in the study area. The four potential historical resources were all identified as eligible for listing through SurveyLA evaluation as part of the Central City Community Plan area survey completed in 2016. Because the project site is located outside the parcel boundaries of the seven historical resources in the study area, the project would not impact their integrity of immediate setting. Six historical resources would not be affected by the new building, due to the significant physical and visual separation between these historical resources and the project site. One

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	HABS/HAER/HALS collection at the Library of Congress. The specific scope and details of documentation should be developed at the project level in coordination with the Lead Agency. f) During the project planning phase, obtain a qualified archaeologist, defined as one who meets the SOI PQS for archaeology, to conduct a record search at the appropriate Information Center of the California Historical Resources Information System (CHRIS) to determine whether the project area has been previously surveyed and whether resources were identified. g) Contact the NAHC to request a Sacred Lands File search and a list of relevant Native American contacts who may have additional information. h) During the project planning phase, obtain a qualified archaeologist or architectural historian (depending on applicability) to conduct archaeological and/or historic architectural surveys as recommended by the qualified professional, the Lead Agency, or the Information Center. In the event the qualified professional or Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for archaeological resources. Survey shall be conducted where the records indicate that no previous survey has been conducted, or if survey has not been conducted within the past 10 years. If tribal resources are identified during tribal outreach, consultation, or the record search, a Native American representative traditionally affiliated with the project area, as identified by the NAHC, shall be given the opportunity to provide a representative or monitor to assist with archaeological surveys. i) If potentially significant archaeological resources are identified through survey, and impacts to these resources cannot be avoided, a Phase II Testing and Evaluation investigation should be performed by a qualified archaeologist prior to any construction-related ground-disturbing activities to determine significance. If resources determined significant or unique through Phase II testing, and avoidance is not possible, appropriate resource-specific mitigation measures should be established by the lead agency, in consultation with consulting tribes, where appropriate, and undertaken by qualified personnel. These might include a Phase III data recovery program implemented by a qualified archaeologist and performed in accordance with the OHP's Archaeological Resource Management Reports (ARMR): Recommended Contents and Format and Guidelines for Archaeological Research Designs. Additional options can include 1) interpretative signage, or 2) educational outreach that helps inform the public of the past activities that occurred in this area. Should the project require extended Phase I testing, Phase II evaluation, or Phase III data recovery, a Native American representative traditionally affiliated with the project area, as indicated by the NAHC, shall be given the opportunity to provide a representative or monitor to assist with the archaeological assessments. The long-term disposition of archaeological materials collected from a significant resource should be determined in consultation with the affiliated tribe(s), where relevant; this could include		historical resource, the Hill Grill is located at the northwest corner of 11th and Hill streets, directly across 11th Street north of the project site. As discussed in the in the *1111 South Hill Street Historical Resources Technical Report*, the project would introduce a new building substantially taller than the current building on the project site to the setting of the Hill Grill; however, the height of the new building would not diminish the integrity of the Hill Grill to a degree that it would no longer retain integrity as a whole. The project's proposed change to the setting, along with changes proposed by nearby related projects' heights and mass, would not impact an essential aspect of integrity for the Hill Grill to convey its historical significance. As such, the changes to the setting of the Hill Grill would not cause an indirect impact to the setting of the historical resource. While the project would introduce a new visual element to the area surrounding the seven historical resources in the study area, the overall integrity of setting has already been diminished by changes to the built environment over time. As such, the project's indirect impact would be less than significant. A *Cultural and Paleontological Resources Assessment Report* contained in Appendix C, was prepared by ICF for the project site. As described in the *Cultural and Paleontological Resources Assessment Report*. the project would not be expected to result in a significant impact on archaeological and tribal cultural resources related to a substantial adverse change in the significance of a prehistoric archaeological resource. There are no known previously recorded archaeological resources or

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	curation with a recognized scientific or educational repository, transfer to the tribe, or respectful reinternment in an area designated by the tribe. j) In cases where the project area is developed and no natural ground surface is exposed, sensitivity for subsurface resources should be assessed based on review of literature, geology, site development history, and consultation with tribal parties. If this archaeological desktop assessment indicates that the project is located in an area sensitive for archaeological resources, as determined by the Lead Agency in consultation with a qualified archaeologist, the project should retain an archaeological monitor and, in the case of sensitivity for tribal resources, a tribal monitor, to observe ground disturbing operations, including but not limited to grading, excavation, trenching, or removal of existing features of the subject property. The archaeological monitor should be supervised by an archaeologist meeting the SOI PQS k) Conduct construction activities and excavation to avoid cultural resources (if identified). If avoidance is not feasible, further work may be needed to determine the importance of a resource. Retain a qualified archaeologist, and/or as appropriate, a qualified architectural historian who should make recommendations regarding the work necessary to assess significance. If the cultural resource is determined to be significant under state or federal guidelines, impacts to the cultural resource will need to be mitigated. l) Stop construction activities and excavation in the area where cultural resources are found until a qualified archaeologist can determine whether these resources are significant, and tribal consultation can be conducted, in the case of tribal resources. If the archaeologist determines that the discovery is significant, its long-term disposition should be determined in consultation with the affiliated tribe(s); this could include curation with a recognized scientific or educational repository, transfer to the tribe, or respectful reinternment in an area designated by the tribe.		tribal cultural resources within the proposed project area. A NAHC Sacred Lands File search was conducted for the project and no resources were identified. Although a branch of the zanja system flowed in the vicinity of the project area the project is expected to have no direct impact on this cultural resource, as this section of the zanja was an open ditch that was abandoned before the urbanization of the South Park neighborhood. Any surviving elements of this resource would have been spatially constrained to the width of the ditch itself (outside the project side), and it would have been lost during the development of the neighborhood. Therefore, the project is not expected to cause a substantial adverse change in the significance of an archaeological resource. Per PRC Section 21083.2(f), a lead agency may make provisions for archaeological sites accidently discovered during construction. The project Applicant would be required to comply with the City's standard condition of approval related to inadvertent discovery of unknown archaeological resources (RCM-CR-1**)**. **RCM-CR-1**. In the event that cultural resources (sites, features, artifacts, or fossilized material) are exposed during construction activities for the project, all construction work occurring in the vicinity of the find shall immediately stop until a qualified specialist, meeting the Secretary of the Interior's Professional Qualification Standards, can evaluate the significance of the find and determine whether additional study is warranted. Depending upon the significance and nature of the find

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			under CEQA (14 CCR 15064.5(f); PRC Section 21082), the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan, testing or data recovery may be warranted.
Impact CULT-2: Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5.	**SCAG Mitigation Measure:** See SMM CULT-1.	SCAG	N/A
	Project Level Mitigation Measures: See PMM CULT-1.	Lead Agency	As described above, the project would comply with SCAG PMM CULT-1 as provided above. The project's impact would be less than significant with the implementation of regulatory compliance measures.
Impact CULT-3: Disturb human remains, including those interred outside of dedicated cemeteries.	**SCAG Mitigation Measure:** See SMM CULT-1.	SCAG	N/A
	Project Level Mitigation Measures **PMM CULT-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to human remains, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) In the event of discovery or recognition of any human remains during construction or excavation activities associated with the project, in any location other than a dedicated cemetery, cease further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the coroner of the county in which the remains are discovered has been informed and has determined that no investigation of the cause of death is required. b) If any discovered remains are of Native American origin, as determined by the county Coroner, an experienced osteologist, or another qualified professional: • Contact the County Coroner to contact the NAHC to designate a Native American Most Likely Descendant (MLD). The MLD should make a recommendation to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods. This may include obtaining a qualified archaeologist or team of archaeologists to properly excavate the human remains. In some cases, it is necessary for the Lead Agency, qualified archaeologist, or developer to also reach out to	Lead Agency	**This Mitigation Measure is incorporated through compliance with regulatory compliance measures.** The project site is developed with vacant warehouse building. Although the project site has been subject to grading and development in the past, the project would require excavations at a depth of approximately 45 feet below ground surface (bgs). As a result, construction may disturb human remains, including those interred outside of dedicated cemeteries. If human remains are exposed during construction, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the county coroner has made the necessary findings as to origin and disposition, pursuant to PRC Section 5097.98. If the county coroner concludes that the remains are of Native American descent, NAHC must be notified within 24 hours, and NAHC guidelines would be adhered to in the treatment and handling of the remains

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	the NAHC to coordinate and ensure notification in the event the Coroner is not available. • If the NAHC is unable to identify a MLD, or the MLD fails to make a recommendation within 48 hours after being notified by the commission, or the landowner or his representative rejects the recommendation of the MLD and the mediation by the NAHC fails to provide measures acceptable to the landowner, obtain a culturally affiliated Native American monitor, and an archaeologist, if recommended by the Native American monitor, and rebury the Native American human remains and any associated grave goods, with appropriate dignity, on the property and in a location that is not subject to further subsurface disturbance.		(RCM-CR-2). With regulatory compliance, the project's potential impacts would be less than significant. **RCM-CR-2.** If human remains are encountered unexpectedly during construction demolition and/or grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code (PRC) Section 5097.98. In the event that human remains are discovered during excavation activities, the following procedure shall be observed: • Stop immediately and contact the County Coroner: 1104 N. Mission Road Los Angeles, CA 90033 (323) 343-0512 (8 a.m. to 5 p.m. Monday through Friday) or (323) 343-0714 (After Hours, Saturday, Sunday, and Holidays) • If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC). • The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American. • The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods. • If the owner does not accept the descendant's recommendations

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Energy			
Impact ENR-1: Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.	No mitigation is required.	NA	No mitigation is required.
Impact ENR-2: Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.	No mitigation is required.	NA	No mitigation is required.
Geology and Soils			
Impact GEO-1: 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; (ii) strong seismic ground shaking; (iii) seismic-related ground failure, including liquefaction; (iv) landslides.	No mitigation is required.	NA	No mitigation is required.
Impact GEO-2: Result in substantial soil erosion or the loss of topsoil	**SCAG Mitigation Measure** **SMM-GEO-1:** SCAG shall facilitate the minimization of substantial soil erosion or loss of topsoil through cooperation, information sharing, and regional program development as part of SCAG's ongoing regional planning efforts. Such efforts shall include web-based planning tools for local government including CA LOTS, and other GIS tools and data services, including, but not limited to, Map Gallery, GIS library, and GIS applications, and direct technical assistance efforts such as training series and sharing of associated online training materials. Resource agencies, such as the U.S. Geology Survey, shall be consulted during this update process. **SMM GEO-2:** Impacts to paleontological resources shall be minimized through cooperation, information sharing, and SCAG's ongoing regional planning	SCAG	N/A

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	efforts such as web-based planning tools for local governments including CA LOTS, and other GIS tools and data services, including, but not limiting to, Map Gallery, GIS library, and GIS applications; and direct technical assistance efforts such as training series and sharing of associated online training materials. SCAG shall consult with resource agencies such as the National Park Service, United States Forest Service, and Bureau of Land Management to identify opportunities for early and effective consultation to identify unique paleontological resources and unique geological features to avoid such resources wherever practicable and feasible and reduce or mitigation for conflicts in compatible land use to the maximum extent practicable.		
	Project Mitigation Measures **PMM-GEO-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that site-specific geotechnical investigations conducted by a qualified geotechnical expert are conducted to ascertain soil types prior to preparation of project designs. These investigations can and should identify areas of potential failure and recommend remedial geotechnical measures to eliminate any problems. b) Consistent with the requirements of the State Water Resources Control Board (SWRCB) for projects over one acre in size, obtain coverage under the General Construction Activity Storm Water Permit (General Construction Permit) issued by the SWRCB and prepare a stormwater pollution prevention plan (SWPPP) and submit the plan for review and approval by the Regional Water Quality Control Board (RWQCB). At a minimum, the SWPPP should include a description of construction materials, practices, and equipment storage and maintenance; a list of pollutants likely to contact stormwater; site-specific erosion and sedimentation control practices; a list of provisions to eliminate or reduce discharge of materials to stormwater; best management practices (BMPs); and an inspection and monitoring program. c) Consistent with the requirements of the SWRCB and local regulatory agencies with oversight of development associated with the Plan, ensure that project designs provide adequate slope drainage and appropriate landscaping to minimize the occurrence of slope instability and erosion. Design features should include measures to reduce erosion caused by storm water. Road cuts should be designed to maximize the potential for revegetation. d) Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that, prior to preparing project	Lead Agency	**This Mitigation Measure is incorporated through compliance with regulatory compliance measures. and incorporation of PDF GEO-1.** A Geotechnical and Soils report was prepared for the project site, entitled *Preliminary Site Geotechnical and Geologic Assessment Report for Proposed 40-Story Hi-Rise Mixed-Use Development Project 1101-1115 S. Hill Street and 206-210 W. 11th Street, Los Angeles, California* (Geotechnical Investigation), August 16, 2021, prepared by AECOM. The Geotechnical Investigation identified areas of potential geotechnical, soil, or seismic hazards and recommended remedial design and structural measures to minimize any hazards. As identified in the Geotechnical Investigation, the project site is not located within an Alquist-Priolo Earthquake Fault Zone as defined by the State of California. Impacts related to seismic hazards, liquefaction, lateral spreading, subsidence and other geological hazards would be less than significant. As identified in the Geotechnical Investigation, based on the results of corrosion tests the top 5 feet of surface soils and the soil at 20 to 25 feet bgs are moderately corrosive to corrosive to

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	designs, new and abandoned wells are identified within construction areas to ensure the stability of nearby soils.		ferrous metals, and sulfate attack to exposed concrete is considered moderate corrosive to negligible. Further, the project is subject to the following regulatory compliance measures, which are capable of avoiding or reducing the significant effects on the potential for projects to result in substantial soil erosion or the loss of topsoil, that are in the jurisdiction and responsibility of public agencies, regulatory agencies, and/or Lead Agencies. **RCM GEO-1**: A final, design level, geotechnical, geologic and seismic hazard investigation report that complies with all applicable state and local code requirements shall be prepared by a California-registered geotechnical engineer and shall be submitted to the LADBS. The final geotechnical, geologic and seismic hazard investigation report would specify exact design coefficients, as well as the type and sizing of structural building materials, site preparation requirements, and foundation design requirements; and demonstrate that construction procedures would meet the established performance standards. The site-specific geotechnical report shall be prepared to the written satisfaction of LADBS and shall address each of the recommendations identified in the Preliminary Site Geotechnical and Geologic Assessment Report for Proposed 43-Story Hi-Rise Mixed-Use Development Project 1101-1115 S. Hill Street and 206-210 W. 11th Street, Los Angeles, California, prepared by AECOM, dated April 15, 2020. **RCM GEO-2:** Seismic Ground Shaking: The proposed tower would be designed

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			using the Los Angeles Tall Buildings Structural Design Council 2001 edition, "An Alternative Procedure for Seismic Analysis and Design of Tall Buildings Located in the Los Angeles Region." With this design approach, a site-specific ground motion based on the latest seismic design standard would be developed for the project's structural design. In addition, PDF GEO-1 would be implemented to further reduce any potential hazards: **PDF GEO-1:** Corrosive Soils: The project shall provide corrosion protection for metals in areas where corrosive groundwater or soil could potentially cause deterioration. Corrosion protection techniques could include epoxy and metallic protective coatings, the use of alternative (corrosion resistant) materials, and selection of the appropriate type of cement and water/cement ratio. The reinforced concrete mix design would be performed following the latest Building Code regulations. Specific measures to reduce the potential effects would be developed in the design phase to reduce the impact related to corrosive soils to low levels and would be approved by the Los Angeles Department of Building and Safety. In addition, the project would be required to comply with the existing seismic design provisions and regulations associated with the City of Los Angeles Building Code, which incorporates the 2016 Uniform Building Code (UBC) and 2016 California Building Code (CBC). The 2016 edition of the CBC is based on the 2015 International Building Code (IBC) published by the International Code

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			Council, which replaced the Uniform Building Code. The 2016 CBC contains California amendments based on the American Society of Civil Engineers (ASCE) Minimum Design Standard ASCE/SEI 7-16, Minimum Design Loads for Buildings and Other Structures, provides requirements for general structural design and includes means for determining earthquake loads as well as other loads (such as wind loads) for inclusion into building codes. During construction of the project, the project would be required to implement Best Management Practices (BMPs) as required in the project's Stormwater Pollution Prevention Plan (SWPPP) following the latest guidelines of the California Stormwater Quality Association (CASQA) handbook as part of the City's grading permit requirements. BMPs would include, but would not necessarily be limited to, erosion control, sediment control, non-stormwater management, and materials management BMPs (e.g., sandbags, storm drain inlets protection, stabilized construction entrance/exit, wind erosion control, and stockpile management) to minimize the discharge of pollutants in stormwater runoff during construction. In addition, project construction activities would occur in accordance with City grading permit regulations (LAMC Chapter IX, Division 70), such as the preparation of an Erosion Control Plan, to reduce the effects of sediment and erosion.
Impact GEO-3: 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,	No mitigation is required.		No mitigation is required.

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subsidence, liquefaction, or collapse.			
Impact GEO-4: Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.	No mitigation is required.		No mitigation is required.
Impact GEO-5: 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.	No mitigation is required.		No mitigation is required.
Impact GEO-6: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	**SCAG Mitigation Measure** **SMM-GEO-3:** Impacts to paleontological resources shall be minimized through cooperation, information sharing, and SCAG's ongoing regional planning efforts such as web-based planning tools for local governments including CA LOTS, and other GIS tools and data services, including, but not limiting to, Map Gallery, GIS library, and GIS applications; and direct technical assistance efforts such as training series and sharing of associated online training materials. SCAG shall consult with resource agencies such as the National Park Service, United States Forest Service, and Bureau of Land Management to identify opportunities for early and effective consultation to identify unique paleontological resources and unique geological features to avoid such resources wherever practicable and feasible and reduce or mitigation for conflicts in compatible land use to the maximum extent practicable.	SCAG	N/A
	Project Level Mitigation Measures **PMM GEO-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to paleontological resources. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Ensure compliance with the Paleontological Resources Preservation Act, the Federal Land Policy and Management Act, the Antiquities Act, Section 5097.5 of the Public Resources Code (PRC), adopted county and city general plans, and other federal, state and local regulations, as applicable and feasible, by adhering to and incorporating the performance standards and practices from the 2010 Society for Vertebrate Paleontology (SVP) standard procedures for the assessment and mitigation of adverse impacts to paleontological resources.	Lead Agency	**This Mitigation Measure is incorporated through implementation of a project-specific Mitigation Measure which is equal to or more effective than this Mitigation Measure.** A Cultural and Paleontological Resources Assessment Report was prepared for the project by ICF. The *Cultural and Paleontological Resources Assessment Report* included a review of the Geotechnical Report and a fossil localities search requested by ICF from the Natural History Museum of Los Angeles County (NHMLAC) for the project area. The NHMLAC responded on April 21, 2020,

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	b) Obtain review by a qualified paleontologist (e.g. who meets the SVP standards for a Principal Investigator or Project Paleontologist or the Bureau of Land Management (BLM) standards for a Principal Investigator), to determine if the project has the potential to require ground disturbance of parent material with potential to contain unique paleontological or resources, or to require the substantial alteration of a unique geologic feature. The assessment should include museum records searches, a review of geologic mapping and the scientific literature, geotechnical studies (if available), and potentially a pedestrian survey, if units with paleontological potential are present at the surface. c) Avoid exposure or displacement of parent material with potential to yield unique paleontological resources. d) Where avoidance of parent material with the potential to yield unique paleontological resources is not feasible: 1. All on-site construction personnel receive Worker Education and Awareness Program (WEAP) training prior to the commencement of excavation work to understand the regulatory framework that provides for protection of paleontological resources and become familiar with diagnostic characteristics of the materials with the potential to be encountered. 2. A qualified paleontologist prepares a Paleontological Resource Management Plan (PRMP) to guide the salvage, documentation and repository of unique paleontological resources encountered during construction. The PRMP should adhere to and incorporate the performance standards and practices from the 2010 SVP Standard procedures for the assessment and mitigation of adverse impacts to paleontological resources. If unique paleontological resources are encountered during construction, use a qualified paleontologist to oversee the implementation of the PRMP. 3. Monitor ground disturbing activities in parent material, with a moderate to high potential to yield unique paleontological resources using a qualified paleontological monitor meeting the standards of the SVP or the BLM to determine if unique paleontological resources are encountered during such activities, consistent with the specified or comparable protocols. 4. Identify where ground disturbance is proposed in a geologic unit having the potential for containing fossils and specify the need for a paleontological monitor to be present during ground disturbance in these areas. e) Avoid routes and project designs that would permanently alter unique geological features. f) Salvage and document adversely affected resources sufficient to support ongoing scientific research and education.		saying that it had no recorded fossil localities in the project footprint. While there are no recorded fossil localities on the project site, fossil specimens have been encountered in the immediate vicinity of the project. The NHMLAC advised that deeper excavations in the proposed project area that extend down into older Quaternary sediments may encounter significant vertebrate fossils. Therefore, the project would implement mitigation measure MM-GEO-1 which would reduce a potentially significant unforeseen impact to paleontological resources to a less than significant level. **MM-GEO-1:** Conduct Paleontological Resource Monitoring. A qualified paleontologist shall review the paleontological records search prepared by the Los Angeles County Natural History Museum and review existing literature for the proposed project area. The following additional measures shall be designed to recover remains before they are lost or destroyed. • All ground-disturbing activities associated with project construction occurring within previously undisturbed fossil bearing formations shall be monitored by a qualified paleontologist or qualified paleontological monitor. A qualified paleontologist is defined as an individual with an M.S. or Ph.D. in paleontology or geology who is familiar with paleontological procedures and techniques, who is knowledgeable in the geology and paleontology of Los Angeles County, and who has worked as a paleontological monitoring project

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	g) Significant recovered fossils should be prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility. h) Following the conclusion of the paleontological monitoring, the qualified paleontologist should prepare a report stating that the paleontological monitoring requirement has been fulfilled and summarize the results of any paleontological finds. The report should be submitted to the lead CEQA and the repository curating the collected artifacts, and should document the methods and results of all work completed under the PRMP, including treatment of paleontological materials, results of specimen processing, analysis, and research, and final curation arrangements.		supervisor in the County for at least 1 year. A paleontological monitor is defined as an individual who has experience in the collection and salvage of fossil materials, and works under the direction of a qualified paleontologist. • A qualified paleontologist shall attend preconstruction meetings to consult with the grading and excavation contractors concerning excavation schedules, paleontological field techniques, and safety issues. In addition, all on-site construction personnel will receive Worker Education and Awareness Program (WEAP) training prior to the commencement of excavation work. • If fossils are discovered, the paleontologist (or paleontological monitor) shall recover them. In most cases, this fossil salvage can be completed in a short period of time; however, some fossil specimens, such as a complete large mammal skeleton, may require an extended salvage period. In these instances, the paleontologist (or paleontological monitor) shall be allowed to temporarily direct, divert, or halt grading to allow recovery of fossil remains in a timely manner. Because of the potential for the recovering of small fossil remains, such as isolated mammal teeth, it may be necessary to set up a screen-washing operation on site. • Fossil remains collected during the monitoring and salvage portion of the program shall be cleaned, repaired, sorted, and catalogued. • Prepared fossils, along with copies of all pertinent field notes, photos,

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			and maps, shall be deposited (as a donation) in a scientific institution with permanent paleontological collections, such as the NHMLAC. • A final data recovery report shall be completed that outlines the results of the monitoring program. This report will include discussions of the methods used, stratigraphic section(s) exposed, fossils collected, and significance of recovered fossils. With implementation of MM GEO-1, the project impact to paleontological resources would be less than significant.
Greenhouse Gases			
Impact GHG-1: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	**SCAG Mitigation Measures** **SMM GHG-1:** SCAG, in partnership with local air districts, shall continue to work with the counties and cities to adopt qualified GHG reduction plans (e.g., climate action plans [CAPs], develop GHG-reducing planning policies, and implement local climate initiatives. These reductions can be achieved through a combination of programs that implement plans developed collaboratively, including ZNE in new construction, retrofits of existing buildings, incentivizing the development of renewable energy sources that serve both new and existing land uses, as well as measures to reduce GHG emissions form transportation sources. Additionally, SCAG shall continue to update the Green Region Initiative (GRI) Sustainability Indicators Mapping tool, which serves as an interactive information resource for jurisdictions within the SCAG region to measure and track sustainability progress in the region across 12 categories and 29 sustainability indicators. The tool fosters collaboration through the sharing of best practices across the 191 cities and six counties in the SCAG region, and identifies opportunities for improving sustainability practices (due to the recent inclusion of SB 535 Disadvantaged Communities data). **SMM GHG-2:** SCAG shall encourage energy efficient design for buildings, through SCAG's Sustainable Communities Program potentially including strengthening local building codes for new construction and renovation to achieve a higher level of energy efficiency. **SMM GHG-3:** SCAG shall continue supporting deployment of zero-emission (ZEV) vehicles and ZEV infrastructure in the region through its Clean Cities Program and Electric Vehicle (EV) Program. This will include working with	SCAG	N/A

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	partners such as universities, utilities, regulating agencies, the private sector, national laboratories and the US Department of Energy, NGO's, and member agencies to share information, resources, and data, to showcase best practices, and to provide support or teaming arrangements to help bring funding, projects, or other resources to the region. SCAG shall also support member agencies and other stakeholders in making decisions about and removing barriers to ZEV infrastructure. Potential deliverables include, but are not limited to: • EV Charging Station Studies • On-going webinars, meetings, outreach and GRI data to support AB1236 compliance and the forthcoming Hydrogen Permitting Guidebook. SCAG shall also create the framework for a program to identify funding and provide rebates and/or other funding for light duty ZEVs and supportive infrastructure **SMM GHG-4:** SCAG shall continue to pursue partnerships with SCE, municipal utilities, locally operated electricity providers and CPUC to promote energy efficient development in the SCAG region, through coordinated planning and data and information sharing activities.		
	Project Level Mitigation Measures **PMM-GHG-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to greenhouse gas emissions, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Integrate green building measures consistent with CALGreen (California Building Code Title 24), local building codes and other applicable laws, into project design including: • Use energy efficient materials in building design, construction, rehabilitation, and retrofit. • Install energy-efficient lighting, heating, and cooling systems (cogeneration); water heaters; appliances; equipment; and control systems. • Reduce lighting, heating, and cooling needs by taking advantage of light-colored roofs, trees for shade, and sunlight. • Incorporate passive environmental control systems that account for the characteristics of the natural environment. • Use high-efficiency lighting and cooking devices. • Incorporate passive solar design.	Lead Agency	**This Mitigation Measure is incorporated through compliance with regulatory compliance measures and incorporation of project design features.** **RCM-GHG-1.** The project must meet Title 24 2016 standards and include ENERGY STAR appliances. Energy Star-rated appliances would reduce the projects energy demand during the operational life of the multi-family dwelling units. **RCM-GHG-2**. The project is subject to construction and demolition waste recycling of at least 65 percent, per Section 4.408.1 of Title 24 Part 11, California Green Building Standards Code (CALGreen). In addition, project site operations are subject to AB 939 requirements to divert 50 percent of solid waste to landfills through source reduction, recycling, and composting. Finally, the project is required by the California Solid Waste Reuse and

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	• Use high-reflectivity building materials and multiple glazing. • Prohibit gas-powered landscape maintenance equipment. • Install electric vehicle charging stations. • Reduce wood burning stoves or fireplaces. • Provide bike lanes accessibility and parking at residential developments. b) Reduce emissions resulting from projects through implementation of project features, project design, or other measures, such as those described in Appendix F of the State CEQA Guidelines. c) Include off-site measures to mitigate a project's emissions. d) Measures that consider incorporation of Best Available Control Technology (BACT) during design, construction and operation of projects to minimize GHG emissions, including but not limited to: • Use energy and fuel-efficient vehicles and equipment; • Deployment of zero- and/or near zero emission technologies; • Use lighting systems that are energy efficient, such as LED technology; • Use the minimum feasible amount of GHG-emitting construction materials; • Use cement blended with the maximum feasible amount of flash or other materials that reduce GHG emissions from cement production; • Incorporate design measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse; • Incorporate design measures to reduce energy consumption and increase use of renewable energy; • Incorporate design measures to reduce water consumption; • Use lighter-colored pavement where feasible; • Recycle construction debris to maximum extent feasible; • Plant shade trees in or near construction projects where feasible; and • Solicit bids that include concepts listed above. e) Measures that encourage transit use, carpooling, bike-share and car-share programs, active transportation, and parking strategies, including, but not limited to the following: • Promote transit-active transportation coordinated strategies; • Increase bicycle carrying capacity on transit and rail vehicles; • Improve or increase access to transit;		Recycling Access Act of 1991 to provide adequate storage areas for collection and storage of recyclable waste materials. **RCM-GHG-3**. As mandated by the LA Green Building Code, the project is required to provide a schedule of plumbing fixtures and fixture fittings that reduce potable water use within the development by at least 20 percent. It must also provide irrigation design and controllers that are weather- or soil moisture-based and automatically adjust in response to weather conditions and plants' needs. **RCM-GHG-4** The project must comply with the electric vehicle ready and electric vehicle charging requirements set forth in Ordinance No. 186,485. **RCM-GHG-5**. Greenhouse Gas Emissions (Green Building Code): In accordance with the City of Los Angeles Green Building Code (Chapter IX, Article 9, of the Los Angeles Municipal Code), the project shall comply with all applicable mandatory provisions of the Los Angeles Green Code and as it may be subsequently amended or modified. **RCM-GHG-6**. The project shall comply with City Ordinance No. 184,248 (effective June 2016) amended provisions of Articles 4 and 9 of Chapter IX of the LAMC which establish citywide water efficiency standards and require water-saving systems and technologies in buildings and landscapes to conserve and reduce water usage. Furthermore, the project would result in a net increase of 119 trees at the project site over existing conditions along with other native and drought-tolerant vegetation. By locating its

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	• Increase access to common goods and services, such as groceries, schools, and day care; • Incorporate affordable housing into the project; • Incorporate the neighborhood electric vehicle network; • Orient the project toward transit, bicycle and pedestrian facilities; • Improve pedestrian or bicycle networks, or transit service; • Provide traffic calming measures; • Provide bicycle parking; • Limit or eliminate park supply through: i) Elimination (or reduction) of minimum parking requirements, ii) Creation of maximum parking requirements, iii) Provision of shared parking; • Unbundle parking costs; • Provide parking cash-out programs; • Implement or provide access to commute reduction program; f) Incorporate bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; and planning for and building local bicycle projects that connect with the regional network; g) Improving transit access to rail and bus routes by incentives for construction of transit facilities within developments, and/or providing dedicated shuttle service to transit stations; and h) Adopting employer trip reduction measures to reduce employee trips such as vanpool and carpool programs, providing end-of-trip facilities, and telecommuting programs including but not limited to measures that: • Provide car-sharing, bike sharing, and ride-sharing programs; • Provide transit passes; • Shift single occupancy vehicle trips to carpooling or vanpooling, for example providing ride-matching services; • Provide incentives or subsidies that increase that use of modes other than single-occupancy vehicle; • Provide on-site amenities at places of work, such as priority parking for carpools and vanpools, secure bike parking, and showers and locker rooms; • Provide employee transportation coordinators at employment sites; • Provide a guaranteed ride home service to users of non-auto modes.		mixed-use residential, restaurant, and retail commercial development on a project site that is located within a HQTA and TPA near frequent bus and rail lines, the project would reduce VMT and reduce GHG emissions by encouraging the use of transit, walking, and bicycling as compared to similar stand-alone residential uses that are not located in close proximity to transit. In addition, the following GHG emissions-reducing PDF would be incorporated into the project: **PDF-GHG-1:** No more than 50 percent of the residential units shall have an indoor fireplace installed. This measure would reduce the consumption of natural gas and associated GHG emissions. The project site is an urban, infill location close to jobs, off-site housing, and services and in close proximity to existing and future public transit stops, which would result in reduced VMT, as compared to a project of similar size and land uses at a location without close and walkable access to off-site destinations and public transit stops. The project includes ample bicycle parking spaces for the residential, TORS, and commercial uses of the project. Furthermore, the project would include pedestrian-friendly landscaping and design, new perimeter street trees, streetscape improvements, and street level commercial uses that would enliven the pedestrian experience. The project would support many of the recommended approaches within the SCAG Environmental Justice Toolbox. The project would include

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	i) Designate a percentage of parking spaces for ride-sharing vehicles or high-occupancy vehicles, and provide adequate passenger loading and unloading for those vehicles; j) Land use siting and design measures that reduce GHG emissions, including: • Developing on infill and brownfields sites; • Building compact and mixed-use developments near transit; • Retaining on-site mature trees and vegetation, and planting new canopy trees; • Measures that increase vehicle efficiency, encourage use of zero and low emissions vehicles, or reduce the carbon content of fuels, including constructing or encouraging construction of electric vehicle charging stations or neighborhood electric vehicle networks, or charging for electric bicycles; and • Measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling, composting, and reuse. k) Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities. The measures provided above are also intended to be applied in low income and minority communities as applicable and feasible. l) Require at least five percent of all vehicle parking spaces include electric vehicle charging stations, or at a minimum, require the appropriate infrastructure to facilitate sufficient electric charging for passenger vehicles and trucks to plug-in. m) Encourage telecommuting and alternative work schedules, such as: i) Staggered starting times ii) Flexible schedules iii) Compressed work weeks n) Implement commute trip reduction marketing, such as: i) New employee orientation of trip reduction and alternative mode options ii) Event promotions iii) Publications o) Implement preferential parking permit program p) Implement school pool and bus programs q) Price workplace parking, such as: i) Explicitly charging for parking for its employees; ii) Implementing above market rate pricing; iii) Validating parking only for invited guests; iv) Not providing employee parking and transportation allowances; and v) Educating employees about available alternatives		characteristics and design features that support reductions in air emissions and encouragement of alternative modes of transportation. The project would provide new residential uses and employment opportunities in proximity to job centers in Los Angeles where people can live and work and have access to convenient modes of transportation that provides options for reducing reliance on automobiles and minimizing associated air pollutant emissions. The project would include up to 319 new residential units in a mix of studio, one-bedroom, two-bedroom, three-bedroom, and penthouse units. While the units would be market-rate units, the mixture of different unit types at varied rates would provide variety for different income levels and household sizes.

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Impact GHG-2: Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	**SCAG Mitigation Measures**: See SMM GHG -1, SMM GHG-2, SMM GHG-3, and SMM GHG-4.	SCAG	N/A
	Project Level Mitigation Measures: See PMM-GHG-1.	Lead Agency	**This Mitigation Measure is incorporated through compliance with regulatory compliance measures and incorporation of project design features**. The project would be consistent with the goals of the 2017 Scoping Plan, SB 375, the 2020-2045 RTP/SCS, Los Angeles' Sustainable City pLAn and the Green Building Code. As a transit priority project under SB 375 that is located in a HQTA, the project locates a mixed-use development consisting of residential, TORS, and restaurant uses near multiple public transit options. The urban infill location of the project site is also surrounded by a diverse mixture of land uses including residential, office, commercial, industrial, and service uses. The diversity of land uses in proximity to the project site and the mix of uses associated with the project would reduce vehicle trips and VMT by encouraging walking and non-automotive forms of transportation, which would result in corresponding reductions in mobile GHG emissions. The project would be consistent with the Scoping Plan's overall goal of avoiding losses in carbon sequestration by planting a net increase of 119 trees at the project site over existing conditions along with other native and drought-tolerant vegetation.

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Hazards and Hazardous Materials			
Impact HAZ-1: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	**SCAG Mitigation Measures** **SMM HAZ-1:** SCAG shall work with the U.S. DOT, the Office of Environmental Service Caltrans, and the private sector to continue to conduct driver safety training programs and enforce speed limits on roadways. In an effort to reduce risks associated with the transport of hazardous materials in the SCAG region, SCAG shall encourage the U.S. Department of Transportation and the California Highway Patrol to continue to enforce speed limits and existing regulations governing goods movement and hazardous materials transportation. **SMM HAZ-2:** SCAG shall notify member agencies of the importance of ensuring that construction and operation of transportation projects provide for the safe transport and disposal of hazardous waste, consistent with the provisions of HMR, 49 CFR Parts 171–180. **SMM HAZ-3:** SCAG shall coordinate with the Office of Environmental Services to identify any transportation infrastructure elements within the SCAG region where risks to people and property occur at an above-average incident level, potentially warranting consideration for remedial design in future regional transportation plans (RTPs).	SCAG	N/A
	Project Level Mitigation Measures **PMM HAZ-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to the routine transport, use, or disposal of hazardous materials, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Where the construction or operation of projects involves the transport of hazardous material, provide a written plan of proposed routes of travel demonstrating use of roadways designated for the transport of such materials. b) Specify Project requirements for interim storage and disposal of hazardous materials during construction and operation. Storage and disposal strategies must be consistent with applicable federal, state, and local statutes and regulations. Specify the appropriate procedures for interim storage and disposal of hazardous materials, anticipated to be required in support of operations and maintenance activities, in conformance with applicable federal, state, and local statutes and regulations, in the business plan for projects as applicable and appropriate. c) Submit a Hazardous Materials Business/Operations Plan for review and approval by the appropriate local agency. Once approved, keep the plan on file with the Lead Agency (or other appropriate government agency) and update, as applicable. The purpose of the Hazardous Materials Business/Operations	Lead Agency	**This Mitigation Measure is not applicable to the project.** Typical of many construction projects, construction of the project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils. However, all materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions. Also, all construction work would be performed consistent with applicable federal Occupational Safety and Health Administration (OSHA) Safety and Health Standards and California Occupational Health and Safety Administration (Cal/OSHA) requirements to ensure the safety and well-being of construction workers.

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	Plan is to ensure that employees are adequately trained to handle the materials and provides information to the local fire protection agency should emergency response be required. The Hazardous Materials Business/Operations Plan should include the following: • The types of hazardous materials or chemicals stored and/or used on-site, such as petroleum fuel products, lubricants, solvents, and cleaning fluids. • The location of such hazardous materials. • An emergency response plan including employee training information. • A plan that describes the way these materials are handled, transported and disposed. d) Follow manufacturer's recommendations on use, storage, and disposal of chemical products used in construction. e) Avoid overtopping construction equipment fuel gas tanks. f) Properly contain and remove grease and oils during routine maintenance of construction equipment. g) Properly dispose of discarded containers of fuels and other chemicals. h) Prior to shipment remove the most volatile elements, including flammable natural gas liquids, as feasible. i) Identify and implement more stringent tank car safety standards. j) Improve rail transportation route analysis, and modification of routes based on that analysis. k) Use the best available inspection equipment and protocols and implement positive train control. l) Reduce train car speeds to 40 miles per hour when passing through urbanized areas of any size. m) Limit storage of crude oil tank cars in urbanized areas of any size and provide appropriate security in storage yards for all shipments. n) Notify in advance county and city emergency operations offices of all crude oil shipments, including a contact number that can provide real-time information in the event of an oil train derailment or accident. o) Report quarterly hazardous commodity flow information, including classification and characterization of materials being transported, to all first response agencies (49 Code Fed. Regs. 15.5) along the mainline rail routes used by trains carrying crude oil identified. p) Fund training and outfitting emergency response crews that includes the cost of backfilling personnel while in training.		Operation of the project's residential, TORS, and commercial uses would involve the use and storage of small quantities of potentially hazardous materials in the form of typical cleaning solvents, painting supplies, pesticides for landscaping, and pool maintenance. The use of these materials would be in small quantities and in accordance with the manufacturers' instructions for use, storage, and disposal of such products. Therefore, operation of the project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

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	q) Undertake annual emergency responses scenario/field based training including Emergency Operations Center Training activations with local emergency response agencies.		
Impact HAZ-2: 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.	**SCAG Mitigation Measures**: See SMM HAZ-1 through SMM HAZ-3.	SCAG	N/A
	Project Level Mitigation Measures: See PMM HAZ-1. **PMM HAZ-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce hazards related to the reasonably foreseeable upsets and accidents involving the release of hazardous materials, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: Require implementation of safety standards regarding transport of hazardous materials, including but not limited to the following: a) Removal of the most volatile elements, including flammable natural gas liquids, prior to shipment; b) More stringent tank car safety standards; c) Improved rail transportation route analysis, and modification of routes based on that analysis; d) Utilization of the best available inspection equipment and protocols, and implementation of positive train control; e) Reduced train car speeds to 40 miles per hour when passing through urbanized areas of any size; f) Limitations on storage of hazardous materials tank cars in urbanized areas of any size and provide appropriate security in storage yards for all shipments; g) Advance notification to county and city emergency operations offices of all crude oil and hazardous materials shipments, including a contact number that can provide real-time information in the event of an oil train derailment or accident; h) Quarterly hazardous commodity flow information, including classification and characterization of materials being transported, to all first response agencies (49 Code Fed. Regs. 15.5) along the mainline rail routes used by trains carrying hazardous materials.	Lead Agency	**This Mitigation Measure is incorporated through compliance with regulatory compliance measures.** **RCM -HAZ-1.** Prior to the issuance of any permit for the demolition or alteration of the existing structure(s), the applicant shall provide a letter to the Department of Building and Safety from a qualified asbestos abatement consultant indicating that no Asbestos-Containing Materials (ACM) are present in the building. If ACMs are found to be present, it shall be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other applicable State and Federal rules and regulations. **RCM-HAZ-2.** Prior to issuance of demolition permits, the Project Applicant shall submit verification to the City of Los Angeles Department of Building and Safety that a lead-based paint survey has been conducted at all existing buildings located on the Project site. If lead-based paint is found, the Project Applicant shall follow all procedural requirements and regulations for proper removal and disposal of the lead-based paint. **RCM HAZ-3**. Should any known, or previously undiscovered oil production wells be encountered at the project site during construction activities, the Applicant or construction manager shall halt work in the immediate area and notify DOGGR and the Los Angeles Fire Department immediately. Any

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			encountered wells shall be abandoned or re-abandoned in accordance with the requirements of DOGGR and the Los Angeles Fire Department. **RCM-HAZ**-4 The project shall provide a methane mitigation system as required by the Los Angeles Building Code Chapter 71, Methane Mitigation Standards Ordinance. Project construction would not involve the use of hazardous materials in substantial amounts such that a measurable risk to the public or the environment would result from construction activities. In addition, all construction work would be performed consistent with applicable federal OSHA Safety and Health Standards and Cal/OSHA requirements to ensure the safety and well-being of construction workers. Operation of the project would involve the use of only small quantities of hazardous materials typically used in residential, TORS units and commercial projects such as cleaning solvents, painting supplies, and pesticides for landscaping. However, such materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. As discussed above, no evidence of significant environmental concern was identified in connection with the project site that would create a significant hazard to the public or the environment through a reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

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Impact HAZ-3: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school	**SCAG Mitigation Measures**: See SMM HAZ-1 through SMM HAZ-3.	SCAG	N/A
	Project Level Mitigation Measures: See PMM HAZ-1 and PMM HAZ-2. **PMM HAZ-3:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to the release of hazardous materials within one-quarter mile of schools, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Where the construction and operation of projects involves the transport of hazardous materials, avoid transport of such materials within one-quarter mile of schools, when school is in session, wherever feasible. b) Where it is not feasible to avoid transport of hazardous materials, within one-quarter mile of schools on local streets, provide notifications of the anticipated schedule of transport of such materials.	Lead Agency	**As discussed above, this Mitigation Measure is incorporated through compliance with regulatory compliance measures.** Construction of the project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils typically used in construction. However, all such substances and materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions and are not expected to cause risk to the public or nearby schools. In addition, all construction work would be performed consistent with applicable federal OSHA Safety and Health Standards and Cal/OSHA requirements to ensure the safety and well-being of construction workers. The types of potentially hazardous substances and materials that would be used in association with the operation of the project would include those typical of residential, TORS, and commercial developments, such as small quantities of cleaning solvents, painting supplies, pesticides for landscaping, and pool maintenance. However, such substances and materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Therefore, construction and operation of the project would not create a significant risk of exposure to hazardous materials for the public or the environment, including schools.

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Impact HAZ-4: 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.	**SCAG Mitigation Measures**: See SMM HAZ-1 through SMM HAZ-3.	SCAG	N/A
	Project Level Mitigation Measures **PMM HAZ-4:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to projects that are located on a site which is included on the Cortese List, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) For any listed sites or sites that have the potential for residual hazardous materials as a result of historic land uses, complete a Phase I Environmental Site Assessment, including a review and consideration of data from all known databases of contaminated sites, during the process of planning, environmental clearance, and construction for projects. b) Where warranted due to the known presence of contaminated materials, submit to the appropriate agency responsible for hazardous materials/wastes oversight a Phase II Environmental Site Assessment report if warranted by a Phase I report for the project site. The reports should make recommendations for remedial action, if appropriate, and be signed by a Registered Environmental Assessor, Professional Geologist, or Professional Engineer. c) Implement the recommendations provided in the Phase II Environmental Site Assessment report, where such a report was determined to be necessary for the construction or operation of the project, for remedial action. d) Submit a copy of all applicable documentation required by local, state, and federal environmental regulatory agencies, including but not limited to: permit applications, Phase I and II Environmental Site Assessments, human health and ecological risk assessments, remedial action plans, risk management plans, soil management plans, and groundwater management plans. e) Conduct soil sampling and chemical analyses of samples, consistent with the protocols established by the U.S. EPA to determine the extent of potential contamination beneath all underground storage tanks (USTs), elevator shafts, clarifiers, and subsurface hydraulic lifts when on-site demolition or construction activities would potentially affect a particular development or building. f) Consult with the appropriate local, state, and federal environmental regulatory agencies to ensure sufficient minimization of risk to human health and environmental resources, both during and after construction, posed by soil contamination, groundwater contamination, or other surface hazards including, but not limited to, underground storage tanks, fuel distribution lines, waste pits and sumps. g) Obtain and submit written evidence of approval for any remedial action if required by a local, state, or federal environmental regulatory agency.	Lead Agency	**As discussed above, this Mitigation Measure is incorporated through compliance with regulatory compliance measures.** A Phase I Environmental Site Assessment (Phase I ESA) was prepared for the project site by PIC Environmental Services in February 19, 2019. The Phase I ESA was conducted to evaluate the presence of known or suspected hazardous materials or waste at the project site. A Phase II Site Assessment Geologic Report (Phase II) was prepared for the project site by PIC Environmental Services in March 31, 2019. The Phase I and Phase II were reviewed by PIC Environmental Services on July 6, 2021 and the findings and analysis of both reports remain valid for the project. The Phase I ESA prepared for the project, included a regulatory review of adjacent properties within a one-mile radius of the project site. The Phase I ESA indicated that no adjacent properties had known historic environmental concerns. As determined in the Phase I ESA, while the project site is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962, the project site would not create a significant hazard to the public or the environment caused in whole or in part from the project's exacerbation of existing environmental conditions. The project would not contain uses that would exacerbate existing environment conditions. According to the Phase I ESA, prepared due to the age of the on-site building, lead-based paint may be

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	h) Cease work if soil, groundwater, or other environmental medium with suspected contamination is encountered unexpectedly during construction activities (e.g., identified by odor or visual staining, or if any underground storage tanks, abandoned drums, or other hazardous materials or wastes are encountered), in the vicinity of the suspect material. Secure the area as necessary and take all appropriate measures to protect human health and the environment, including but not limited to, notification of regulatory agencies and identification of the nature and extent of contamination. Stop work in the areas affected until the measures have been implemented consistent with the guidance of the appropriate regulatory oversight authority. i) Soil generated by construction activities should be stockpiled on-site in a secure and safe manner. All contaminated soils determined to be hazardous or non-hazardous waste must be adequately profiled (sampled) prior to acceptable reuse or disposal at an appropriate off-site facility. Complete sampling and handling and transport procedures for reuse or disposal, in accordance with applicable local, state and federal laws and policies. j) Groundwater pumped from the subsurface should be contained on-site in a secure and safe manner, prior to treatment and disposal, to ensure environmental and health issues are resolved pursuant to applicable laws and policies. Utilize engineering controls, which include impermeable barriers to prohibit groundwater and vapor intrusion into the building. k) As needed and appropriate, prior to issuance of any demolition, grading, or building permit, submit for review and approval by the Lead Agency (or other appropriate government agency) written verification that the appropriate federal, state and/or local oversight authorities, including but not limited to the Regional Water Quality Control Board (RWQCB), have granted all required clearances and confirmed that the all applicable standards, regulations, and conditions have been met for previous contamination at the site. l) Develop, train, and implement appropriate worker awareness and protective measures to assure that worker and public exposure is minimized to an acceptable level and to prevent any further environmental contamination as a result of construction. m) If asbestos-containing materials (ACM) are found to be present in building materials to be removed, submit specifications signed by a certified asbestos consultant for the removal, encapsulation, or enclosure of the identified ACM in accordance with all applicable laws and regulations, including but not necessarily limited to: California Code of Regulations, Title 8; Business and Professions Code; Division 3; California Health and Safety Code Section 25915- 25919.7; and other local regulations. n) Where projects include the demolitions or modification of buildings constructed prior to 1978, complete an assessment for the potential presence		present on the project site. Should lead-based paint materials be identified, standard handling and disposal practices shall be implemented pursuant to CalOSHA regulations. Furthermore, the City of Los Angeles maintains specific code requirements when developments find lead-based paint. All construction activities would occur in adherence with these regulations guiding such activities to minimize any upset or accident release of hazardous materials into the environment. With regulatory compliance, the risk related to any existing LBPs at the project site would be reduced to acceptable levels, and the project would result in no impact with regard to LBPs and would not create a significant hazard to the public or the environment. As the onsite structure was built before the 1978 federal regulations banning the use of asbestos containing building materials (ACBMs) were enacted, there is a potential for the presence of ACBMs in the on-site building. The EPA's National Emission Standards for Hazardous Air Pollutants (NESHAP) requires that an asbestos survey adhering to Asbestos Hazard Emergency Response Act (AHERA) sampling protocol be performed prior to demolition or renovation activities that may disturb ACMs. This requirement may be enforced by the local air pollution control or air quality management district and specifies that all suspect asbestos-containing materials (ACMs) be sampled to determine the presence or absence of asbestos prior to any renovation or demolition activities to prevent potential exposure.

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	or lack thereof of ACM, lead based paint, and any other building materials or stored materials classified as hazardous waste by state or federal law. o) Where the remediation of lead-based paint has been determined to be required, provide specifications to the appropriate agency, signed by a certified Lead Supervisor, Project Monitor, or Project Designer for the stabilization and/or removal of the identified lead paint in accordance with all applicable laws and regulations, including but not necessarily limited to: California Occupational Safety and Health Administration's (Cal OSHA's) Construction Lead Standard, Title 8 California Code of Regulations (CCR) Section 1532.1 and Department of Health Services (DHS) Regulation 17 CCR Sections 35001–36100, as may be amended. If other materials classified as hazardous waste by state or federal law are present, the project sponsor should submit written confirmation to the appropriate local agency that all state and federal laws and regulations should be followed when profiling, handling, treating, transporting, and/or disposing of such materials.		Due to the historic laundry cleaning and newspaper printing uses on the project site, the Phase I ESA recommended as a precautionary measure, a subsurface soil investigation to be conducted as part of the Phase II investigation to determine the potential presence of PCBs and PCE on the project site. The results of the testing concluded that no detectable residual concentrations of PCE dry cleaning solvent were measured in any boring. In addition, all of the soil testing results indicated no detected levels for petroleum, VOCs (solvents), and polychlorinated biphenyls (PCB)s. No clean up action and review is required by the Regional Water Quality Control Board, DTSC or LA County Fire Department.
Impact HAZ-5: 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	**SCAG Mitigation Measures:** See SMM NOISE-1. **SMM HAZ-5:** SCAG shall continue to collaborate with key stakeholders on regional aviation planning issues through the Aviation Technical Advisory Committee (ATAC). The ATAC is a partnership between the airports, transportation agencies and commissions, experts, and other community members.	SCAG	N/A
	Project Level Mitigation Measures: See PMM NOISE-1.	Lead Agency	**This Mitigation Measure is not applicable to the project.** The project site is not in a designated Airport Hazard Zone. Furthermore, the project site is not located within an airport land use plan, within two miles of a public airport or public use airport, or within the vicinity of a private airstrip.
Impact HAZ-6: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan	**SCAG Mitigation Measures:** See SMM HAZ-1 through SMM HAZ-5 and SMM TRA-5.	SCAG	N/A
	Project Level Mitigation Measures: See PMM HAZ-1 through PMM HAZ-4 and PMM TRA-5. **PMM HAZ-5:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects which may impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, as	Lead Agency	**This Mitigation Measure is not applicable to the project**. No City-designated Disaster Routes border the project site; the closest such routes are Olympic Boulevard one block to the north and Broadway one block to the east. These routes would be close enough to the project site to potentially

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	applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Continue to coordinate locally and regionally based on ongoing review and integration of projected transportation and circulation conditions. b) Develop new methods of conveying projected and real time information to citizens using emerging electronic communication tools including social media and cellular networks; c) Continue to evaluate lifeline routes for movement of emergency supplies and evacuation.		be affected by backup congestion associated with the project's construction and operation. Development of the project site may require temporary and intermittent partial street closures due to construction activities. Nonetheless, while such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans. To minimize any construction impact on the surrounding street, bicycle, and pedestrian network, the project would implement a Construction Management Plan (PDF TRAF-1). The Construction Management Plan would include measures such as off-site truck staging; scheduling deliveries and pick-ups of construction materials during non-peak travel periods; a worksite traffic control plan; use of flag men to reroute traffic around any closures; establishment of requirements for loading/unloading and storage of materials to ensure that access would remain unobstructed for land uses in proximity to the project site; and coordination with the City and emergency service providers to ensure adequate access is maintained to the project site and adjacent uses. Future driveway and building configurations would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for patrons, employees, and residents. project site access and circulation plans would be subject to review and approval by LAFD and LAPD. In addition, MM-NOI-1 would require that prior to commencement of construction a designated project contact person will

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			directly notify the management of any surrounding residential properties located within 100 feet of the project site about the construction schedule and activities and provide a contact number to address any noise-related complaints during construction.
Impact HAZ-7: Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.	This impact is addressed under Section 3.20, Wildfire, Impact WF-2. See below.		**This Mitigation Measure is not applicable to the project.** The project site is currently developed and located in a highly urbanized area and does not contain wildland features. Therefore, development of the project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.
Hydrology and Water Quality			
Impact HYD-1: Potential to violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.	**SCAG Mitigation Measure** **SMM HYD-1:** SCAG shall continue to work with local jurisdictions and water quality agencies to encourage regional-scale planning for improved water quality management and pollution prevention. Future impacts to water quality shall be avoided to the extent practical and feasible through cooperative planning, information sharing, and comprehensive pollution control measure development within the SCAG region. This cooperative planning shall occur as part of current and existing coordination, an integral part of SCAG's ongoing regional planning efforts.	SCAG	N/A
	Project Level Mitigation Measures **PMM HYD-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects from violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Complete, and have approved, a Stormwater Pollution Prevention Plan (SWPPP) prior to initiation of construction. b) Implement Best Management Practices to reduce the peak stormwater runoff from the project site to the maximum extent practicable.	Lead Agency	**This Mitigation Measure is incorporated through compliance with regulatory compliance measures.** The project is subject to the following standard regulatory compliance measures, which are capable of avoiding or reducing the potential impacts on water quality on related waste discharge requirements that are within the jurisdiction and authority of the Regional Water Quality Control Boards and other regulatory agencies. **RCM-HYD-1** Prior to issuance of a grading permit, the Applicant shall obtain coverage under the State Water

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	c) Comply with the Caltrans storm water discharge permit as applicable; and identify and implement Best Management Practices to manage site erosion, wash water runoff, and spill control. d) Complete, and have approved, a Standard Urban Stormwater Management Plan, prior to occupancy of residential or commercial structures. e) Ensure adequate capacity of the surrounding stormwater system to support stormwater runoff from new or rehabilitated structures or buildings. f) Prior to construction within an area subject to Section 404 of the Clean Water Act, obtain all required permit approvals and certifications for construction within the vicinity of a watercourse: g) Where feasible, restore or expand riparian areas such that there is no net loss of impervious surface as a result of the project. h) Install structural water quality control features, such as drainage channels, detention basins, oil and grease traps, filter systems, and vegetated buffers to prevent pollution of adjacent water resources by polluted runoff where required by applicable urban storm water runoff discharge permits, on new facilities. i) Provide operational best management practices for street cleaning, litter control, and catch basin cleaning are implemented to prevent water quality degradation in compliance with applicable storm water runoff discharge permits; and ensure treatment controls are in place as early as possible, such as during the acquisition process for rights-of-way, not just later during the facilities design and construction phase. j) Comply with applicable municipal separate storm sewer system discharge permits as well as Caltrans' storm water discharge permit including long-term sediment control and drainage of roadway runoff. k) Incorporate as appropriate treatment and control features such as detention basins, infiltration strips, and porous paving, other features to control surface runoff and facilitate groundwater recharge into the design of new transportation projects early on in the process to ensure that adequate acreage and elevation contours are provided during the right-of-way acquisition process. l) Upgrade stormwater drainage facilities to accommodate any increased runoff volumes. These upgrades may include the construction of detention basins or structures that will delay peak flows and reduce flow velocities, including expansion and restoration of wetlands and riparian buffer areas. System designs shall be completed to eliminate increases in peak flow rates from current levels. j) Encourage Low Impact Development (LID) and incorporation of natural spaces that reduce, treat, infiltrate and manage stormwater runoff flows in all new developments, where practical and feasible.		Resources Control Board National Pollutant Discharge Elimination System General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, National Pollutant Discharge Elimination System No. CAS000002) (Construction General Permit) for the project, A Storm Water Pollution Prevention Plan shall be prepared and implemented for the project in compliance with the requirements of the Construction General Permit. The Storm Water Pollution Prevention Plan shall identify construction Best Management Practices to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities. **RCM-HYD-2.** Sediment carries with it other work-site pollutants such as pesticides, cleaning solvents, cement wash, asphalt, and car fluids that are toxic to sea life. • Leaks, drips and spills shall be cleaned up immediately to prevent contaminated soil on paved surfaces that can be washed away into the storm drains. • All vehicle/equipment maintenance, repair, and washing shall be conducted away from storm drains. All major repairs shall be conducted off-site. Drip pans or drop clothes shall be used to catch drips and spills. • Pavement shall not be hosed down at material spills. Dry cleanup methods shall be used whenever possible. Dumpsters shall be covered and maintained.

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			Uncovered dumpsters shall be placed under a roof or be covered with tarps or plastic sheeting. **RCM-HYD-3**. Prior to the issuance of a grading permit, the project shall comply with the SUSMP and/or the Site Specific Mitigation Plan to mitigate stormwater pollution as required by Ordinance Nos. 172,176 and 173,494. The appropriate design and application of BMP devices and facilities shall be determined by the Watershed Protection Division of the Bureau of Sanitation, Department of Public Works. **RCM-HYD-4**. Prior to issuance of grading permits, the Applicant shall submit a Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan to the City of Los Angeles Bureau of Sanitation Watershed Protection Division for review and approval. The Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook. **RCM-HYD-5**. The Best Management Practices shall be designed to retain or treat the runoff from a storm event producing 0.75 inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater, in accordance with the Development Best Management Practices Handbook Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect confirming that the proposed Best Management Practices meet this numerical threshold standard shall be provided.

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Impact HYD-2: Potential to substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.	**SCAG Mitigation Measure** **SMM HYD-2:** SCAG shall build from existing efforts including those at the sub-regional and local level and shall continue to work with local jurisdictions and water agencies, to encourage regional-scale planning for improved stormwater management and groundwater recharge, including consideration of alternative recharge technologies and practices. Future adverse impacts may be avoided through cooperative planning, information sharing, and comprehensive implementation efforts within the SCAG region.	SCAG	N/A
	Project Level Mitigation Measures **PMM HYD-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects from violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Avoid designs that require continual dewatering where feasible. For projects requiring continual dewatering facilities, implement monitoring systems and long-term administrative procedures to ensure proper water management that prevents degrading of surface water and minimizes adverse impacts on groundwater for the life of the project, Construction designs shall comply with appropriate building codes and standard practices including the Uniform Building Code. a) Maximize, where practical and feasible, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. Minimize new impervious surfaces, including the use of in-lieu fees and off-site mitigation. b) Avoid construction and siting on groundwater recharge areas, to prevent conversion of those areas to impervious surface. c) Reduce hardscape to the extent feasible to facilitate groundwater recharge as appropriate.	Lead Agency	**As discussed above, this Mitigation Measure is incorporated through compliance with regulatory compliance measures.**
Impact HYD-3a: 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 result in	**SCAG Mitigation Measures:** See SMM HYD-1 and SMM HYD-2. **SMM HYD-3:** SCAG shall build from existing efforts including those at the sub-regional and local level and shall continue to work with local jurisdictions to encourage regional-scale planning for maintaining and/or improving existing drainage patterns. Future adverse impacts may be avoided through cooperative planning, information sharing, and comprehensive implementation efforts within the SCAG region.	SCAG	N/A

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substantial erosion or siltation on- or off-site.	**Project Level Mitigation Measures:** See PMM HYD-1.	Lead Agency	**As discussed above, this Mitigation Measure is incorporated through compliance with regulatory compliance measures.**
Impact HYD-3b: 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 substantially increase the rate or amount of flooding on- or off-site.	**SCAG Mitigation Measures**: See SMM HYD-1 through SMM HYD-3.	SCAG	N/A
	Project Level Mitigation Measures: See PMM HYD-1 and PMM HYD-2.	Lead Agency	**As discussed above, this Mitigation Measure is incorporated through compliance with regulatory compliance measures.**
Impact HYD-3c: 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 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.	**SCAG Mitigation Measures**: See SMM HYD-1 through SMM HYD-3.	SCAG	N/A
	Project Level Mitigation Measures: See PMM HYD-1 and PMM HYD-2.	Lead Agency	**As discussed above, this Mitigation Measure is incorporated through compliance with regulatory compliance measures.** The project would include the installation of building roof drain downspouts, area drain, and planter drains to collect roof and site runoff. The project would also direct stormwater away from the building through a series of storm drainpipes. Furthermore, based on the volumetric flow rate analysis, a comparison of the pre- and post-project peak flow rate indicated that there would be a decrease in stormwater runoff. In addition, the implementation of BMPs required by the City's LID Ordinance would target runoff pollutants that could potentially be carried in stormwater runoff due to the collection of water to meet the regional LID guidelines. The project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems

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			or provide substantial additional sources of polluted runoff.
Impact HYD-4: In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.	**SCAG Mitigation Measures** **SMM HYD-4:** SCAG shall continue to work with local jurisdictions and water quality agencies to encourage flood protection and prevent development in flood hazard areas that do not have appropriate protections. This shall be accomplished through cooperation and information sharing regarding specific alignments and rights-of-way planning for RTP projects, and regional program development as part of SCAG's ongoing regional planning efforts. These include but are not limited to web-based data distribution planning tools and sustainability programs in conjunction with local governments. Such services would potentially consist of an inventory of areas located in or near a 100-year flood hazard zone or hazard areas that would potentially be affected by a failure of a levee or dam; or inundation by seiche, tsunami, or mudflow.	SCAG	N/A
	Project Level Mitigation Measures **PMM HYD-4:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures capable of avoiding or reducing the potential impacts of locating structures that would impede or redirect flood flows, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Ensure that all roadbeds for new highway and rail facilities be elevated at least one foot above the 100-year base flood elevation. Since alluvial fan flooding is not often identified on FEMA flood maps, the risk of alluvial fan flooding should be evaluated and projects should be sited to avoid alluvial fan flooding. Delineation of floodplains and alluvial fan boundaries should attempt to account for future hydrologic changes caused by global climate change.	Lead Agency	**This Mitigation Measure is not applicable to the project.** The project site is located inside the 500 Yr. Flood Zone, otherwise known as Zone X, in the Flood Insurance Rate Maps from the Federal Emergency Management Agency (FEMA). In addition to the low risk of flooding, the project would implement a capture and use and/or biofiltration system BMPs and a stormwater conveyance system. Thus, the project would not alter the existing drainage pattern of the project site in a manner that would impede or redirect flood flows. The project would not exacerbate potential dam failure or the possibility of flooding as a result of dam failure. The project is located too far away from the ocean and is at too high of an elevation for it to be affected by a tsunami. Seiches will not affect the project as it is not close enough to a large body of water to be affected. In addition to the low risk of flooding, the project includes capture and use and/or biofiltration system BMPs and a stormwater conveyance system, which would be an improvement compared to

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			the existing conditions on-site that are devoid of treatment and on-site detention. Therefore, the project would not risk release of pollutant due to inundation by flood hazards.
Impact HYD-5: Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.	**SCAG Mitigation Measure**: See SMM HYD-2.	SCAG	N/A
	Project Level Mitigation Measure: See PMM HYD-2.	Lead Agency	**As discussed above, this Mitigation Measure is incorporated through compliance with regulatory compliance measures.**
Land Use Planning			
Impact LU-1: Potential for the Plan to physically divide an established community	**SCAG Mitigation Measures** **SMM LU-1:** SCAG shall coordinate with local County Transportation Commissions, Caltrans and other implementing agencies when siting new facilities in residential areas to facilitate minimizing future impacts of transportation projects on established communities, through cooperation, information sharing, and regional program development as part of SCAG's ongoing regional planning efforts to promote best planning practices.	SCAG	N/A
	Project Level Mitigation Measures **PMM LU-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects that physically divide a community, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Facilitate good design for land use projects that build upon and improve existing circulation patterns b) Encourage implementing agencies to orient transportation projects to minimize impacts on existing communities by: • Selecting alignments within or adjacent to existing public rights of way. • Design sections above or below-grade to maintain viable vehicular, cycling, and pedestrian connections between portions of communities where existing connections are disrupted by the transportation project. • Wherever feasible incorporate direct crossings, overcrossings, or under crossings at regular intervals for multiple modes of travel (e.g., pedestrians, bicyclists, vehicles).	Lead Agency	**This Mitigation Measure is not applicable to the project.** The project site is currently developed with a warehouse that has been vacant since approximately 2013. The project site vicinity is highly urbanized and generally built out and is surrounded by various land uses, including residences, hotels, offices, restaurants, retail uses, parking structures, and surface parking lots. The project proposes to remove the existing warehouse and construct up to 319 multi-family residential units, up to 3,429 square feet of ground floor commercial uses, up to 160 TORS units, up to 436 vehicle parking spaces, and up to 347 bicycle spaces. As such, the project would be an infill project providing uses in keeping with the mixed-use character of the surrounding area. Given the type of uses in the project site vicinity, and the

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	c) Where it has been determined that it is infeasible to avoid creating a barrier in an established community, consider other measures to reduce impacts, including but not limited to: • Alignment shifts to minimize the area affected. • Reduction of the proposed right-of-way take to minimize the overall area of impact. d) Provisions for bicycle, pedestrian, and vehicle access across improved roadways.		infill character of the project, it would not physically divide an established community, nor would it disrupt or divide an established community through a change in street or land use patterns on surrounding streets. Thus, given the existing mix of uses in the project site vicinity and the location within an existing developed area, the project would not physically divide, disrupt, or isolate an established community.
Impact LU-2: 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	**SCAG Mitigation Measures** **SMM LU-2**: SCAG shall continue to promote the Intergovernmental Review (IGR) Program as an internal and external informational tool by reviewing and monitoring all projects submitted to SCAG for review and working with local jurisdictions to ensure that submitted projects support the most currently adopted Connect SoCal Plan. SCAG shall submit comment letters on regionally significant projects to provide policies and goals from Connect SoCal, recommend the application of project-level mitigation measures from the Connect SoCal PEIR and provide additional resources to help the lead agency support or develop a projects that are consistent with the Plan, as appropriate. The IGR Mapping Tool can also be utilized by local jurisdictions to assess regional impacts. To visit the IGR Mapping tool, please go to: https://maps.scag.ca.gov/IGR/. For more information on SCAG's IGR Program, please visit: http://www.scag.ca.gov/programs/Pages/IGR.aspx. **SMM LU-3:** SCAG shall encourage cities and counties in the region to provide SCAG with electronic versions of their most recent general plan (and associated environmental document) and any updates as they are produced. **SMM LU-4:** SCAG shall continue to provide targeted technical services such as GIS and data support for cities and counties to update their general plans at least every ten years, as recommended by the Governor's Office of Planning and Research. **SMM LU-5:** SCAG shall provide technical assistance and regional leadership to encourage implementation of the Plan goals and strategies that integrate growth and land use planning with the existing and planned transportation network.	SCAG	N/A
	Project Level Mitigation Measures **PMM LU-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects that physically divide a community, as applicable and feasible. Such	Lead Agency	**This Mitigation Measure is not applicable to the project.** The project would be substantially consistent with all applicable plans, policies and regulations adopted for the purpose of

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	measures may include the following or other comparable measures identified by the Lead Agency: a) When an inconsistency with the adopted general plan policy or land use regulation (adopted for the purpose of avoiding or mitigating an impact) is identified modify the transportation or land use project to eliminate the conflict; or, determine if the environmental, social, economic, and engineering benefits of the project warrant an amendment to the general plan or land use regulation.		avoiding or mitigating an environmental effect associated with development of the project site. More specifically, the project would be an urban infill project that would include a diversity of uses, including commercial, TORS units, and residential condominiums in close proximity to transit and in close proximity to a broad range of land uses within walking distance, which would stimulate non-vehicular modes of travel, including transit, pedestrian, and bicycle activity. As no housing currently exists on the project site, the project would provide a substantial increase in new housing units in the vicinity. Specifically, the project would provide up to 319 new residential units in a range of sizes and pricing. The location of the project adjacent to rail and bus service would increase housing opportunities for those wishing to reside near public transportation. The project would also provide new street-level landscaping and street trees and an overall increase in landscaping on the project site. The project would be consistent with the policies and objectives of the Los Angeles Framework Element, Los Angeles General Plan Housing Element, Los Angeles General Plan Mobility Plan 2035, Los Angeles General Plan Noise Element, Health and Wellness Element the SCAG's 2020-2045 RTP/SCS, the Central City Community Plan, the LAMC, the Downtown Design Guide, and the City Center Redevelopment Plan. Specifically, the project is consistent with goals and policies to contained within these plans that aim to provide new housing and employment opportunities, improve the pedestrian environment, support mixed use

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			development near transit, improve air quality and active transportation (e.g., bicycling and walking), and encourage new high quality development that is compatible with existing uses and development.
Mineral Resources			
Impact MIN-1: Potential to 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.	**SCAG Mitigation Measures** **SMM MIN-1:** SCAG shall coordinate with the Department of Conservation, California Geological Survey to maintain a database of (1) available mineral resources in the SCAG region including permitted and unpermitted aggregate resources and (2) the anticipated 50-year demand for aggregate and other mineral resources. Based on the results of this survey, SCAG shall work with local agencies on strategies to address anticipated demand, including identifying future sites that may seek permitting and working with industry experts to identify ways to encourage and increase recycling to reduce the demand for aggregate.	SCAG	N/A
	Project Level Mitigation Measures **PMM MIN-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce the use of mineral resources that could be of value to the region, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Provide for the efficient use of known aggregate and mineral resources or locally important mineral resource recovery sites, by ensuring that the consumptive use of aggregate resources is minimized and that access to recoverable sources of aggregate is not precluded, as a result of construction, operation and maintenance of projects. b) Where avoidance is infeasible, minimize impacts to the efficient and effective use of recoverable sources of aggregate through measures that have been identified in county and city general plans, or other comparable measures such as: 1. Recycle and reuse building materials resulting from demolition, particularly aggregate resources, to the maximum extent practicable. 2. Identify and use building materials, particularly aggregate materials, resulting from demolition at other construction sites in the SCAG region, or within a reasonable hauling distance of the project site. 3. Design transportation network improvements in a manner (such as buffer zones or the use of screening) that does not preclude adjacent or nearby	Lead Agency	**This Mitigation Measure is not applicable to the project.** No oil or gas wells are located on the project site or have been historically located on the project site, and as a mixed-use project, implementation of the project would not involve any oil, gas, or mineral extraction uses. As the project site does not have contain any known oil wells and the project site has not been used for mineral extraction and does not include any oil or mineral extraction uses, the project would not result in the loss of availability of known mineral resources.

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	extraction of known mineral and aggregate resources following completion of the improvement and during long-term operations. 4. Avoid or reduce impacts on known aggregate and mineral resources and mineral resource recovery sites through the evaluation and selection of project sites and design features (e.g., buffers) that minimize impacts on land suitable for aggregate and mineral resource extraction by maintaining portions of MRZ-2 areas in open space or other general plan land use categories and zoning that allow for mining of mineral resources.		
Impact MIN-2 Potential to 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.	**SCAG Mitigation Measure**: See SMM MIN-1.	SCAG	N/A
	Project Level Mitigation Measure: See PMM-MIN-1.	Lead Agency	**This Mitigation Measure is not applicable to the project.** The project site is within the Central City Community Plan and is designated as Regional Center Commercial, which corresponds to the property's current zoning of C2-4D-O (commercial, height district 4 with development limitation, oil drilling supplemental use district). Oil resource areas are designated as Oil Drilling Districts or State Designated Oil Fields, which often overlap. Generally, State Designated Oil Fields are broader than the drilling districts and follow specific streets and other geographic markers. As identified in the City of Los Angeles General Plan, Conservation Element, 2001, Appendix A, there are no mineral resources located on the project site but the project is located in an "Oil Drilling District" and on "State Designed Oil Fields." In addition, as shown in the Los Angeles General Plan Safety Element, Exhibit E, Oil Field and Oil Drilling Areas, and as identified in the Geotechnical Investigation, the project site is located within a Los Angeles City Oil Drilling District, the LA Downtown Oil Field. This denotes an area in which the drilling of oil wells or the production from the wells of oil, gases or other hydrocarbon substances is permitted. No oil or gas wells are located on the project site or have been historically

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			located on the project site, and as a mixed-use project, implementation of the project would not involve any oil, gas, or mineral extraction uses. Sand and gravel resources do not occur in the section of the Los Angeles basin occupied by the project site. (City of Los Angeles General Plan, Conservation Element, 2001). Because the project would not encroach on the City's existing sand and gravel mining operations or known sand and gravel resources, it would not result in the loss of availability of these locally important mineral resources.
Noise			
Impact NOISE-1: 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.	**SCAG Mitigation Measures** **SMM-NOISE-1:** SCAG shall coordinate with CTCs and member agencies as part of SCAG's outreach and technical assistance to local governments to encourage transportation projects and projects involving residential and commercial land uses to mitigate noise and vibration or be developed in areas that are normally acceptable or conditionally acceptable, consistent with applicable guidelines (i.e., OPR, Caltrans, etc.).	SCAG	N/A
	Project Level Mitigation Measures **PMM NOISE-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects that physically divide a community, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Install temporary noise barriers during construction. b) Include permanent noise barriers and sound-attenuating features as part of the project design. Barriers could be in the form of outdoor barriers, sound walls, buildings, or earth berms to attenuate noise at adjacent sensitive uses. c) Schedule construction activities consistent with the allowable hours pursuant to applicable general plan noise element or noise ordinance d) Post procedures and phone numbers at the construction site for notifying the Lead Agency staff, local Police Department, and construction contractor (during regular construction hours and off- hours), along with permitted	Lead Agency	**This Mitigation Measure is incorporated through project design features, compliance with regulatory compliance measures, and implementation of project-specific Mitigation Measures which are equal to or more effective than this Mitigation Measure.** The project is required to comply with the provisions in LAMC Section 41.40 and Section 112.05, which regulate noise from construction activities (e.g., construction activities will be prohibited between the hours of 9:00 p.m. and 7:00 a.m. on weekdays, and between 6:00 p.m. and 8:00 a.m. on any Saturday or national holiday or at any time on Sunday) and noise levels from equipment (e.g., noise level limit of 75 dBA at a distance of 50 feet for

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	construction days and hours, complaint procedures, and who to notify in the event of a problem. e) Notify neighbors and occupants within 300 feet of the project construction area at least 30 days in advance of anticipated times when noise levels are expected to exceed limits established in the noise element of the general plan or noise ordinance. f) Designate an on-site construction complaint and enforcement manager for the project. g) Ensure that construction equipment are properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded. h) Use hydraulically or electrically powered tools (e.g., jack hammers, pavement breakers, and rock drills) for project construction to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust should be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves should be used, if such jackets are commercially available, and this could achieve a further reduction of 5 dBA. Quieter procedures should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures. i) Where feasible, design projects so that they are depressed below the grade of the existing noise- sensitive receptor, creating an effective barrier between the roadway and sensitive receptors. j) Where feasible, improve the acoustical insulation of dwelling units where setbacks and sound barriers do not provide sufficient noise reduction. k) Using rubberized asphalt or "quiet pavement" to reduce road noise for new roadway segments, roadways in which widening or other modifications require re-pavement, or normal reconstruction of roadways where re-pavement is planned l) Projects that require pile driving or other construction noise above 90 dBA in proximity to sensitive receptors, should reduce potential pier drilling, pile driving and/or other extreme noise generating construction impacts greater than 90 dBA; a set of site-specific noise attenuation measures should be completed under the supervision of a qualified acoustical consultant. m) Use land use planning measures, such as zoning, restrictions on development, site design, and buffers to ensure that future development is compatible with adjacent transportation facilities and land uses;		powered equipment or tools unless technically infeasible); in City of Los Angeles Building Regulations Ordinance No. 178,048, which require a construction site notice to be provided; in LAMC Section 112.02, which require that any heating, ventilation, and air conditioning (HVAC) system within any zone of the City not cause an increase in ambient noise levels by more than 5 dBA on any other occupied property; and in LAMC Section 114.03, which prohibits loading/unloading activities within 200 feet of any residential building between the hours of 10:00 p.m. and 7:00 a.m. of the following day. The project's compliance with the provisions in LAMC Section 41.40 and Section 112.05 during construction would be consistent with PMM NOISE-1 measure c). In addition to the above regulatory compliance measures, in order to further minimize construction and operational noise, the project would include PDFs entailing the implementation of specific requirements and best management practices to minimize project-related noise. The incorporation of these PDFs by the project would be consistent with PMM NOISE-1 measure b). The PDFs are as follows: **PDF-NOI-1**. Each mechanical room shall be outfitted with sound attenuation measures to further minimize noise levels at neighboring properties in accordance with Section 112.02 of the LAMC, which prohibits noise from mechanical equipment from exceeding the ambient noise level on the premises of other occupied properties by more than 5 dBA.

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	n) Monitor the effectiveness of noise reduction measures by taking noise measurements and installing adaptive mitigation measures to achieve the standards for ambient noise levels established by the noise element of the general plan or noise ordinance. o) Use equipment and trucks with the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds, wherever feasible) for project construction. p) Stationary noise sources can and should be located as far from adjacent sensitive receptors as possible and they should be muffled and enclosed within temporary sheds, incorporate insulation barriers, or use other measures as determined by the Lead Agency (or other appropriate government agency) to provide equivalent noise reduction. q) Use of portable barriers in the vicinity of sensitive receptors during construction. r) Implement noise control at the receivers by temporarily improving the noise reduction capability of adjacent buildings (for instance by the use of sound blankets), and implement if such measures are feasible and would noticeably reduce noise impacts. s) Monitor the effectiveness of noise attenuation measures by taking noise measurements. t) Maximize the distance between noise-sensitive land uses and new roadway lanes, roadways, rail lines, transit centers, park-and-ride lots, and other new noise-generating facilities. u) Construct sound reducing barriers between noise sources and noise-sensitive land uses. v) Stationary noise sources can and should be located as far from adjacent sensitive receptors as possible and they should be muffled and enclosed within temporary sheds, incorporate insulation barriers, or use other measures as determined by the Lead Agency (or other appropriate government agency) to provide equivalent noise reduction. w) Use techniques such as grade separation, buffer zones, landscaped berms, dense plantings, sound walls, reduced-noise paving materials, and traffic calming measures. x) Locate transit-related passenger stations, central maintenance facilities, decentralized maintenance facilities, and electric substations away from sensitive receptors to the maximum extent feasible. y) Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities.		**PDF-NOI-2.** The mechanical room at the ground-floor level of the project building adjacent to the alleyway housing the emergency generators shall be designed with sufficient noise attenuation features (e.g., silencers, generator enclosures, insulation, etc.) to provide compliance with Section 112.02 of the LAMC, which prohibits noise from mechanical equipment from exceeding the ambient noise level on the premises of other occupied properties by more than 5 dBA. Furthermore, the project would implement the following mitigation measures to reduce construction noise to less-than-significant levels. The mitigation measures are as follows: **MM NOI-1.** The following measures shall be employed during project construction to reduce short-term noise levels at nearby noise-sensitive residential receptors: a) An 8-foot-high temporary barrier with a minimum sound transmission (STC) rating of 26, shall be erected along eastern and southern side of the project site boundary. The barrier will start at the northern extent of the construction site at the intersection of 11th Street and S. Hill Street and shall continue to the southern terminus of the construction site where it will turn perpendicular to the construction site and continue until the western terminus of the project site at the alley way west of the project site. This barrier shall be constructed in one of the following ways: o From acoustical blankets hung over or from a supporting frame. The blankets shall be

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			firmly secured to the framework. The blankets shall be overlapped by at least 4 inches at seams and taped and/or closed with hook-and-loop fasteners (i.e., Velcro®) so that no gaps exist. The largest blankets available shall be used in order to minimize the number of seams. The blankets shall be draped to the ground to eliminate any gaps at the base of the barrier. o From commercially available acoustical panels lined with sound-absorbing material (the sound-absorptive faces of the panels should face the construction equipment). o From common construction materials such as plywood provided that the barrier is designed with overlapping material at the seams to assure that no gaps exist between the panels. b) On-site vehicle speeds shall be limited to 15 miles per hour or less (except in cases of emergency). c) Construction-related truck traffic shall be routed away from noise-sensitive areas to the extent feasible. d) All construction equipment shall be properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds silencers, wraps). All intake and exhaust ports on power

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			equipment shall be muffled or shielded. e) Pneumatic tools used at the site shall be equipped with an exhaust muffler on the compressed air exhaust to minimize noise levels. f) Stationary noise sources shall be located as far from adjacent sensitive receptors as possible and shall be muffled and enclosed within temporary sheds or insulated barriers. g) Back-up beepers for all construction equipment and vehicles shall be broadband sound alarms or adjusted to the lowest noise levels possible, provided that Occupational Safety and Health Administration (OSHA) and California OSHA safety requirements are not violated. On vehicles where back-up beepers are not available, alternative safety measures such as escorts and spotters will be employed. h) A designated website shall be set up during project construction that provides the public with information about the project and its construction schedule as well as opportunities for the public to submit questions on the project. i) Prior to commencement of construction a designated project contact person shall directly notify the management of any surrounding residential properties located within 100 feet of the project site about the construction schedule and activities and provide a contact number to address any noise-related complaints during construction.

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			j) The construction management company's name and telephone number(s) shall be posted at a least one location along each street frontage that borders the project site. k) A designated point of contact shall be identified to address noise-related complaints during construction. The noise disturbance coordinator will be responsible for responding to any local complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., starting too early, bad muffler) and will be required to implement reasonable measures such that the complaint is resolved. **MM NOI-2.** A Board of Police Commissioners Permit in accordance with the provisions in LAMC Section 41.40 shall be obtained by the project construction contractor to allow for a continuous concrete pour at the project site during hours outside of the period between 7:00 a.m. and 9:00 p.m. The implementation of the measures listed under MM NOI-1 by the project would correlate and be consistent with PMM NOISE-1 measures a), d), e), f), g), h), p), q), r), u), and v). While PMM NOISE-1 measure e) recommends the notification of neighbors and occupants within 300 feet of the project construction area, MM NOI-1 only requires the notification of surrounding residential properties located within 100 feet of the project site about the construction schedule and activities because the project construction noise analysis demonstrated that an exceedance of City's 75 dBA noise limit for construction equipment would only occur at the nearest sensitive receptor

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			(i.e., Axis Apartments building) that is located approximately 85 feet from the project site. The next nearest sensitive receptor to the project site would be the future mixed-use DTLA South Park Project, which would have residential units located on floors 7-60 of the building. Based on the construction noise analysis conducted for the project, it was determined that the nearest residential units from this future neighboring use to the project site, which would be approximately 125 feet, would not be exposed to construction noise levels exceeding the City's 75 dBA limit for construction equipment. Thus, the notifying of surrounding residential properties located within 100 feet of the project site would be sufficient for the project. Furthermore, because the project would not require pile-driving or other high impact activities (e.g., blasting) during construction, PMM NOISE-1 measure l) would not be applicable. With respect to operational noise, because the project would not result in any potential noise impacts on nearby noise-sensitive receptors, no mitigation would need to be implemented during project operations. As such, PMM NOISE-1 measures j), m), n), r), and s) would not be applicable for the project. Furthermore, because the project is a mixed-use development project and is not a roadway or transportation-related facility project, PMM NOISE-1 measure i), k), t), w), x) and y) would not be applicable. The City has determined that, with compliance with City regulatory requirements, incorporation of PDF-NOI-1 and PDF-NOI-2, and implementation of mitigation measures MM-NOI-1 and MM-NOI-2, the project would minimize its construction and

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			operational noise effects. As a result, the City has determined that the project's noise impacts would be less than significant, and that the project would therefore minimize its effects substantially in conformance with SCAG PMM NOISE-1.
Impact NOISE-2: Generation of excessive groundborne vibration or groundborne noise levels.	**SCAG Mitigation Measure:** See SMM-NOISE-1	SCAG	N/A
	Project Level Mitigation Measures: See PMM-NOISE-1. **PMM NOISE-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to violating noise standards, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the potential vibration impacts to the structural integrity of the adjacent buildings within 50 feet of pile driving locations. b) For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the threshold levels of vibration and cracking that could damage adjacent historic or other structure, and design means and construction methods to not exceed the thresholds. c) For projects where pile driving would be necessary for construction due to geological conditions, utilize quiet pile driving techniques such as predrilling the piles to the maximum feasible depth, where feasible. Predrilling pile holes will reduce the number of blows required to completely seat the pile and will concentrate the pile driving activity closer to the ground where pile driving noise can be shielded more effectively by a noise barrier/curtain. d) Restrict construction activities to permitted hours in accordance with local jurisdiction regulation. e) Properly maintain construction equipment and outfit construction equipment with the best available noise suppression devices (e.g., mufflers, silences, wraps). f) Prohibit idling of construction equipment for extended periods of time in the vicinity of sensitive receptors.	Lead Agency	**This Mitigation Measure is incorporated through compliance with regulatory compliance measures and implementation of project-specific Mitigation Measures which are equal to or more effective than this Mitigation Measure**. Construction of the project would not require high-impact construction methods such as pile driving or blasting. As such, groundborne vibration during project construction would be generated from conventional heavy construction equipment, such as bulldozers and excavators. Even with the use of large, full-size mobile equipment at the project site, it was determined that the vibration levels generated during project construction would not exceed the applicable vibration criteria for building damage or human annoyance at the nearest surrounding existing and future off-site structures. As such, off-site receptors located in proximity to the project site would not be exposed to excessive groundborne vibration levels during project construction. Thus, no mitigation would need to be implemented regarding groundborne vibration during project construction. The project would implement MM NOI-1 to reduce construction noise to less-than-significant levels. In particular, measure d) under MM NOI-1 would require all construction equipment be properly maintained per manufacturers'

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			specifications and fitted with the best available noise suppression devices, which is in conformance to PMM NOISE-2 measure e). Furthermore, the project would comply existing regulatory compliance measures promulgated by CARB and the SCAQMD, including CARB's Anti-Idling Air Toxics Control Measure which does not allow diesel-fueled commercial vehicles to idle for more than 5 minutes at any given time, with certain exception for vehicles where idling is a necessary performance activity such as for concrete trucks. Thus the project would be in conformance with PMM NOISE-2 measure f).
Impact NOISE-3: 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.	**SCAG Mitigation Measures**: See SMM NOISE-1.	SCAG	N/A
	Project Level Mitigation Measures: See PMM NOISE-1.	Lead Agency	**This Mitigation Measure is not applicable to the project.** The project site is not in the vicinity of a private airstrip or airport land use plan or within two miles of a public airport of public use airport. Therefore, the project would not expose people residing or working in the project area to excessive noise levels generated from this airport, and no impact would occur.
Population and Housing			
Impact POP-1: Induce substantial unplanned population growth to areas of the region either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., by extending roads and other infrastructure)	**SCAG Mitigation Measures** **SMM-POP-1:** SCAG shall promote the Sustainability Program which will provide technical assistance to local jurisdictions that support local planning and implementation of the Connect SoCal Plan. The program recognizes sustainable solutions to local growth challenges and will result in local plans that promote sustainability through the integration of transportation and land use. For more information please visit: http://sustain.scag.ca.gov/Documents/Sustainable%20Communities%20Program%20Guidelines.pdf. **SMM-POP-2: SCAG shall provide technical assistance to local governments, transit agencies and** developers within the region to build housing capacity to compete in the statewide Affordable Housing Sustainable	SCAG	N/A

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	Communities (AHSC) grants program. The AHSC program is one of the few state funding opportunities to address housing shortages within the state. For more information please visit: http://ahsc.scag.ca.gov/Pages/Home.aspx. **SMM-POP-3:** SCAG shall host summits that addresses the housing crisis and provides solutions to build more housing. Examples include the 2016 Housing Summit (http://www.scag.ca.gov/SiteAssets/HousingSummit/index.html) and the Eighth Annual Economic Summit (https://www.scag.ca.gov/calendar/Pages/8thEconomicSummit.aspx). **SMM-POP-4:** SCAG shall continue to produce the biennial Local Profile reports for all member jurisdictions in the SCAG region for the purpose of data and information sharing. The Local Profiles reports provide a variety of demographic, economic, education, housing, and transportation information that local jurisdictions can utilize like project and program planning. For more information about the most recently release 2019 Local Profiles, please visit: http://www.scag.ca.gov/DataAndTools/Pages/LocalProfiles.aspx.		
Impact POP-2: Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.	**SCAG Level Mitigation Measure**: See SMM-POP-4. **SMM-POP-5:** SCAG shall assist cities to identify funding and financing opportunities and potential partnerships for public infrastructure improvements for transit-oriented development and other smart growth projects.	SCAG	N/A
	Project Level Mitigation Measures **PMM-POP-1**: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce the displacement of existing housing, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Evaluate alternate route alignments and transportation facilities that minimize the displacement of homes and businesses. Use an iterative design and impact analysis where impacts to homes or businesses are involved to minimize the potential of impacts on housing and displacement of people. b) Prioritize the use existing ROWs, wherever feasible. c) Develop a construction schedule that minimizes potential neighborhood deterioration from protracted waiting periods between right-of-way acquisition and construction. d) Review capacities of available urban infrastructure and augment capacities as needed to accommodate demand in locations where growth is desirable to the local lead Agency and encouraged by the SCS (primarily TPAs, where applicable). e) When General Plans and other local land use regulations are amended or updated, use the most recent growth projections and RHNA allocation plan.	Lead Agency	**This Mitigation Measure is not applicable to the project.** The project site is currently developed with a vacant warehouse building. There are no housing units or people dwelling on the project site. No housing would be removed or destroyed, and no displacement would occur.

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Public Services			
Impact PSF-1: Result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives.	**SCAG Mitigation Measures:** See SMM PSP-1 through SMM PSP-4. **SMM PSF-1:** SCAG shall assist planners, first responders, and recovery teams in a supporting role, in three key areas, before a major emergency and during the recovery period: • Provide a policy forum to help develop regional consensus and education on security policies and emergency responses. • Assist in expediting the planning and programming of transportation infrastructure repairs from major disasters. • Encourage integration of transportation security measures into transportation projects early in the project development process by leveraging SCAG's relevant plans, programs, and processes, including regional ITS architecture. An example includes SCAG's participation in the development of the Southern California Catastrophic Earthquake Preparedness Plan.2 **SMM PSF-2:** SCAG shall facilitate minimizing future impacts to fire protection services through information sharing regarding Fire-wise Land Management (data regarding fire-resistant vegetation, fire-resistant materials, locations where development is potentially hazardous in regard to wildfire, and management of brush and other fire risks in the immediate vicinity of development in areas with high fire threat) with county and city planning departments.	SCAG	N/A
	Project Mitigation Measures: See PMM-PSP-1.	Lead Agency	**This Mitigation Measure is incorporated through compliance with regulatory compliance measures and incorporation of project design features.** In compliance with the requirements of OSHA, all construction managers and personnel would be trained in fire prevention and emergency response. Furthermore, fire suppression equipment specific to construction would be maintained on the project site. As applicable, construction activities would be required to comply with the 2019 California Building Code (CBC), the California Fire Code (CFD), and Article 7: Fire Protection and Prevention (Fire Code) of Chapter V: Public Safety and Protection, of the LAMC.

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			For the duration of construction, the rightmost southbound lane on South Hill Street would be closed, and both northbound lanes will remain open. The closest fire station is LAFD Station 10 located approximately 0.3 mile from the project site at 1335 South Olive Street. As at least one travel lane in each direction on South Hill Street would remain open, this would not prevent fire department vehicles or other emergency services from traveling to or past the project site along South Hill Street. During construction, the existing vehicle travel lane along 11th Street would remain open. In addition, the project would implement Construction Management Plan (PDF TRAF-1) that would minimize construction impacts. This Construction Management Plan would include measures such as off-site truck staging; scheduling deliveries and pick-ups of construction materials during non-peak travel periods; a worksite traffic control plan; use of flag men to reroute traffic around any closures; establishment of requirements for loading/unloading and storage of materials to ensure that access would remain unobstructed for land uses in proximity to the project site; and coordination with the City and emergency service providers to ensure adequate access is maintained to the project site and adjacent uses. With incorporation of applicable regulatory requirements (i.e., building design, fire safety features, emergency safety provisions, LAFD access) ability to meet fire water supply needs, and close distance to several LAFD stations, implementation of a Construction Management Plan, the project would not result in a substantial

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			increase in demand for additional fire protection services that would exceed the capability of the LAFD to serve the project such that it would require construction of new fire facilities. Furthermore, the LAFD would review the project and make recommendations, including any potential modifications to building plans to reduce the risk and susceptibility of spread of fires, as determined by LAFD.
Impact PSP-1: Result in substantial adverse physical impacts associated with the provision of new or physically altered police facilities, need for new or physically altered police facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives.	**SCAG Mitigation Measures:** See SMM PSF-1. **SMM PSP-1:** SCAG shall facilitate minimizing future impacts to library services through cooperation, information sharing, and regional program development as part of SCAG's ongoing regional planning efforts, such as web-based planning tools for local government including CA LOTS, and other GIS tools and data services, including, but not limited to Map Gallery, GIS library, and GIS applications, and promote acceptable service ratios regarding library services. **SMM PSP-2:** SCAG shall help to enhance the region's ability to deter and respond to acts of terrorism, human- caused or natural disasters through regionally cooperative and collaborative strategies. SCAG shall work with local officials to develop regional consensus on regional transportation safety, security, and safety security policies. **SMM PSP-3:** SCAG shall help to enhance the region's ability to deter and respond to terrorist incidents, human- caused or natural disasters by strengthening relationship and coordination with transportation. This will be accomplished by the following: • SCAG shall work with local officials to develop regional consensus on regional transportation safety, security, and safety security policies. • SCAG shall encourage all SCAG elected officials are educated in NIMS. SCAG shall work with partner agencies, federal, state and local jurisdictions to improve communications and interoperability and to find opportunities to leverage and effectively utilize transportation and public safety/security resources in support of this effort. **SMM PSP-4:** SCAG shall encourage and provide a forum for local jurisdictions to develop mutual aid agreements for essential government services during any incident recovery.	SCAG	N/A

	Project Mitigation Measures **PMM PSP-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of constructing new emergency response facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: • Coordinate with emergency response agencies to ensure that there are adequate governmental facilities to maintain acceptable service ratios, response times or other performance objectives for emergency response services and that any required additional construction of buildings is incorporated into the project description. • Where current levels of services at the project site are found to be inadequate, provide fair share contributions towards infrastructure improvements, as appropriate and applicable, to mitigate identified CEQA impacts. Project sponsors can and should develop traffic control plans for individual projects. Traffic control plans should include information on lane closures and the anticipated flow of traffic during the construction period. The basic objective of each traffic control plan (TCP) is to permit the contractor to work within the public right of way efficiently and effectively while maintaining a safe, uniform flow of traffic. The construction work and the public traveling through the work zone in vehicles, bicycles or as pedestrians must be given equal consideration when developing a traffic control plan.	Lead Agency	**This Mitigation Measure is incorporated through incorporation of project design features.** For the duration of construction, the rightmost southbound lane on South Hill Street will be closed, and both northbound lanes would remain open. As at least one travel lane in each direction on South Hill Street would remain open and would not prevent police or other emergency services from traveling to or past the project site along South Hill Street. During construction, the existing vehicle travel lane along 11th Street would remain open, but the four parking spots adjacent to the project, which are currently not metered, would be closed. LAPD and other emergency vehicles traveling along Olive Street would continue to have access to one westbound lane on 11th Street, the same as existing conditions. In addition, the project would implement a Construction Management Plan (PDF-TRAF-1) that would minimize construction impacts. The Construction Management Plan would include measures such as off-site truck staging; scheduling deliveries and pick-ups of construction materials during non-peak travel periods; a worksite traffic control plan; use of flag men to reroute traffic around any closures; establishment of requirements for loading/unloading and storage of materials to ensure that access would remain unobstructed for land uses in proximity to the project site; and coordination with the City and emergency service providers to ensure adequate access is maintained to the project site and adjacent uses. The project would follow the LAPD recommendations to encourage project design that incorporates strategies from Crime Prevention through Environmental Design (CPTED).

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			In addition, the project would implement the following project design features to minimize impacts to police services: **PDF-PS-1**. A construction fence shall be constructed around the project site to minimize trespassing, vandalism, short-cut attractions and attractive nuisances. **PDF-PS-2**. Prior to the occupancy of the project, the Applicant shall provide the Central Area Commanding Officer with a diagram of each portion of the property, including access routes, and additional information to facilitate potential LAPD responses. **PDF PS-3**. The project will would incorporate security measures for the safety of residents, TORS guests, employees, and visitors to the project site. During operation of the project, traffic access to the residential parking areas from South Hill Street would be controlled and access to the lower levels would be remain open for commercial and TORs unit parking. Access to parking via the alley entrance would be controlled though gated entries outside of business hours and the entry areas would be well illuminated. Site security would include controlled keycard access to residential and TORs unit areas, parking areas, patrolled security for TORs units areas, secured entry and exit points to all buildings, alarmed systems for commercial areas, and security lighting within common areas and entryways, and closed-circuit TV monitoring (CCTV). As indicated by the letter from the LAPD, date. June 23, 2020 and December 15, 2021, (Appendix J), there are no planned improvements to

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			police facilities in the service area of the project site and the project would not create special police protection requirements. Furthermore, the LAPD also indicates that the project individually or combined with other present and future projects would not result in the need for a new or altered police facility.
Impact PSS-1: Result in substantial adverse physical impacts associated with the provision of new or physically altered educational facilities, need for new or physically altered educational facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives.	**SCAG Mitigation Measure** **SMM PSS-1:** SCAG shall facilitate minimizing future impacts to school services through cooperation, information sharing, and regional program development as part of SCAG's ongoing regional planning efforts, such as web-based planning tools for local government including CA LOTS, and other GIS tools and data services, including, but not limited to, Map Gallery, GIS library, and GIS applications, and direct technical assistance efforts to promote school planning efforts.	SCAG	N/A
	Project Mitigation Measure **PMM PSS-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of constructing new or physically altered school facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Where construction or expansion of school facilities is required to meet public school service ratios, require school district fees, as applicable.	Lead Agency	**This Mitigation Measure is incorporated through compliance with regulatory compliance measures** **RCM-PS-1.** The Applicant shall pay school fees to the Los Angeles Unified School District to offset the impact of additional student enrollment at schools serving the project area.
Impact PSL-1: Result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, need for new or physically altered library facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives.	**SCAG Mitigation Measure** **SMM PSL-1:** SCAG shall facilitate minimizing future impacts to library services through cooperation, information sharing, and regional program development as part of SCAG's ongoing regional planning efforts, such as web-based planning tools for local government including CA LOTS, and other GIS tools and data services, including, but not limited to Map Gallery, GIS library, and GIS applications, and promote acceptable service ratios regarding library services.	SCAG	N/A
	Project Mitigation Measure **PMM PSL-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of construction of new or altered library facilities, as applicable and	Lead Agency	**This Mitigation Measure is not applicable to the project.** The project would result in a net increase in residential population of approximately 900 residents. The closest library is the Richard J. Riordan Central Library located 0.77 mile from project site and

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	feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Where construction or expansion of library facilities is required to meet public library service ratios, require library fees, as appropriate and applicable, to mitigate identified CEQA impacts.		thus would be expected to be the primary facility used by project residents. There are currently no plans of physical improvements involving construction or expansion to any facilities in the project area. The Richard J. Riordan Central Library has an unspecified facility size criteria and as such could accommodate the library service needs of the project, especially considering that it is the closest library to the project site. In addition, the project's residential units would be equipped to receive individual internet service, which would offer residents the opportunity to access the LAPL's online database system that includes podcasts, audiobooks, media publications, and instructional content. The remote availability of such resources reduces the demand for physical library space. In addition, the project would generate revenue for the City's general fund that could be used for the provision of public services such as library facilities.
Parks and Recreation			
Impact REC-1: Potential to 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.	**SCAG Mitigation Measure:** See SMM USWS-1. **SMM REC-1:** SCAG shall continue the commitment to analyze public health outcomes as part of the Regional Transportation Plan/Sustainable Communities Strategy (Plan). As part of the public health analysis for the Plan, SCAG shall continue to analyze resident access to parks and recreational facilities from a county level to help local jurisdictions to improve resident access to parks. SCAG shall communicate the impacts of the Plan through its Public Health Working group, and continue to support policy changes at the city and county level through educational programs.	SCAG	N/A
	Project Level Mitigation Measures **PMM REC-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on the use of existing neighborhood and regional parks or other	Lead Agency	**This Mitigation Measure is not applicable to the project.** The project would provide 55,706 square feet of open space and amenities. The availability of these on-site recreation amenities and opportunities would

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	recreational facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, consider increasing the accessibility to natural areas and lands for outdoor recreation from the proposed project area, in coordination with local and regional open space planning and/or responsible management agencies. b) Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, encourage patterns of urban development and land use which reduce costs on infrastructure and make better use of existing facilities, using strategies such as: • Increasing the accessibility to natural areas for outdoor recreation • Utilizing "green" development techniques • Promoting water-efficient land use and development • Encouraging multiple uses, such as the joint use of schools • Including trail systems and trail segments in General Plan recreation standards.		serve to reduce the demand for off-site park services. There are numerous existing, new, and recently improved parks within the project area available to serve the future residents, guests, and retail visitors to the project site. Accordingly, the project would not substantially 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. In addition, the project Applicant would be responsible for meeting the parkland dedication or fee requirements pursuant to the Quimby Act and applicable LAMC requirements, as necessary.
Impact REC-2: Result in substantial adverse physical impacts associated with the provision of new or physically altered park facilities, need for new or physically altered park facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, or other performance objectives. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.	**SCAG Mitigation Measure**: See SMM REC-1.	SCAG	N/A
	Project Level Mitigation Measures: See PMM REC-1, PMM AQ-2, and PMM NOISE-1.	Lead Agency	**This Mitigation Measure is not applicable to the project.** There are numerous existing, new, or recently improved parks within the project area that are available to serve the future residents, guests, and visitors to the project site. The project would be required to include 55,575 sf of open space. The project would fulfill this requirement by providing 55,706 sf of open space. The project's increased demands upon recreational facilities would not in and of itself require or result in the construction of a new park, which might have an adverse physical effect on the environment. Thus, impacts to park and recreational facilities would be less than significant.

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Transportation, Traffic, and Safety			
Impact TRA-1: Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.	No mitigation is required.	N/A	
Impact TRA-2: Conflict or be inconsistent with CEQA Guidelines section 15064.3(b).	**SCAG Mitigation Measures** **SMM TRA-1:** SCAG shall facilitate minimizing VMT and related vehicular delay by minimizing impacts to circulation and access, improve mobility, and encourage transit and Active Transportation via workshops (i.e., Mobility 21 workshop and Regional Transportation Workgroups) and web-based planning tools for local governments, forums with policy makers, and County Transportation Commissions, Planning Agencies, member cities, and state partners. **SMM TRA-2:** SCAG shall identify further reduction in VMT set forth by CARB, and fuel consumption that could be obtained through land-use strategies, additional car-sharing programs with linkage to public transportation, additional vanpools, additional bicycle sharing and parking programs, and implementation of a universal employee transit access pass (TAP) program. **SMM TRA-3:** SCAG shall continue to facilitate an SB 743 implementation program. Following initiation in 2018, the Sustainable Communities Program will continue to provide direct planning resources to support jurisdictions seeking to establish vehicle miles traveled (VMT) as the metric for evaluating transportation impacts, which will result in more efficient development patterns and support a comprehensive strategy for regional mitigation options. The SB 743 implementation program is a State grant-funded project, co-sponsored by SCAG and LADOT, which seeks to provide technical and mitigation strategy development guidance to local jurisdictions in the six-county SCAG region to facilitate implementation of the VMT- based CEQA transportation impact analysis provisions of SB 743. This coordinated program of technical guidance, evaluation of options, and cooperative engagement with local communities will serve to smooth the transition to the new VMT-reducing development paradigm, helping to ensure a successful region-wide implementation of SB 743 and attainment of the associated GHG reduction goals. Some of the primary features of the scope of work include: • Evaluate the feasibility of various alternative VMT mitigation options, including local and regional VMT exchange and banking programs. • Establish CEQA nexus to reduce VMT through a VMT mitigation exchange or banking program alternative. • Substantiate the legal basis of a VMT exchange program for satisfying CEQA mitigation requirements.	SCAG	N/A

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	• Collaborate with other communities and jurisdictions to reduce VMT through implementation of a VMT mitigation exchange or bank program. • Improve the dissemination of transportation project VMT mitigation options. • Support a variety of TDM strategies for Transportation Management Organization (TMO) membership agencies. Provide guidance to facilitate establishment of VMT mitigation exchange or bank programs throughout the region and state **SMM TRA-4:** SCAG shall continue to analyze and develop potential implementation strategies for a regional, market-based system to price or charge for auto trips during peak hours. **SMM TRA-5:** SCAG shall develop a vanpool program for SCAG employees' commute trips. **SMM TRA-6:** SCAG shall encourage new developments to incorporate both local and regional transit measures into the project design that promote the use of alternative modes of transportation.		
	Project Level Mitigation Measures **PMM-TRA-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation-related impacts, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: • Transportation demand management (TDM) strategies should be incorporated into individual land use and transportation projects and plans, as part of the planning process. Local agencies should incorporate strategies identified in the Federal Highway Administration's publication: Integrating Demand Management into the Transportation Planning Process: A Desk Reference (August 2012) into the planning process (FHWA 2012). For example, the following strategies may be included to encourage use of transit and non-motorized modes of transportation and reduce vehicle miles traveled on the region's roadways: o include TDM mitigation requirements for new developments; o incorporate supporting infrastructure for non-motorized modes, such as, bike lanes, secure bike parking, sidewalks, and crosswalks; o provide incentives to use alternative modes and reduce driving, such as, universal transit passes, road and parking pricing; o implement parking management programs, such as parking cash-out, priority parking for carpools and vanpools;	Lead Agency	**This Mitigation Measure is incorporated through compliance with regulatory compliance measures and incorporation of project design features** A *1111 S Hill Street Traffic Assessment* was prepared for the project by Fehr & Peers dated August 2020 and the Memorandum: *1111 S Hill Street Revised Project Analysis* (Memorandum) was prepared by Fehr & Peers dated July 7, 2021. On December 29, 2020 the Department of Transportation (DOT) issued an assessment for project and approved the methodology of the VMT analysis for the TA prepared in August 2020. As the original Traffic Assessment dated August 2020 did not include TORS units, Fehr & Peers prepared the Memorandum that evaluated the potential transportation impacts of the proposed project with the inclusion of the TORS units. Both analyses are based on LADOT Transportation Assessment Guidelines (TAG) and Appendix G of the CEQA Guidelines

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	○ develop TDM-specific performance measures to evaluate project-specific and system-wide performance; ○ incorporate TDM performance measures in the decision-making process for identifying transportation investments; ○ implement data collection programs for TDM to determine the effectiveness of certain strategies and to measure success over time; and ○ set aside funding for TDM initiatives. The increase in per capita VMT on facilities experiencing LOS F represents a significant impact compared to existing conditions. To assess whether implementation of these specific mitigation strategies would result in measurable traffic congestion reductions, implementing actions may need to be further refined within the overall parameters of the proposed Plan and matched to local conditions in any subsequent project-level environmental analysis.		from the State of California Governor's Office of Planning and Research. This analysis complies with the City's latest guidelines requiring the project be evaluated for transportation impacts in compliance with the State CEQA Guidelines in its implementation of SB 743, which are identified in the TAG. In written correspondence dated December 7, 2021, LADOT concurs with the analysis within the Memorandum that the changes in the project description do not alter the conclusions of the original TA (Appendix K). As part of new State CEQA Guidelines, proposed land use projects need to assess whether they cause a substantial VMT impact. The VMT metric is intended to promote the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses. This encourages development that shortens the distance between housing, jobs, and services, increases the availability of affordable housing options in proximity to public transit, offers attractive non-vehicular transportation alternatives, provides strong transportation demand management programs, and promotes walking and bicycling trips. LADOT developed a VMT Calculator tool to be used to assess the VMT impacts of proposed development projects within the City. The VMT Calculator also assesses the effectiveness of selected transportation demand management (TDM) measures proposed for a project based on available research. Analysis was conducted for the project using the City's VMT analysis procedures and VMT Calculator. As analyzed in the *1111 S Hill Street Traffic Assessment*,

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			the project is estimated by the VMT Calculator to produce a total of 2,001 daily vehicle trips and a total daily VMT of 11,674. The daily household VMT per capita is estimated at 3.7, below the threshold of 6.0 for the Central Area Planning Commission (APC) area. As documented in the Memorandum dated July 7, 2021 (Appendix K), the City's VMT calculator does not have a vehicle trip rate for an extended stay hotel (TORS) land use. Given this, one way to estimate the effect of the TORS units was to add 160 multi-family housing units to the VMT calculator, to account for the more residential-type trip behavior that may be expected from guests of a TORS unit. The test concluded that adding residential units to the VMT calculator would not affect the Household VMT per capita metric, since increasing the number of people staying at the project would increase the VMT proportionally and results in the same per capita outcome. Because these additional household units are to operate as extended-stay TORS units and are unlikely to result in new residents who work on the property, the tested Work VMT per Employee result would be an underestimate, so it was determined that original VMT per Employee contained in the Transportation Assessment dated August 2020 would be more representative of the project. Therefore, the project with the inclusion of the TORS units would not result in a significant VMT impact. Therefore, with the inclusion of the TORS units, the project would not result in a different conclusion to the original Transportation Assessment submitted to LADOT in August 2020 and impacts would remain less than significant.

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			Thus, the project would not have a significant impact on household VMT per capita as estimated by the VMT Calculator. In addition, the daily work VMT per employee is estimated at 7.3, below the threshold of 7.6 for the Central APC area. Thus, the project would not have a significant impact on work VMT per employee as estimated by the VMT Calculator. A TDM program consists of strategies that are aimed at discouraging single-occupancy vehicle trips and encouraging alternative modes of transportation, such as carpooling, taking transit, walking, and biking. Strategies included in a typical TDM program address a wide range of transportation factors, including parking, transit, commute trips, shared mobility, bicycle infrastructure, site design, education and encouragement, and management. Given that the project would not have a significant impact on VMT, the project does not propose a TDM plan as a mitigation measure. However, the project's location and provision of short-term and long-term on-site bicycle parking contribute to encouraging alternative modes of transportation.
Impact TRA-3: Substantially increase hazards due to geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).	No mitigation is required.	N/A	
Impact TR-4: Result in inadequate emergency access. Impact WF-1: Substantially impair an adopted emergency response plan or emergency evacuation plan.	**SCAG Mitigation Measures** **SMM TRA-7:** SCAG shall, in cooperation with local and state agencies, identify critical infrastructure needs necessary for: a) emergency responders to enter the region, b) evacuation of affected facilities, and c) restoration of utilities. In addition, SCAG shall establish transportation infrastructure practices that promote and enhance security.	SCAG	N/A

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	SMM TRA-8: SCAG shall provide a forum for collaboration in planning, communication, and information sharing before, during, or after a regional emergency (i.e., seismic activities, wildfires, and other natural disasters). This will be accomplished by the following: • SCAG shall develop and incorporate strategies and actions pertaining to response and prevention of security incidents and events as part of the on-going regional planning activities. • SCAG shall offer a regional repository of GIS data for use by local agencies in emergency planning, and response, in a standardized format. SCAG shall enter into mutual aid agreements with other MPOs (as feasible) to provide this data, in coordination with the California OES in the event that an event disrupts SCAG's ability to function.		
	Project Level Mitigation Measures **PMM TRA-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects which may substantially impair implementation of an adopted emergency response plan or emergency evacuation plan, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: c) Prior to construction, project implementation agencies can and should ensure that all necessary local and state road and railroad encroachment permits are obtained. The project implementation agency can and should also comply with all applicable conditions of approval. As deemed necessary by the governing jurisdiction, the road encroachment permits may require the contractor to prepare a traffic control plan in accordance with professional engineering standards prior to construction. Traffic control plans can and should include the following requirements: • Identification of all roadway locations where special construction techniques (e.g., directional drilling or night construction) would be used to minimize impacts to traffic flow. • Development of circulation and detour plans to minimize impacts to local street circulation. This may include the use of signing and flagging to guide vehicles through and/or around the construction zone. • Scheduling of truck trips outside of peak morning and evening commute hours. • Limiting of lane closures during peak hours to the extent possible. • Usage of haul routes minimizing truck traffic on local roadways to the extent possible.	Lead Agency	**This Mitigation Measure is incorporated through incorporation of project design features**. Emergency access to the project site would be provided by the existing street system, and the project is designed and would be constructed in accordance with LAMC requirements to ensure proper emergency access. In addition, as part of the project, a detailed Construction Management Plan, included as PDF TRAF-1 below, would be implemented. **PDF TRAF-1**: The Applicant shall prepare a detailed Construction Management Plan that shall include, but not be limited to, the following elements, as appropriate: • Provide off-site truck staging in a legal area furnished by the construction truck contractor. • Schedule deliveries and pick-ups of construction materials during non-peak travel periods to the extent possible and coordinate to reduce the potential of trucks waiting to load or unload for protracted periods. • As parking, travel lane, and/or sidewalk closures are anticipated,

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	• Inclusion of detours for bicycles and pedestrians in all areas potentially affected by project construction. • Installation of traffic control devices as specified in the California Department of Transportation Manual of Traffic Controls for Construction and Maintenance Work Zones. • Development and implementation of access plans for highly sensitive land uses such as police and fire stations, transit stations, hospitals, and schools. The access plans would be developed with the facility owner or administrator. To minimize disruption of emergency vehicle access, affected jurisdictions can and should be asked to identify detours for emergency vehicles, which will then be posted by the contractor. Notify in advance the facility owner or operator of the timing, location, and duration of construction activities and the locations of detours and lane closures. • Storage of construction materials only in designated areas. • Coordination with local transit agencies for temporary relocation of routes or bus stops in work zones, as necessary. • Ensure the rapid repair of transportation infrastructure in the event of an emergency through cooperation among public agencies and by identifying critical infrastructure needs necessary for: a) emergency responders to enter the region, b) evacuation of affected facilities, and c) restoration of utilities. • Enhance emergency preparedness awareness among public agencies and with the public at large.		worksite traffic control plan(s), approved by the City of Los Angeles, should be implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures. • Determine with the City the number and location of flag men required to reroute traffic and accommodate deliveries as needed. • Establish requirements for loading/unloading and storage of materials on the project site, where parking spaces would be encumbered, length of time traffic travel lanes can be encumbered, sidewalk closings or pedestrian diversions to ensure the safety of the pedestrian and access to local businesses and residences. • Ensure that access will remain unobstructed for land uses in proximity to the project site during project construction. • Coordinate with the City and emergency service providers to ensure adequate access is maintained to the project site and neighboring businesses, residences, and other ongoing projects such as the downtown LA Streetcar. • Construction notices/hotline will be posted at several locations on the project site. The Construction Management Plan would be prepared and submitted to the City for review and approval. The Construction Management Plan would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community and avoid congestion. Implementation of

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			the Construction Management Plan would ensure that vehicle and emergency vehicle access would be maintained throughout the course of construction activities. Project access for operation would be designed to LADOT standards and reviewed by City staff. In addition, the project is required to meet LAMC code requirements for adequate emergency access and comply with LAFD access requirements. In addition, the project is required to provide adequate emergency access including access for LAFD apparatus and personnel to the project site in accordance with LAFD requirements. The project would comply with LAFD requirements inclusive of standards regarding fire lane widths and weight capacities needed to support fire fighting vehicles, markings and on-site vehicle restrictions to ensure safe access. LAFD approval of plot plans showing fire hydrants and access for each phase of the project would be required prior to the recording of the final map for that phase. LAFD approval of definitive plans and specifications, and any associated permits, would be required prior to commencement of any portion of the project. No policy or procedural changes to an existing emergency response plan or evacuation plan would be required due to operation of the project. Furthermore, during an unanticipated disaster event, City and County agencies (i.e., Police and Fire Departments) would implement operational protocols, as well as plans and programs, on a case by-case basis to facilitate emergency evacuations and/or response, which would consider traffic conditions at the time of the emergency. In such instances, traffic

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			would be routed along the City's disaster routes, as determined appropriate, by the applicable responding City agencies.
Tribal and Cultural Resources			
Impact TCR-1: Cause a substantial adverse change in the significance of a tribal cultural resource defined in Public Resources Code section 21074 that is: a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision © of Public Resources Code Section 5024.1.	**SCAG Mitigation Measure** **SMM TCR-1:** SCAG shall consult with the Native American Heritage Commission, as well as Native American tribes, to identify opportunities for early and effective consultation to identify tribal cultural resources to avoid such resources wherever practicable and feasible and reduce or mitigate for conflicts in compatible land use to the maximum extent practicable.	SCAG	N/A
	Project Level Mitigation Measures: See PMM CULT-1. **PMM TCR-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on tribal cultural resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Avoidance and preservation of the resources in place, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria; b) Treating the resource with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following: protecting the cultural character and integrity of the resource; protecting the traditional use of the resource; and protecting the confidentiality of the resource; c) Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places; and protecting the resource.	Lead Agency	**This Mitigation Measure is incorporated through compliance with regulatory compliance measures and incorporation of project design features.** The project area is heavily urbanized and developed with various urban uses; therefore, the potential to encounter intact Tribal Cultural Resources (TCR) is very low. However, in the event that a TCR is encountered during construction activities, all work will pause and the project proponent shall comply with the inadvertent discovery condition applied to the project. The project site and immediately surrounding area do not contain any known archaeological sites. In addition, a sacred lands file search was requested from NAHC on April 14, 2020. NAHC responded that the Sacred Lands File yielded negative results for TCRs. Therefore, the project would not be expected to result in significant impacts on TCRs related to a substantial adverse change in the significance of a TCR.

Topic	2020-2045 RTP/SCS PEIR Mitigation Measures	Responsible Party	Applicability to Project
Utilities and Service Systems			
Impact USSW-1: 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 Impact USSW-2: Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.	**SCAG Mitigation Measures** **SMM USSW-1:** During the planning, design, and project-level CEQA review process for individual development projects, SCAG shall coordinate with waste management agencies and the appropriate local and regional jurisdictions to facilitate the development of measures and to encourage diversion of solid waste such as recycling and composting programs, as needed. This includes discouraging siting of new landfills unless all other waste reduction and prevention actions have been fully explored to minimize impacts to neighborhoods. **SMM USSW-2:** SCAG shall coordinate with waste management agencies, and the appropriate local and regional jurisdictions, measures to facilitate and encourage diversion of solid waste such as recycling and composting programs.	SCAG	N/A
	Project Level Mitigation Measures **PMM USSW-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce the generation of solid waste, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: Integrate green building measures with CALGreen (California Building Code Title 24) into project design, including but not limited to the following: a) Reuse and minimization of construction and demolition (C&D) debris and diversion of C&D waste from landfills to recycling facilities. b) Inclusion of a waste management plan that promotes maximum C&D diversion. c) Source reduction through (1) use of materials that are more durable and easier to repair and maintain, (2) design to generate less scrap material through dimensional planning, (3) increased recycled content, (4) use of reclaimed materials, and (5) use of structural materials in a dual role as finish material (e.g., stained concrete flooring, unfinished ceilings, etc.). d) Reuse of existing structure and shell in renovation projects. e) Development of indoor recycling program and space. f) Discourage the siting of new landfills unless all other waste reduction and prevention actions have been fully explored. If landfill siting or expansion is necessary, site landfills with an adequate landfill-owned, undeveloped land buffer to minimize the potential adverse impacts of the landfill in neighboring communities.	Lead Agency	**This Mitigation Measure is incorporated through compliance with regulatory compliance measures.** The project would comply with the City of Los Angeles Green Building Code, which requires the recycling and/or salvaging of 65 percent of non-hazardous construction and demolition waste. Construction and Demolition materials would be conveyed pursuant to the City's Waste Hauler Permit Program (Ordinance 181519), effective January 1, 2011. Under this Ordinance, all private waste haulers collecting solid waste within the City, including C&D waste, are required to obtain Assembly Bill 939 (AB 939) Compliance Permits and to transport C&D waste to City certified C&D processing facilities. The project would comply with the City's Solid Waste Integrated Resources Plan (SWIRP), most commonly known as the City's Zero Waste Plan, provides a long-term plan through 2030 for the City of Los Angeles's solid waste programs, policies and environmental infrastructure. The SWIRP aims for the City of Los Angeles to achieve a goal of

Topic	2020-2045 RTP/SCS PEIR Mitigation Measures	Responsible Party	Applicability to Project
	g) Discourage exporting of locally generated waste outside of the SCAG region during the construction and implementation of a project. Encourage disposal within the county where the waste originates as much as possible. Promote green technologies for long-distance transport of waste (e.g., clean engines and clean locomotives or electric rail for waste-by-rail disposal systems) and consistency with SCAQMD and Connect SoCal policies can and should be required. h) Encourage waste reduction goals and practices and look for opportunities for voluntary actions to exceed the 80 percent waste diversion target. i) Encourage the development of local markets for waste prevention, reduction, and recycling practices by supporting recycled content and green procurement policies, as well as other waste prevention, reduction and recycling practices. j) Develop ordinances that promote waste prevention and recycling activities such as: requiring waste prevention and recycling efforts at all large events and venues; implementing recycled content procurement programs; and developing opportunities to divert food waste away from landfills and toward food banks and composting facilities. k) Develop and site composting, recycling, and conversion technology facilities that have minimum environmental and health impacts. l) Integrate reuse and recycling into residential industrial, institutional and commercial projects. m) Provide education and publicity about reducing waste and available recycling services. n) Implement or expand city or county-wide recycling and composting programs for residents and businesses. This could include extending the types of recycling services offered (e.g., to include food and green waste recycling) and providing public education and publicity about recycling services.		90 percent diversion by 2025. This targeted diversion rate is implemented through an enhancement of existing policies and programs such as implementing additional downstream programs (e.g., adding textiles to the blue bin recycling program; adding food scraps to the green bin recycling program; and requiring private solid waste collection service to provide access to multifamily and commercial customers); implementation of mandatory participation programs for residential, government, commercial, industrial, and institutional users; and requiring transfer stations and landfills to provide resource recovery centers. **RCM-PU-3**. In compliance with LAMC Section 66.32.1, the project shall incorporate the following: • Prior to the issuance of any demolition or construction permit, the Applicant shall provide a copy of the receipt or contract from a waste disposal company providing services to the project, specifying recycled waste service(s), to the satisfaction of the Department of Building and Safety. The demolition and construction contractor(s) shall only contract for waste disposal services with a company that recycles demolition and/or construction-related wastes. • To facilitate on-site separation and recycling of demolition- and construction related wastes, the contractor(s) shall provide temporary waste separation bins on-site during demolition and construction. These bins shall be emptied and the contents recycled accordingly as a part of the project's regular solid waste disposal program.

Topic	2020-2045 RTP/SCS PEIR Mitigation Measures	Responsible Party	Applicability to Project
Impact USWW-1: Require or result in the relocation or construction of new or expanded wastewater treatment or storm drainage facilities, the construction or relocation of which could cause significant environmental effects.	**SCAG Mitigation Measures** **SMM-USWW-1:** SCAG shall work with local jurisdictions and wastewater agencies to encourage regional-scale planning for improved wastewater and stormwater management. Future impacts to wastewater and stormwater facilities shall be avoided to the extent practical and feasible through cooperative planning, information sharing, and comprehensive pollution control measure development within the SCAG region. This cooperative planning shall occur as part of current and existing coordination, an integral part of SCAG's ongoing regional planning efforts.	SCAG	N/A
	Project Level Mitigation Measures: See PMM-HYD-1. **PMM-USWW-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on utilities and service systems, particularly for construction of wastewater facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: • During the design and CEQA review of individual future projects, implementing agencies and projects sponsors shall determine whether sufficient wastewater capacity exists for the proposed projects. There CEQA determinations must ensure that the proposed development can be served by its existing or planned treatment capacity. If adequate capacity does not exist, project sponsors shall coordinate with the relevant service provider to ensure that adequate public services and utilities could accommodate the increased demand, and if not, infrastructure improvements for the appropriate public service or utility shall be identified in each project's CEQA documentation. The relevant public service provider or utility shall be responsible for undertaking project-level review as necessary to provide CEQA clearance for new facilities.	Lead Agency	**This Mitigation Measure is incorporated through compliance with regulatory compliance measures.** Wastewater generation from project construction activities is not anticipated to cause a measurable increase in wastewater flows. A Wastewater Services Information (WWSI) request was submitted to the Los Angeles Bureau of Sanitation (BOS) for discharge of 100 percent of the project's sewer flowing to the 24 inch main line in Hill Street. The WWSI is a review that is performed by the City of Los Angeles BOS to evaluate the existing sewer system and determine if there is adequate capacity to safely convey sewage from proposed development projects, proposed construction projects, proposed groundwater dewatering projects and proposed increases of sewage from existing facilities. The approved WWSI was received from BOS on July 13, 2021 for the most conservative project demand of 139,885 GPD. The design capacity of the Hyperion Service Area is approximately 550 MGD (consisting of 450 MGD at the Hyperion Water Reclamation Plant, 80 MGD at the Donald C. Tillman Water Reclamation Plant, and 20 MGD at the Los Angeles–Glendale Water

Topic	2020-2045 RTP/SCS PEIR Mitigation Measures	Responsible Party	Applicability to Project
			Reclamation Plant). The proposed wastewater generation is equivalent to far less than one percent of the Hyperion Water Reclamation Plant's capacity where the project's wastewater would be treated. The project would be designed to comply with the City of Los Angeles's LID design standard. Consistent with LID requirements to reduce the quantity and improve the quality of rainfall runoff that leaves the project site, the project would include the installation of capture and use and/or biofiltration system BMPs as established by the LID Manual. The installed BMP systems would be designed with an internal bypass overflow system to prevent upstream flooding during major storm events. Drainage structures and improvements within the City are subject to review and approval by the City's Department of Public Works and LADBS. As required by the Department of Public Works, all public storm facilities must be designed in conformity with the standards set forth by Los Angeles County. The Department of Public Works reviews and approves Municipal Separate Storm Sewer Systems plans prior to construction. Any proposed increases in discharge directly into County facilities, or proposed improvements of County-owned Municipal Separate Storm Sewer System facilities, such as catch basins and drainage lines, require approval from County Flood Control to ensure compliance with the County's Municipal NPDES Permit requirements. Furthermore, the following regulatory compliance measures would be implemented as part of the project:

Topic	2020-2045 RTP/SCS PEIR Mitigation Measures	Responsible Party	Applicability to Project
			RCM-PU-1. Prior to issuance of grading permits, the Applicant shall submit a Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan to the City of Los Angeles Bureau of Sanitation Watershed Protection Division for review and approval. The Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook. **RCM-PU-2**. The project shall comply with Ordinance No. 170,978 (Water Management Ordinance), which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season).
Impact USWW-2: 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.	**SCAG Mitigation Measures**: See SMM UWW-1, SMM HYD-1 through SMM HYD-3.	SCAG	N/A
	Project Level Mitigation Measures: See PMM UWW-1.	Lead Agency	**This Mitigation Measure is incorporated through compliance with regulatory compliance measures.** Furthermore, given the current capacity of the Hyperion Service Area, the Hyperion Treatment Plant would have ample capacity to serve the project's wastewater generation, and as concluded in the Sewer Capacity Availability Review (SCAR) the BOS would have adequate capacity to serve the project.
	SCAG Mitigation Measure	SCAG	N/A

Topic	2020-2045 RTP/SCS PEIR Mitigation Measures	Responsible Party	Applicability to Project
Impact USWS-1: Require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects.	**SMM USWS-1:** SCAG shall coordinate with local agencies as part of SCAG's Sustainability Program regarding the implementation of Urban Greening, Greenbelts and Community Separator land use strategies. Primary features of land use strategies address the following: • Increased trail and greenway connectivity; • Improved water quality, groundwater recharge and watershed health; • Strategies for stormwater and rainwater collection, infiltration, treatment and release; • Reduce urban runoff; • Expand the urban forest; • Provision of wildlife habitat and increased biodiversity; • Expand recreation opportunities and beautification; • Preserving agrarian economies; • Restore severed wildlife corridors.		
	Project Level Mitigation Measures **PMM USWS-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to ensure sufficient water supplies, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Reduce exterior consumptive uses of water in public areas, and should promote reductions in private homes and businesses, by shifting to drought-tolerant native landscape plantings, using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives. b) Promote the availability of drought-resistant landscaping options and provide information on where these can be purchased. Use of reclaimed water especially in median landscaping and hillside landscaping can and should be implemented where feasible. c) Implement water conservation best practices such as low-flow toilets, water-efficient clothes washers, water system audits, and leak detection and repair. d) For projects located in an area with existing reclaimed water conveyance infrastructure and excess reclaimed water capacity, use reclaimed water for non- potable uses, especially landscape irrigation. For projects in a location planned for future reclaimed water service, projects should install dual plumbing systems in anticipation of future use. Large developments could treat wastewater onsite to tertiary standards and use it for non-potable uses onsite.	Lead Agency	**This Mitigation Measure is incorporated through compliance with regulatory compliance measures**. The project would require construction of new, on-site water laterals to serve the new building and facilities of the project. Prior to ground disturbance, project contractors would coordinate with LADWP to identify the locations and depth of all lines. Furthermore, the LADWP would be notified in advance of proposed ground disturbance activities to avoid water lines and disruption of water service. Therefore, except for two fire hydrants discussed below, the project would not require the relocation or construction of new or expanded water facilities related to construction of the project. An Information of Fire Flow Availability Request (IFFAR) was submitted to LADWP to determine if any water main upgrades would be required to meet the LAFD requirements. LADWP approved the IFFAR on May 20, 2020, which indicates that

Topic	2020-2045 RTP/SCS PEIR Mitigation Measures	Responsible Party	Applicability to Project
			upgrades to the water mains are not expected. There are currently two hydrants within the vicinity of the project site. There is a hydrant on the west side of Hill Street, 50 feet south of the centerline of 11th Street and a hydrant on the west side of Hill Street, 311 feet south of the centerline of 11th Street. Therefore, two new public fire hydrants will be installed. In addition, a Service Availability Report (SAR) approved on August 26, 2021 for two proposed fire water connections to the building. The pressure reporting from the SARs indicates that the existing 12-inch water main on 11th Street can provide 51 psi of pressure from a single 5,000 gallons per minute (GPM) water service connection. It also demonstrates that the existing 12 inch main in South Hill Street also could provide 42 psi of pressure from a 5,000 GPM water service connection if additional water supply was required. These two results demonstrate that the adjacent water infrastructure is sufficient to meet the project's fire water demands. Therefore, there would be adequate capacity available to accommodate the required fire flows and domestic water demand generated by the project and the project would not require the relocation or construction of new or expanded water facilities.
Impact USWS-2: Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.	**SCAG Mitigation Measure**: See SMM USSW-1.	SCAG	N/A
	Project Level Mitigation Measures: See PMM-USWS-1.	Lead Agency	**This Mitigation Measure is incorporated through compliance with regulatory compliance measures**. Using the City's generation rates for hotel rooms, the project is expected to generate a water demand of 78,950 GPD. Using the City's generation rates for apartment units, the project is expected to generate a

Topic	2020-2045 RTP/SCS PEIR Mitigation Measures	Responsible Party	Applicability to Project
			water demand of 72,962 GPD without accounting for regulatory water conservation features. The project would be designed to meet CALGreen and Title 24 Building Standards Code. The project would emphasize water conservation, which would be achieved through the use of energy star appliances, and low-flow plumbing fixtures. The project's increase in water demand would fall within the available and projected water supplies reported in the Metropolitan Water District's 2020 Regional UWMP for the City for 2045 and would constitute less than 0.01 percent of the City's projected 2045 water supply.
Wildfire			
Impact WF-2: 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. Impact HAZ-7: Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.	**SCAG Mitigation Measures** **SMM WF-1:** SCAG shall facilitate minimizing future impacts to fire protection services through information sharing regarding Fire-wise Land Management (vegetation data, fire-resistant building materials, locations where development is vulnerable to wildfire, and best practices for safe land management) with county and city planning departments. SCAG shall provide an annual forum (or forums) aimed at increased wildfire resilience. Forums shall focus on how high wildfire risk towns, cities, and counties in the region can adopt a wildland-urban interface (WUI) code (or similar code) specifically designed to mitigate the risks from wildfire to life and property. Topics to be addressed will include best practices around: • Structure density and location: number of structures allowed in areas at risk from wildfire, plus setbacks (distance between structures and distance between other features such as slopes). • Building materials and construction: roof assembly and covering, eaves, vents, gutters, exterior walls, windows, non-combustible building materials, and non-combustible surface. • Vegetation management: tree thinning, spacing, limbing, and trimming; removal of any vegetation growing under tree canopies (typically referred to as "ladder fuels"), surface vegetation removal, and brush clearance; vegetation conversion, fuel modifications, and landscaping.	SCAG	N/A

Topic	2020-2045 RTP/SCS PEIR Mitigation Measures	Responsible Party	Applicability to Project
	• Emergency vehicle access and evacuation routes: driveways, turnarounds, emergency access roads, marking of roads, and property address markers. • Water supply: approved water sources and adequate water supply. • Fire protection: automatic sprinkler system, spark arresters, and propane tank storage. The outcome of the forum shall be a summary of actionable items for local planners. Furthermore, SCAG shall examine wildfire risk management strategies in areas where at-risk critical electrical infrastructure is located based on CPUC and CAL FIRE maps. **SMM WF-2:** SCAG, in partnership with technical experts and stakeholders shall launch or continue existing initiatives to help local towns, cities, and counties to protect Southern California communities and economies from the disruption of wildfire occurrences. Initiatives could include but not be limited to seminars that review the risk of wildfire and approaches for preparation, including strengthening of infrastructure, emergency services, emergency evacuation plans and reviewing building safety codes. **SMM WF-3:** SCAG shall develop a Regional Climate Adaptation Framework, which will assist local and regional jurisdictions in managing the negative impacts of wildfires and other hazards caused by climate change. The Climate Adaptation Framework will integrate existing State initiatives, policies, and guidance into the regional framework, helping to connect local and regional land use and transportation planning with State policy goals. The framework will specifically provide communication & outreach strategies and templates for local jurisdictions; toolkits for local jurisdictions to support project implementation, land use, and transportation infrastructure decisions; resources for cities to comply with Senate Bill 379; resources and templates for other metropolitan planning organizations (MPOs); tools and metrics for tracking implementation progress; and a regional framework and coordination strategy. SCAG shall also assist local jurisdictions with wildfire safety requirements for General Plan Updates by providing the most recent fire-risk data and maps from state-wide resources, including isolated areas that could be subject to fire risk with limited egress routes based on the transportation modeling components of SCAG's Regional Climate Adaptation Framework.		
	Project Level Mitigation Measures **PMM WF-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to wildfire risk, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:	Lead Agency	**This Mitigation Measure is not applicable to the project.** The project site is located within a highly urbanized area and is currently developed with a 2-story warehouse building with no natural vegetation. The project site is not located in an area of moderate or very high fire hazard. Additionally, the

Topic	2020-2045 RTP/SCS PEIR Mitigation Measures	Responsible Party	Applicability to Project
	a) Launch fire prevention education for local cities and counties such that local fire agencies, homeowners, as well as commercial and industrial businesses are aware of potential sources of fire ignition and the related procedures to curb or lessen any activities that might initiate fire ignition. b) Ensure structures in high fire risk areas are built to current state and federal standards which serve to greatly increase the chances the structure will survive a wildfire and also allow for people to shelter-in-place. c) Improve road access for emergency response and evacuation so people can evacuate safely and timely when necessary. d) Improve, and educate regarding, local emergency communications and notifications with residents and businesses. e) Enforce defensible space regulations to keep overgrown and unmanaged vegetation, accumulations of trash and other flammable material away from structures. f) Provide public education about wildfire risk and fire prevention measures, and safety procedures and practices to allow for safe evacuation and/or options to shelter-in-place. g) Include external sprinklers with an independent water source to reduce flammability of structures. h) Include local solar power paired with batteries to reduce power flow in electricity lines. i) For developments in high fire-prone areas, have a fire protection plan for residents and businesses. j) Provide fire hazard and fire safety education for homeowners in or near fire hazard areas. k) Developments in fire-prone areas should have fire-resistant feature, such as: • Ember-resistant vents • Fire-resistant roofs • Surrounding defensible space • Proper maintenance and upkeep of structures and surrounding area		project site is not located in or near state responsibility areas of lands classified as very high fire hazard severity zones. The project is not located in a sloped area and is surrounded by urban development. As such, the project's construction and operation would not exacerbate wildland risks and would not expose occupants to pollutant concentrations from a wildfire or uncontrolled spread of a wildfire.
Impact WF-3: Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate	**SCAG Mitigation Measures:** See SMM-WF-1, SMM WF-2, SMM AG-4, and SMM BIO-3.	SCAG	N/A
	Project Mitigation Measures: See PMM HAZ-4. **PMM WF-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project	Lead Agency	**This Mitigation Measure is not applicable to the project.** The project site is not located in an area of moderate or very high fire hazard.

Topic	2020-2045 RTP/SCS PEIR Mitigation Measures	Responsible Party	Applicability to Project
fire risks or that may result in temporary or ongoing impacts to the environment.	can and should consider mitigation measures to wildfire risk, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) New development or infrastructure activity within very high hazard severity zones or SRAs shall be required to • Submit a fire protection plan including the designation of fire watch staff; • Maintain water and other fire suppression equipment designated solely for firefighting on site for any construction and maintenance activities; • Locate construction and maintenance equipment in designated "safe areas" such that they do not discharge combustible materials; and Designate trained fire watch staff during project construction to reduce risk of fire hazards.		Additionally, the project site is not located in or near state responsibility areas of lands classified as very high fire hazard severity zones. Therefore, because the project site is not located near a state responsibility area or any very high fire severity zone, with respect to wildfire hazards, construction and operation of the project would not require installation or maintenance of associated that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.
Impact WF-4: Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope stability, or drainage changes.	**SCAG Mitigation Measures**: See SMM-WF-1, SMM WF-2, SMM HYD-3, SMM GEO-1 and SMM GEO-2.	SCAG	N/A
	Project Level Mitigation Measures: See PMM WF-1, PMM WF-2PMM HYD-1, and PMM HAZ-4.	Lead Agency	**This Mitigation Measure is not applicable to the project.** The project site is not located in an area of moderate or very high fire hazard. Additionally, the project site is not located in or near state responsibility areas of lands classified as very high fire hazard severity zones. The project site is not located with a 100-Year flood plain. The project site is relatively flat with little topography that would expose people or structures to landslides. The project would not contain uses or activities that would exacerbate existing environmental conditions. The project site is not located within a landslide inventory area. As such, and combined with the fact that the project site is not within or near a state responsibility area or a very high severity fire zone, there is no impact in relation to risks associated with downslope or downstream flooding or landslides as a result of runoff or post fire slope instability or drainage changes.

CITY OF LOS ANGELES

OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT

INITIAL STUDY AND CHECKLIST

(Article IV B City CEQA Guidelines)

LEAD CITY AGENCY	COUNCIL DISTRICT	DATE
Department of City Planning	14	February 3, 2022

RESPONSIBLE AGENCIES

City of Los Angeles Department of City Planning

PROJECT TITLE/NO.	CASE NO.
1111 S. Hill Street Project	ENV-2018-2857-SCEA

RELATED CASE NOS.	
CPC-2018-2853-TDR-MCUP-CU-DD-SPR AND VTT-82178	☐ **DOES have significant changes from previous actions.** ☒ **DOES NOT have significant changes from previous actions.**

PROJECT DESCRIPTION:

The project would remove the existing vacant warehouse on the project site and one non-protected street tree on the South Hill Street sidewalk and construct a 40-story mixed-use building with up to 319 multi-family residential condominium units, up to 160 Transient Occupancy Residential Structure (TORS) units (dwelling units with kitchens operating as a commercial hotel with occupancy for 30 days or less), and up to 3,429 sf of ground floor commercial uses. The project would include one level of subterranean parking, one level of ground floor commercial uses, three levels of aboveground parking, and 36 stories of residential and TORS uses and amenities. Residential units would be located in levels 14 through 38 with the TORS units located on levels 6 through 13. It is anticipated that the residential unit count would comprise 24 studio units, 144 one-bedroom units, 127 two-bedroom units, 20 three-bedroom units, and 4 three-bedroom penthouse units. The ground floor commercial uses would consist of restaurant uses. Overall, the proposed high-rise building would comprise up to 491,977 sf of floor area and would reach a maximum height of 520 feet above ground level, when accounting for rooftop structures. When the project is complete, the post-dedicated lot area would be 26,683 sf (0.61 acres).

Open space and amenities for the project's residential and TORS uses would include private balconies, landscaped amenity terraces, and recreational amenities. The project would provide for up to 436 vehicle parking spaces, including 325 residential parking spaces and 111 TORS parking spaces. The project would provide three above grade levels of automated parking and one subterranean level with double stackers and an overhead lift system. In addition, the project would provide up to 347 bicycle parking spaces (up to 56 short-term and 291 long-term).

ENVIRONMENTAL SETTING:

The project site is within the City of Los Angeles Central City Community Plan area. The project site is bounded by an alley to the west, South Hill Street to the east, West 11th Street to the north, and a surface parking lot and commercial building to the south. The project site is surrounded by various land uses, including residences, hotels, offices, restaurants, retail uses, parking structures, and surface parking lots. The project site is currently developed with a 2-story warehouse building that has been vacant since approximately 2013, when the building was last

occupied by warehouse uses. There are three non-protected street trees on the South Hill Street sidewalk fronting the project site, and three non-protected street trees are present along the West 11th Street sidewalk.

PROJECT LOCATION

The project site is in downtown Los Angeles in the South Park neighborhood of Los Angeles. The project site is bounded by an alley to the west, South Hill Street to the east, West 11th Street to the north, and a surface parking lot and commercial building to the south. The project site is served by a network of regional transportation facilities providing connectivity to the larger metropolitan area. Primary regional access is provided by Interstate (I) 10 and I-110. I-10 runs east-west and is approximately 0.5 mile south of the project site. I-110 runs north-south and is approximately 0.7 mile west of the project site. Major arterials serving the project site vicinity include 9th Street, Olympic Boulevard, and Pico Boulevard. South Hill Street and West 11th Street provide direct access to the project site.

PLANNING DISTRICT	**STATUS:**
Central City Community Plan	☐ PRELIMINARY ☐ PROPOSED ☒ ADOPTED

EXISTING LAND USE & ZONE	**MAX. DENSITY ZONING**	☒ **DOES CONFORM TO PLAN**
Regional Center Commercial C2-4D-O	13:1 FAR with the Approval of TFAR Unlimited Density	
PLANNED LAND USE & ZONE	**MAX. DENSITY PLAN**	☐ **DOES NOT CONFORM TO PLAN**
Regional Center Commercial C2-4D-O	Unlimited	
SURROUNDING LAND USES	**PROJECT DENSITY**	☐ **NO DISTRICT PLAN**
See Section 2, Project Description	319 Residential Condominium Units and 160 TORS Units	
NAME OF PERSON PREPARING THIS FORM	**TITLE**	
Debbie Lawrence, AICP	Senior City Planner	
TELEPHONE NUMBER	**ADDRESS**	
(213) 978-1163	200 North Spring Street, Room 621 Los Angeles, CA 90012	
SIGNATURE (OFFICIAL) Debbie Lawrence	February 3, 2022	

☞ **DETERMINATION (To be completed by Lead Agency)**

On the basis of this initial evaluation:

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

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

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

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

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

☒ I find that the Project is a qualified "transit priority project" that satisfies the requirements of Sections 21155 and 21155.2 of the Public Resources Code (PRC), and/or a qualified "residential or mixed use residential project" that satisfies the requirements of Section 21159.28(d) of the PRC, and although the project could have a potentially significant effect on the environment, there will not be a significant effect in this case, because the SUSTAINABLE COMMUNITIES ENVIRONMENTAL ASSESSMENT (SCEA) identifies measures that either avoid or mitigate to a level of insignificance all potentially significant or significant effects of the Project.

Debbie Lawrence	Debbie Lawrence
SIGNATURE	**NAME**

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 Section XVII, "Earlier Analysis," 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:

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

    2) 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.

    3) 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:

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

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

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is "Less Than Significant With Mitigation Incorporated" as indicated by the checklist on the following pages.

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

INITIAL STUDY CHECKLIST (To be completed by the Lead City Agency)

☞ **BACKGROUND**

PROPONENT NAME	**PHONE NUMBER**
Crown 1111, LLC	(323) 518-9264
PROPONENT ADDRESS	
P.O. Box 5738 Beverly Hills, CA 90209	
AGENCY REQUIRING CHECKLIST	**DATE SUBMITTED**
Department of City Planning	February 3, 2022
PROPOSAL NAME (If Applicable)	
1111 S. Hill Street Project	

☞ **ENVIRONMENTAL IMPACTS** (Explanations of all potentially and less than significant impacts are required to be attached on separate sheets)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
1. AESTHETICS. 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, or other locally recognized desirable aesthetic natural feature within a city-designated scenic highway?	☐	☐	☐	☒
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?	☐	☐	☒	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐
2. AGRICULTURE AND FOREST RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California 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. 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))?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒
3. AIR QUALITY. Where available, the significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations. Would the project:				
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 air basin 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?	☐	☐	☒	☐
4. BIOLOGICAL RESOURCES. Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the City or regional plans, policies, regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c. Have a substantial adverse effect 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 tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?	☐	☐	☒	☐

	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?	☐	☐	☐	☒
5. CULTURAL RESOURCES: Would the project:				
a. Cause a substantial adverse change in significance of a historical resource pursuant to § 15064.5?	☐	☐	☐	☒
b. Cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA §15064.5?	☐	☐	☒	☐
c. Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐
6. ENERGY. 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?	☐	☐	☒	☐
7. GEOLOGY AND SOILS. Would the project:				
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, caused in whole or in part by the project's exacerbation of the existing environmental conditions? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
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 or soil that is unstable, or that would become unstable as a result of the project, and potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
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?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐
8. GREENHOUSE GAS EMISSIONS. 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?	☐	☐	☒	☐
9. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
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 caused in whole or in part by the project's exacerbation of existing environmental conditions?	☐	☐	☒	☐
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?	☐	☐	☒	☐
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒
10. HYDROLOGY AND WATER QUALITY. Would the project result in:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
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 offsite;	☐	☐	☒	☐
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?	☐	☐	☒	☐
11. LAND USE AND PLANNING. Would the project:				
a. Physically divide an established community?	☐	☐	☐	☒
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?	☐	☐	☒	☐
12. MINERAL RESOURCES. Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
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?	☐	☐	☐	☒
13. NOISE. 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?	☐	☐	☒	☐
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?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
14. POPULATION AND HOUSING. 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?	☐	☐	☐	☒
15. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a. Fire protection?	☐	☐	☒	☐
b. Police protection?	☐	☐	☒	☐
c. Schools?	☐	☐	☒	☐
d. Parks?	☐	☐	☒	☐
e. Other governmental services?	☐	☐	☒	☐
16. RECREATION.				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
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?	☐	☐	☒	☐
17. TRANSPORTATION. Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c. Substantially increase hazards 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?	☐	☐	☒	☐

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒
21. MANDATORY FINDINGS OF SIGNIFICANCE.				
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 which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of an individual 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 cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

☞ **DISCUSSION OF THE ENVIRONMENTAL EVALUATION (Attach additional sheets if necessary)**

PREPARED BY	TITLE	TELEPHONE #	DATE
Debbie Lawrence, Los Angeles Department of City Planning	Senior City Planner	(213) 978-1163	January 27, 2022

SUMMARY OF MITIGATION MEASURES, REGULATORY COMPLIANCE MEASURES, AND PROJECT DESIGN FEATURES

Aesthetics/Visual Resources

Regulatory Compliance Measures

No regulatory compliance measures are identified.

Project Design Features

No project design features are required for Aesthetics/Visual Resources

Mitigation Measures

No mitigation measures are required for Aesthetics/Visual Resources.

Agricultural and Forest Resources

Regulatory Compliance Measures

No regulatory compliance measures are identified.

Project Design Features

No Project Design Features are required for Agricultural and Forest Resources.

Mitigation Measures

No mitigation measures are required for Agricultural and Forest Resources.

Air Quality

Regulatory Compliance Measures

RCM-AQ-1. Site Clearing, Grading and Construction Activities:

- Compliance with provisions of the SCAQMD District Rule 403. The project shall comply with all applicable standards of the Southern California Air Quality Management District, including the following provisions of District Rule 403:
  - All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.
  - The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.

- All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust.
- All dirt/soil loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.
- All dirt/soil materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.
- General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.
- Trucks having no current hauling activity shall not idle but be turned off.

RCM-AQ-2. In accordance with Sections 2485 in Title 13 of the California Code of Regulations, the idling of all diesel fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location**.**

RCM-AQ-3. In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards.

Project Design Features

PDF-AQ-1: The following measure will be employed by the project to minimize construction-related emissions:

- The project shall obtain concrete for use during the concrete-pour phase of construction from local concrete suppliers located within a 7-mile radius of the project site.

Mitigation Measures

No mitigation measures are required for Air Quality.

Biological Resources

Regulatory Compliance Measures

RCM-BIO-1: Tree Removal (Public Right-of-Way). Removal of trees in the public right-of way requires approval by the Board of Public Works. The required Tree Report shall include the location, size, type, and condition of all existing trees in the adjacent public right-of-way and shall be submitted for review and approval by the Urban Forestry Division of the Bureau of Street Services, Department of Public Works. Per Section 62.177 of the LAMC, the Applicant shall pay an in-lieu tree replacement fee for any trees removed in the public right-of-way that cannot be replaced on site.

RCM-BIO-2: Proposed project activities (including disturbances to native and non-native vegetation, structures and substrates) should take place outside of the breeding bird season which generally runs from March 1- August 31 (as early as February 1 for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture of kill (Fish and Game Code Section 86).

If project activities cannot feasibly avoid the breeding bird season, beginning thirty days prior to

the disturbance of suitable nesting habitat, the applicant shall:

- Arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within 300 feet of the construction work area (within 500 feet for raptors) as access to adjacent areas allows. The surveys shall be conducted by a Qualified Biologist with experience in conducting breeding bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of clearance/construction work.
- If a protected native bird is found, the applicant shall delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species (within 500 feet for suitable raptor nesting habitat) until August 31.
- Alternatively, the Qualified Biologist could continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest (within 500 feet for raptor nests) or as determined by an qualified biological monitor, shall be postponed until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. The buffer zone from the nest shall be established in the field with flagging and stakes. Construction personnel shall be instructed on the sensitivity of the area.
- The Applicant shall record the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds. Such record shall be submitted and received into the case file for the associated discretionary action permitting the project.

Project Design Features

No Project Design Features are proposed for Biological Resources.

Mitigation Measures

No mitigation measures are required for Biological Resources.

Cultural Resources

Regulatory Compliance Measures

RCM-CR-1. In the event that cultural resources (sites, features, artifacts, or fossilized material) are exposed during construction activities for the project, all construction work occurring in the vicinity of the find shall immediately stop until a qualified specialist, meeting the Secretary of the Interior's Professional Qualification Standards, can evaluate the significance of the find and determine whether additional study is warranted. Depending upon the significance and nature of the find under CEQA (14 CCR 15064.5(f); PRC Section 21082), the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan, testing or data recovery may be warranted.

RCM-CR-2. If human remains are encountered unexpectedly during construction demolition and/or grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code (PRC) Section 5097.98. In the event that human remains are discovered during excavation activities, the following procedure shall be observed:

- Stop immediately and contact the County Coroner:

  1104 N. Mission Road
  Los Angeles, CA 90033
  323) 343-0512 (8 a.m. to 5 p.m. Monday through Friday) or
  (323) 343-0714 (After Hours, Saturday, Sunday, and Holidays)

- If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC).
- The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American.
- The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.
- If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.

Project Design Features

No Project Design Features are proposed for Cultural Resources.

Mitigation Measures

No mitigation measures are required for Cultural Resources.

Energy

Regulatory Compliance Measures

No regulatory compliance measures are identified.

Project Design Features

No Project Design Features are proposed for Energy.

Mitigation Measures

No Mitigation Measures are proposed for Energy.

Geology and Soils

Regulatory Compliance Measures

RCM GEO-1: A final, design level, geotechnical, geologic and seismic hazard investigation report that complies with all applicable state and local code requirements shall be prepared by a California-registered geotechnical engineer and shall be submitted to the LADBS. The final geotechnical, geologic and seismic hazard investigation report would specify exact design coefficients, as well as the type and sizing of structural building materials, site preparation requirements, and foundation design requirements; and demonstrate that construction procedures would meet the established performance standards.

The site-specific geotechnical report shall be prepared to the written satisfaction of LADBS and shall address each of the recommendations identified in the Preliminary Site Geotechnical and Geologic Assessment Report for Proposed 40-Story High-Rise Mixed-Use Development Project 1101-1115 S. Hill Street and 206-210 W. 11th Street, Los Angeles, California, prepared by AECOM, dated August 16, 2021.

RCM GEO-2: The proposed tower would be designed using the Los Angeles Tall Buildings Structural Design Council 2001 edition, "An Alternative Procedure for Seismic Analysis and Design of Tall Buildings Located in the Los Angeles Region." With this design approach, a site-specific ground motion based on the latest seismic design standard would be developed for the project's structural design**.**

Project Design Features

PDF GEO-1: The project shall provide corrosion protection for metals in areas where corrosive groundwater or soil could potentially cause deterioration. Corrosion protection techniques could include epoxy and metallic protective coatings, the use of alternative (corrosion resistant) materials, and selection of the appropriate type of cement and water/cement ratio. The reinforced concrete mix design shall be performed following the latest Building Code regulations. Specific measures to reduce the potential effects shall be developed in the design phase to reduce impacts related to corrosive soils to low levels and shall be approved by the Los Angeles Department of Building and Safety.

Mitigation Measures

MM-GEO-1:

A qualified paleontologist shall review the paleontological records search prepared by the Los Angeles County Natural History Museum and review existing literature for the proposed project area. The following additional measures shall be designed to recover remains before they are lost or destroyed.

- All ground-disturbing activities associated with project construction occurring within previously undisturbed fossil bearing formations shall be monitored by a qualified paleontologist or qualified paleontological monitor. A qualified paleontologist is defined as an individual with an M.S. or Ph.D. in paleontology or geology who is familiar with paleontological procedures and techniques, who is knowledgeable in the geology and paleontology of Los Angeles County, and who has worked as a paleontological monitoring project supervisor in the County for at least 1 year. A paleontological monitor is defined as an individual who has experience in the collection and salvage of fossil materials, and works under the direction of a qualified paleontologist.
- A qualified paleontologist shall attend preconstruction meetings to consult with the grading and excavation contractors concerning excavation schedules, paleontological field techniques, and safety issues. In addition, all on-site construction personnel shall receive Worker Education and Awareness Program (WEAP) training prior to the commencement of excavation work.
- If fossils are discovered, the paleontologist (or paleontological monitor) shall recover them. In most cases, this fossil salvage can be completed in a short period of time; however, some

fossil specimens, such as a complete large mammal skeleton, may require an extended salvage period. In these instances, the paleontologist (or paleontological monitor) shall be allowed to temporarily direct, divert, or halt grading to allow recovery of fossil remains in a timely manner. Because of the potential for the recovering of small fossil remains, such as isolated mammal teeth, it may be necessary to set up a screen-washing operation on site.

- Fossil remains collected during the monitoring and salvage portion of the program shall be cleaned, repaired, sorted, and catalogued.
- Prepared fossils, along with copies of all pertinent field notes, photos, and maps, shall be deposited (as a donation) in a scientific institution with permanent paleontological collections, such as the NHMLAC.
- A final data recovery report shall be completed that outlines the results of the monitoring program. This report shall include discussions of the methods used, stratigraphic section(s) exposed, fossils collected, and significance of recovered fossils.

Greenhouse Gas Emissions

Regulatory Compliance Measures

RCM-GHG-1. The project must meet Title 24 2016 standards and include ENERGY STAR appliances. Energy Star-rated appliances would reduce the projects energy demand during the operational life of the multi-family dwelling units.

RCM-GHG-2. The project is subject to construction and demolition waste recycling of at least 65 percent, per Section 4.408.1 of Title 24 Part 11, California Green Building Standards Code (CALGreen). In addition, project site operations are subject to AB 939 requirements to divert 50 percent of solid waste to landfills through source reduction, recycling, and composting. Finally, the project is required by the California Solid Waste Reuse and Recycling Access Act of 1991 to provide adequate storage areas for collection and storage of recyclable waste materials.

RCM-GHG-3. As mandated by the LA Green Building Code, the project is required to provide a schedule of plumbing fixtures and fixture fittings that reduce potable water within the development by at least 20 percent. It must also provide irrigation design and controllers that are weather- or soil moisture-based and automatically adjust in response to weather conditions and plants' needs.

RCM-GHG-4. The project must comply with the electric vehicle ready and electric vehicle charging requirements set forth in Ordinance No. 186,485.

RCM-GHG-5. Greenhouse Gas Emissions (Green Building Code): In accordance with the City of Los Angeles Green Building Code (Chapter IX, Article 9, of the Los Angeles Municipal Code), the project shall comply with all applicable mandatory provisions of the Los Angeles Green Code and as it may be subsequently amended or modified.

RCM-GHG-6. The project shall comply with City Ordinance No. 184,248 (effective June 2016) amended provisions of Articles 4 and 9 of Chapter IX of the LAMC which establish citywide water efficiency standards and require water-saving systems and technologies in buildings and landscapes to conserve and reduce water usage.

Project Design Features

PDF GHG-1: No more than 50 percent of the residential units shall have an indoor fireplace installed. This measure would reduce the consumption of natural gas and associated GHG emissions

Mitigation Measures

No Mitigation Measures are proposed for Greenhouse Gas Emissions.

Hazards and Hazardous Materials

Regulatory Compliance Measures

RCM -HAZ-1. Prior to the issuance of any permit for the demolition or alteration of the existing structure(s), the applicant shall provide a letter to the Department of Building and Safety from a qualified asbestos abatement consultant indicating that no Asbestos-Containing Materials (ACM) are present in the building. If ACMs are found to be present, it shall be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other applicable State and Federal rules and regulations.

RCM-HAZ-2. Prior to issuance of demolition permits, the Project Applicant shall submit verification to the City of Los Angeles Department of Building and Safety that a lead-based paint survey has been conducted at all existing buildings located on the Project site. If lead-based paint is found, the Project Applicant shall follow all procedural requirements and regulations for proper removal and disposal of the lead-based paint.

RCM HAZ-3. Should any known, or previously undiscovered oil production wells be encountered at the project site during construction activities, the Applicant or construction manager shall halt work in the immediate area and notify DOGGR and the Los Angeles Fire Department immediately. Any encountered wells shall be abandoned or re-abandoned in accordance with the requirements of DOGGR and the Los Angeles Fire Department.

RCM-HAZ-4. The project shall provide a methane mitigation system as required by the Los Angeles Building Code Chapter 71, Methane Mitigation Standards Ordinance.

Project Design Features

No Project Design Features are proposed for Hazards and Hazardous Materials

Mitigation Measures

No mitigation measures are required for Hazards and Hazardous Materials

Hydrology and Water Quality

Regulatory Compliance Measures

RCM-HYD-1. Prior to issuance of a grading permit, the Applicant shall obtain coverage under the State Water Resources Control Board National Pollutant Discharge Elimination System General Permit for Storm Water Discharges Associated with Construction and Land Disturbance

Activities (Order No. 2009-0009-DWQ, National Pollutant Discharge Elimination System No. CAS000002) (Construction General Permit) for the project, A Storm Water Pollution Prevention Plan shall be prepared and implemented for the project in compliance with the requirements of the Construction General Permit. The Storm Water Pollution Prevention Plan shall identify construction Best Management Practices to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities.

RCM-HYD-2. Sediment carries with it other work-site pollutants such as pesticides, cleaning solvents, cement wash, asphalt, and car fluids that are toxic to sea life.

- Leaks, drips and spills shall be cleaned up immediately to prevent contaminated soil on paved surfaces that can be washed away into the storm drains.
- All vehicle/equipment maintenance, repair, and washing shall be conducted away from storm drains. All major repairs shall be conducted off-site. Drip pans or drop clothes shall be used to catch drips and spills.
- Pavement shall not be hosed down at material spills. Dry cleanup methods shall be used whenever possible. Dumpsters shall be covered and maintained. Uncovered dumpsters shall be placed under a roof or be covered with tarps or plastic sheeting.

RCM-HYD-3. Prior to the issuance of a grading permit, the project shall comply with the SUSMP and/or the Site Specific Mitigation Plan to mitigate stormwater pollution as required by Ordinance Nos. 172,176 and 173,494. The appropriate design and application of BMP devices and facilities shall be determined by the Watershed Protection Division of the Bureau of Sanitation, Department of Public Works.

RCM-HYD-4. Prior to issuance of grading permits, the Applicant shall submit a Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan to the City of Los Angeles Bureau of Sanitation Watershed Protection Division for review and approval. The Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook.

RCM-HYD-5. The Best Management Practices shall be designed to retain or treat the runoff from a storm event producing 0.75 inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater, in accordance with the Development Best Management Practices Handbook Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect confirming that the proposed Best Management Practices meet this numerical threshold standard shall be provided.

Project Design Features

No Project Design Features are proposed for Hydrology and Water Quality.

Mitigation Measures

No mitigation measures are required for Hydrology and Water Quality.

Land Use and Planning

Regulatory Compliance Measures

No regulatory compliance measures are identified.

Project Design Features

No Project Design Features are proposed for Land Use.

Mitigation Measures

No mitigation measures are required for Land Use.

Mineral Resources

Regulatory Compliance Measures

No regulatory compliance measures are identified.

Project Design Features

No Project Design Features are proposed for Mineral Resources

Mitigation Measures

No mitigation measures are required for Mineral Resources

Noise and Vibration

Regulatory Compliance Measures

No regulatory compliance measures are identified.

Project Design Features

PDF-NOI-1: Each mechanical room shall be outfitted with sound attenuation measures to further minimize noise levels at neighboring properties in accordance with Section 112.02 of the LAMC, which prohibits noise from mechanical equipment from exceeding the ambient noise level on the premises of other occupied properties by more than 5 dBA.

PDF-NOI-2: The mechanical room at the ground-floor level of the Project building adjacent to the alleyway housing the emergency generators shall be designed with sufficient noise attenuation features (e.g., silencers, generator enclosures, insulation, etc.) to provide compliance with Section 112.02 of the LAMC, which prohibits noise from mechanical equipment from exceeding the ambient noise level on the premises of other occupied properties by more than 5 dBA.

Mitigation Measures

MM NOI-1: The following measures shall be employed during project construction to reduce short-term noise levels at nearby noise-sensitive residential receptors:

a) An 8-foot-high temporary barrier with a minimum sound transmission (STC) rating of 26, shall be erected along eastern and southern side of the project site boundary. The barrier will start at the northern extent of the construction site at the intersection of 11th Street and S. Hill Street and shall continue to the southern terminus of the construction site where it will turn perpendicular to the construction site and continue until the western terminus of the project site at the alley way west of the project site. This barrier shall be constructed in one of the following ways:

   - From acoustical blankets hung over or from a supporting frame. The blankets shall be firmly secured to the framework. The blankets shall be overlapped by at least 4 inches at seams and taped and/or closed with hook-and-loop fasteners (i.e., Velcro®) so that no gaps exist. The largest blankets available shall be used in order to minimize the number of seams. The blankets shall be draped to the ground to eliminate any gaps at the base of the barrier.
   - From commercially available acoustical panels lined with sound-absorbing material (the sound-absorptive faces of the panels should face the construction equipment).
   - From common construction materials such as plywood provided that the barrier is designed with overlapping material at the seams to assure that no gaps exist between the panels.

b) On-site vehicle speeds shall be limited to 15 miles per hour or less (except in cases of emergency).

c) Construction-related truck traffic shall be routed away from noise-sensitive areas to the extent feasible.

d) All construction equipment shall be properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded.

e) Pneumatic tools used at the site shall be equipped with an exhaust muffler on the compressed air exhaust to minimize noise levels.

f) Stationary noise sources shall be located as far from adjacent sensitive receptors as possible and shall be muffled and enclosed within temporary sheds or insulated barriers.

g) Back-up beepers for all construction equipment and vehicles shall be broadband sound alarms or adjusted to the lowest noise levels possible, provided that Occupational Safety and Health Administration (OSHA) and California OSHA safety requirements are not violated. On vehicles where back-up beepers are not available, alternative safety measures such as escorts and spotters will be employed.

h) A designated website shall be set up during project construction that provides the public with information about the project and its construction schedule as well as opportunities for the public to submit questions on the project.

i) Prior to commencement of construction a designated project contact person shall directly notify the management of any surrounding residential properties located within 100 feet of the project site about the construction schedule and activities and provide a contact number to address any noise-related complaints during construction.

j) The construction management company's name and telephone number(s) shall be posted at a least one location along each street frontage that borders the project site.

k) A designated point of contact shall be identified to address noise-related complaints during construction. The noise disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., starting too early, bad muffler) and will be required to implement reasonable measures such that the complaint is resolved.

MM NOI-2: A Board of Police Commissioners Permit in accordance with the provisions in LAMC Section 41.40 shall be obtained by the project construction contractor to allow for a continuous concrete pour at the project site during hours outside of the period between 7:00 a.m. and 9:00 p.m.

Population and Housing

Regulatory Compliance Measures

No regulatory compliance measures are identified.

Project Design Features

No Project Design Features are proposed for Population and Housing.

Mitigation Measures

No mitigation measures are required for Population and Housing.

Public Services

Regulatory Compliance Measures

RCM-PS-1. The Applicant shall pay school fees to the Los Angeles Unified School District to offset the impact of additional student enrollment at schools serving the project area.

RCM-PU-1. Prior to issuance of grading permits, the Applicant shall submit a Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan to the City of Los Angeles Bureau of Sanitation Watershed Protection Division for review and approval. The Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook.

RCM-PU-2. The project shall comply with Ordinance No. 170,978 (Water Management Ordinance), which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the

cooler months and during the rainy season).

RCM-PU-3. In compliance with LAMC Section 66.32.1, the Project shall incorporate the following:

- Prior to the issuance of any demolition or construction permit, the Applicant shall provide a copy of the receipt or contract from a waste disposal company providing services to the project, specifying recycled waste service(s), to the satisfaction of the Department of Building and Safety. The demolition and construction contractor(s) shall only contract for waste disposal services with a company that recycles demolition and/or construction-related wastes.
- To facilitate on-site separation and recycling of demolition- and construction related wastes, the contractor(s) shall provide temporary waste separation bins on-site during demolition and construction. These bins shall be emptied and the contents recycled accordingly as a part of the project's regular solid waste disposal program.

Project Design Features

PDF-PS-1: A construction fence shall be constructed around the project site to minimize trespassing, vandalism, short-cut attractions and attractive nuisances.

PDF-PS-2: Prior to the occupancy of the project, the Applicant shall provide the Central Area Commanding Officer with a diagram of each portion of the property, including access routes, and additional information to facilitate potential LAPD responses.

PDF PS-3: The project would incorporate security measures for the safety of residents, TORS guests, employees, and visitors to the project site. During operation of the project, traffic access to the residential parking areas from South Hill Street would be controlled and access to the lower levels would be remain open for commercial and TORs unit parking. Access to parking via the alley entrance would be controlled though gated entries outside of business hours and the entry areas would be well illuminated. Site security would include controlled keycard access to residential and TORs unit areas, parking areas, patrolled security for TORs unit areas, secured entry and exit points to all buildings, alarmed systems for commercial areas, and security lighting within common areas and entryways, and closed-circuit TV monitoring (CCTV).

Parks and Recreation

Regulatory Compliance Measures

No regulatory compliance measures are identified.

Project Design Features

No Project Design Features are proposed for Parks and Recreation.

Mitigation Measures

No mitigation measures are required for Parks and Recreation.

Transportation

Regulatory Compliance Measures

No regulatory compliance measures are identified.

Project Design Features

PDF TRAF-1: The Applicant shall prepare a detailed Construction Management Plan that shall include, but not be limited to, the following elements, as appropriate:

- Provide off-site truck staging in a legal area furnished by the construction truck contractor.
- Schedule deliveries and pick-ups of construction materials during non-peak travel periods to the extent possible and coordinate to reduce the potential of trucks waiting to load or unload for protracted periods.
- As parking, travel lane, and/or sidewalk closures are anticipated, worksite traffic control plan(s), approved by the City of Los Angeles, should be implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures.
- Determine with the City the number and location of flag men required to reroute traffic and accommodate deliveries as needed.
- Establish requirements for loading/unloading and storage of materials on the project site, where parking spaces would be encumbered, length of time traffic travel lanes can be encumbered, sidewalk closings or pedestrian diversions to ensure the safety of the pedestrian and access to local businesses and residences.
- Ensure that access will remain unobstructed for land uses in proximity to the project site during project construction.
- Coordinate with the City and emergency service providers to ensure adequate access is maintained to the project site and neighboring businesses, residences, and other ongoing projects such as the downtown LA Streetcar.
- Construction notices/hotline will be posted at several locations on the project site.

Mitigation Measures

No mitigation measures are required for Transportation.

Tribal Cultural Resources

Regulatory Compliance Measures

No regulatory compliance measures are identified.

Project Design Features

No project design features are required for Tribal Cultural Resources

Mitigation Measures

No mitigation measures are required for Tribal Cultural Resources

Utilities and Service Systems

Regulatory Compliance Measures

RCM-PU-1. Prior to issuance of grading permits, the Applicant shall submit a Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan to the City of Los Angeles Bureau of Sanitation Watershed Protection Division for review and approval. The Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook.

RCM-PU-2. The project shall comply with Ordinance No. 170,978 (Water Management Ordinance), which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season).

RCM-PU-3. In compliance with LAMC Section 66.32.1, the Project shall incorporate the following:

- Prior to the issuance of any demolition or construction permit, the Applicant shall provide a copy of the receipt or contract from a waste disposal company providing services to the project, specifying recycled waste service(s), to the satisfaction of the Department of Building and Safety. The demolition and construction contractor(s) shall only contract for waste disposal services with a company that recycles demolition and/or construction-related wastes.
- To facilitate on-site separation and recycling of demolition- and construction related wastes, the contractor(s) shall provide temporary waste separation bins on-site during demolition and construction. These bins shall be emptied and the contents recycled accordingly as a part of the project's regular solid waste disposal program.

Project Design Features

No project design features are required for Public Services

Mitigation Measures

No mitigation measures are required for Public Services

Wildfire

Regulatory Compliance Measures

No regulatory compliance measures are identified0

Project Design Features

No project design features are required for Wildfire

Mitigation Measures

No mitigation measures are required for Wildfire

SECTION 6

Sustainable Communities Environmental Analysis

The following discussion provides responses to each of the questions set forth in the City of Los Angeles Initial Study Checklist as adjusted for use as a Sustainable Communities Environmental Assessment (SCEA) pursuant to Public Resources Code (PRC) Section 21155.2(b). This analysis assumes all applicable mitigation measures (MMs) from the Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) are incorporated. Where applicable, project specific project design features (PDFs), regulatory compliance measures (RCMs), and/or mitigation measures (MMs) are identified in the analysis that help reduce to a level of insignificance or avoid potentially significant or significant impacts on the environment.

6.1 Aesthetics

		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 along a scenic highway?	☐	☐	☐	☒
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?	☐	☐	☒	☐
d.	Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?	☐	☐	☒	☐

On September 27, 2013, Governor Brown signed Senate Bill (SB) 743, which became effective on January 1, 2014. The purpose of SB 743 is to streamline the review under the California Environmental Quality Act (CEQA) for several categories of development projects including the development of infill projects in transit priority areas (TPAs). PRC Section 21099 (a)(7) defines a TPA as an area located within 0.5 mile (2,640 feet) 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." As defined in PRC Section 21064.3, a major transit stop is 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.[1]

PRC Section 21099(d)(1) states that a project's aesthetic impacts shall not be considered a significant impact on the environment if:

1. The project is a residential, mixed-use residential or employment center project, and

2. The project is located on an infill site within a TPA.

Further provisions of SB 743 provide that this legislation "does not affect, change, or modify the authority of a lead agency to consider aesthetic impacts pursuant to local design review ordinances or other discretionary powers provided by other laws or policies" (PRC Section 21099(d)(2)(A)), and that "aesthetic impacts do not include impacts on historical or cultural resources." Section 21099(d)(2)(B). The City of Los Angeles Zoning Information File ZI No. 2452 also notes that the limitation of aesthetic impacts pursuant to PRC Section 21099 does not include impacts to historic or cultural resources.

The project meets the above criteria as it would be a mixed-use residential, infill project located in a TPA, and as such aesthetic impacts, are considered less than significant. While Section 21099 prohibits aesthetic impacts from being considered significant environmental impacts pursuant to CEQA, it does not affect the ability of the City of Los Angeles to implement design review through its ordinances or other discretionary powers.

Except as provided in Public Resources Code Section 21099, would the project:

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

Less Than Significant Impact.

The project is located in Downtown Los Angeles. While the San Gabriel Mountains provide scenic vistas to the north and northeast of the Downtown area as do the Santa Monica/Hollywood Hills to the northwest although long range, views of these scenic vistas are largely obscured by intervening development. More specifically, the surrounding properties are developed with commercial, industrial, institutional, residential, and parking lots. As such, no impact to scenic vistas would occur. Furthermore, as discussed above, pursuant to SB 743 and ZI No. 2452, aesthetic impacts "shall not be considered significant impacts on the environment" as a matter of law.

Conclusion

Impacts would be less than significant and no mitigation measures are required.

[1] The City of Los Angeles defines Peak Periods to be between 6:00 to 9:00 a.m. and 3:00 to 7:00 p.m. https://planning.lacity.org/ordinances/docs/toc/TOCGuidelines.pdf.

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

No Impact. The project is located within a dense, urban setting. State scenic highways are regulated by the California Department of Transportation under the California Scenic Highway Program. There are no state-designated scenic highways in the vicinity of the project site. The nearest state-designated scenic highway, State Route 27, is located within the Palisades Highlands community and is over 18 miles west of the project site. A portion of the Arroyo Seco Parkway is a National Civil Engineering Landmark, a National Scenic Byway, and one of two California Historic Parkways and is located over a mile northeast of the project site[2]. Furthermore, as discussed above, pursuant to SB 743 and ZI No. 2452, aesthetic impacts "shall not be considered significant impacts on the environment" as a matter of law.

Conclusion

As the project is not located within the vicinity of a state-designated scenic highway, the project would have no impact to existing scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural features within a state-designated scenic highway.

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 a publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less Than Significant Impact.

The project site is currently developed with a vacant warehouse building. The project is located in a highly urbanized area in the City of Los Angeles; therefore, the applicable threshold with respect to the project is consistency with applicable zoning and other regulations governing scenic quality.

The project site would not conflict with applicable zoning and regulations that govern scenic quality. As discussed further in Section 6.11, *Land Use and Planning*, the project would be consistent with the applicable design related policies with the *General Plan Framework Element*, *Central City Community Plan*, and the *Downtown Design Guide (DDG)*. The DDG supplements LAMC provisions and applies to all projects within its boundaries. The DDG contains standards and guidelines for sustainable design, sidewalks and setbacks, ground-floor treatment, parking and access, massing and street wall, on-site open space, architectural detail, streetscape improvement and signage prepared at a finer grain specifically for the Downtown neighborhood districts. As discussed in Section 6.11, design of the project would contribute to, and enhance, the pedestrian,

[2] Caltrans, California Scenic Highway Map, Accessed December 25, 2021, https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa

and architectural fabric of the Downtown South Park area. Specifically, the project would remove an existing warehouse building that has been vacant since approximately 2013. The project would develop a new mixed-use building that would enhance the existing project site. The design composition emphasizes pedestrian-scale features such as landscaping, an architectural awning, and ground-floor commercial/restaurant uses. The awning would serve as a prominent architectural feature of the overall design that will provide shade and engage pedestrians at the street level. Above the awning, vertical timber-like beams would seamlessly extend vertically to screen auto parking on levels three and four. Integrated with the beams, layers of opaque glazing, vertical fins, and landscaping would extend upwards, effectively screening views of vehicles and storage areas from either of the building's façades along South Hill Street and West 11th Street.

The residential lobby, TORS lobby, and two restaurant spaces along South Hill Street and West 11th Street would feature large glass storefronts, distinctive residential and commercial entrances, paving treatments, seating, street trees, and landscaping along both sidewalks. In addition, the project would be required to include one tree for every four dwelling units, totaling 120 trees planted on-site.

These design features would be consistent with the intent of the applicable regulations governing scenic quality contained in the *General Plan Framework Element, Central City Community Plan*, and the *DDG* which govern the project site.

The project site is zoned C2-4D-O and is designated with the Regional Center Commercial land use designation in the Central City Community Plan. There is no height or story limit for the project site. The height of the project (520 feet above ground level) would be consistent with the dense urban environment that characterizes the South Park area. The surrounding buildings vary in height, with mid- rise and high-rise buildings. Within 500 feet of the project site, there are several existing developments with comparable size, scale and uses, including the 25-story TEN50 luxury condo building located at 1050 S. Grand Avenue, and the 37-story Aven Apartments located at 1120 S. Grand Avenue, and the 32-story USC Tower providing high-rise office uses southeast of the project. The physical characteristics of the site and proposed density of development are consistent with the existing and urban character of the surrounding South Park area.

As the project has been designed with a unified architectural aesthetic and would promote the pedestrian experience through a new streetscape design that would substantially increase landscape amenities, including the provision of ground-level commercial uses and landscaping, that would be consistent with applicable policies governing scenic quality, the project would not conflict with applicable zoning or other regulations governing scenic quality and impacts would be less than significant.

Furthermore, as discussed above, pursuant to SB 743 and ZI No. 2452, aesthetic impacts "shall not be considered significant impacts on the environment" as a matter of law.

Conclusion

The project would be consistent with applicable zoning and other regulations governing scenic quality. Project impacts would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. The project site is located in a highly urbanized area that is characterized by high ambient light levels from street-front commercial uses, streetlights, architectural and security lighting, indoor building illumination, and vehicle lights along adjacent roadways. The project would include appropriate levels of interior and exterior lighting for security, parking, and architectural highlighting. Outdoor lighting would be designed and installed with shielding, such that lighting would be directed and focused on the project in accordance with LAMC lighting regulations that require that operational lighting would be directed downward or on the specific on-site feature to be lit and avoid direct glare onto exterior glazed windows or glass doors of existing and adjacent uses. Proposed signage and outdoor lighting would be subject to applicable regulations contained within the LAMC. Most notably, LAMC Section 93.0117(b) limits lighting intensity or direct glare onto exterior glazed windows or glass doors on any property containing residential units; elevated habitable porch, deck, or balcony on any property containing TORS units or residential condominium units; or any ground surface intended for uses such as recreation, barbecue or lawn areas or any other property containing a residential unit or units.

Furthermore, given the degree of ambient lighting that currently exists in the project area, the proposed lighting would not substantially alter ambient night light. In accordance with City requirements, the exterior of the proposed structure would use materials such as high-performance and/or low-reflective glass (no mirror-like tints or films) and pre-cast concrete or fabricated wall surfaces that would minimize glare and reflected heat. Based on the above, light and glare impacts are not expected to be substantial or to adversely affect cultural resources. Therefore, glare impacts are considered less than significant.

Furthermore, as discussed above, pursuant to SB 743 and ZI No. 2452, aesthetic impacts "shall not be considered significant impacts on the environment" as a matter of law.

Conclusion

The project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area as it relates to cultural resources. Project impacts would be less than significant. No mitigation measures are required.

Cumulative Impacts: Aesthetics

As discussed above, the project site is not located within or near a State Scenic Highway. The project would not have any direct adverse impacts on a scenic resource; and therefore, would not cumulatively contribute to the effects of related projects on scenic resources within a State Scenic Highway that might occur independently of the project. New development subject to discretionary approval would need to demonstrate conformance with the City's design standards, and it is therefore anticipated that new development would reflect high quality design and would be in compliance with existing zoning and design regulations and cumulative impacts would be less than significant.

Cumulative light and glare effects would be consistent with the existing urban environment, which is characterized by high ambient light levels. Because lighting, including illuminated signage and outdoor lighting would be subject to regulations contained within the LAMC, compliance would ensure that impacts regarding lighting for the project and the related projects would not significantly impact sensitive uses. Accordingly, the project's contribution to impacts would not be cumulatively considerable and cumulative impacts would be less than significant. To the extent an individual cumulative project might incorporate highly reflective materials and cause local glare effects, the project would not contribute to a combined effect as project materials are of a type that would not generate a meaningful amount of reflective glare.

Moreover, as mentioned above, Public Resources Code Section 21099 provides that the aesthetic impacts of a mixed-use project, such as the project, upon an infill site within a transit priority area shall not be considered significant impacts on the environment. Therefore, cumulative aesthetic impacts would be less than significant. Under SB 743 and ZI No. 2452, aesthetic impacts of the project shall not be considered a significant impact on the environment.

Conclusion

Cumulative impacts would be less than significant and no mitigation measures are required.

6.2 Agricultural and Forestry Resources

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
In determining whether impacts on 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 on 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 the Forest Protocols adopted by the California Air Resources Board. Would the project:					
a.	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b.	Conflict with existing zoning for agricultural use or conflict with 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 that, 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?	☐	☐	☐	☒

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 (CARB).

Would the project:

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

No Impact. The project site is located within a highly urbanized area and is currently developed with a 2-story warehouse building. No agricultural uses, or related farmland operations, are present

within the project site or surrounding area. The project site is not located on designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program.[3] The urban character of the project site would be consistent with the Farmland Mapping and Monitoring Program's definition of "Urban and Built-Up Land," which does not constitute farmland. Therefore, the project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses.

Conclusion

The project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses. No impact would occur, and no mitigation measures are required.

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

No Impact. The Williamson Act of 1965 allows local governments to enter into contract agreements with local landowners with the purpose of trying to limit specific parcels of land to agricultural or other related open space use. The project site is not zoned for agricultural uses presently and would not be rezoned to permit agricultural uses and is not subject to a Williamson Act contract.

Conclusion

The project would not conflict with any zoning for agricultural uses or a Williamson Act Contract and, thus, no impacts would occur. No mitigation measures are required.

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

No Impact. The project site is currently developed with a 2-story warehouse building and is not zoned for forestry or timberland uses. The project site is within the City of Los Angeles Central City Community Plan and is designated as Regional Center Commercial, which corresponds to the property's current zoning of C2-4D-O (Commercial, Height District 4 with Development "D" Limitation, Oil Drilling Supplemental Use District). Thus, the project would not conflict with forest land or timberland zoning or result in the loss of forest land or conversion of forest land or timberland to non-forest uses. Therefore, no impact would occur, and no mitigation measures would be required

[3] State of California Department of Conservation, California Important Farmland Finder, https://maps.conservation.ca.gov/dlrp/ciff/, Accessed March 26, 2020.

Conclusion

The project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland zoning and no impact would occur, and no mitigation measures would be required.

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

No Impact. No Impact. The project site does not contain farmland, forest land, or timberland. Accordingly, the project would not result in the conversion of farmland to non-agricultural uses or forest land to non-forest uses. Therefore, no impacts would occur, and no mitigation measures would be required.

Conclusion

No forest uses are located on the project site or within the area. Therefore, no impacts would occur, and no mitigation measures would be required.

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

No Impact. The project site does not contain farmland, forest land, or timberland. Accordingly, the project would not result in the conversion of farmland to non-agricultural uses or forest land to non-forest uses. No mitigation measures would be required.

Conclusion

The project site does not contain farmland, forest land, or timberland. No impacts would occur, and no mitigation measures would be required.

Cumulative Impacts: Agricultural and Forestry Resources

As with the project, the related projects are located within a developed, urbanized area of the City of Los Angeles generally zoned for commercial and residential uses and their project sites do not support existing farming, agricultural or forest-related operations. Therefore, development of the related projects together with the project would not result in the conversion of State-designated agricultural land from an agricultural use to a non-agricultural use or result in the loss of forest land or the conversion of forest land to non-forest use.

Conclusion

No cumulative impacts on agriculture and forest resources would occur and no mitigation measures would be required.

6.3 Air Quality

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:					
a.	Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b.	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is a nonattainment area for 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?	☐	☐	☒	☐

The analysis is based on the information provided in the project-specific Air Quality and Greenhouse Gas Technical Report contained in Appendix A.

Where available and applicable, the significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations. Would the project:

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

Less Than Significant Impact. The project site is located within the South Coast Air Basin (Basin). Air quality planning for the Basin is under the jurisdiction of the SCAQMD. The air quality plans applicable to the project site are the SCAQMD's 2016 Air Quality Management Plan (AQMP), the City of Los Angeles General Plan Air Quality Element, and the 2020-2045 RTP/SCS.

2016 Air Quality Management Plan

The 2016 AQMP was adopted by the SCAQMD as a program to lead the Basin into compliance with criteria pollutant standards and other federal requirements for which the Basin is not in compliance. The AQMP relies on emissions forecasts based on the demographic and economic growth projections provided by the SCAG 2016 RTP/SCS.[4] SCAG is charged by California law to prepare and approve "the portions of each AQMP relating to demographic projections and integrated regional land use, housing, employment, and transportation programs, measures and strategies".[5] A project is considered to be consistent with the AQMP and not obstruct its implementation if, in part, it is consistent with the demographic and economic growth projections

[4] SCAQMD. 2017. Final 2016 Air Quality Management Plan. March. Available: http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15. Accessed: July 19, 2021.

[5] Ibid.

used in the formulation of the AQMP. The SCAQMD recommends that, when determining whether a project is consistent with the current AQMP, a lead agency must assess the following two criteria: (1) whether the project would directly obstruct implementation of the plan through an increase in the frequency or severity of existing air quality violations, or cause or contribute to, new violations, or delay timely attainment of air quality standards, and (2) whether it is consistent with the demographic and economic assumptions (typically land use related, such as resultant employment or residential units) upon which the plan is based.[6]

Criterion No. 1

As discussed below under Section 6.3b, the project would not obstruct implementation of the AQMP because emissions resulting from its construction and operation would not exceed SCAQMD's regional mass emissions thresholds and localized significance thresholds (LSTs) (refer to Tables 6-3, 6-4, 6-5, and 6-6). The project's emissions would therefore not increase concentrations of criteria pollutants or their precursors in a manner that could obstruct SCAQMD's efforts to achieve timely attainment of ambient air quality standards for any criteria pollutant for which it is currently not in attainment, or jeopardize the current attainment status of the Basin for other criteria pollutants.

Criterion No. 2

The project is also consistent with the AQMP in that the project has incorporated control strategies set forth in the AQMP for achieving Basin-wide emission reduction goals and the project is consistent with the demographic and economic assumptions upon which the plan is based. The following sections provide a discussion of the project's incorporation of emission control measures and the project's consistency with demographic and economic assumptions used in development of the AQMP.

Emission Control Measures

During the construction period, the project would require contractors to adhere to CARB's on-road vehicle and off-road equipment requirements, which would limit the level of construction emissions caused by the project. The project would also be required to comply with SCAQMD Rule 403 (Fugitive Dust) for controlling dust emissions. The project would water exposed (unpaved) areas three times per day, secure loads by trimming and watering or covering to prevent the spilling or blowing of the earth material, construction personnel shall clean all trucks and loads at the export site to prevent the blowing of dirt and spilling of loose earth loads, and signage would be posted at a readily visible location that identifies the construction manager and a telephone number for any inquiries or complaints from residents regarding construction activities and that complaints would be addressed within 24 hours.[7] Additionally, as part of the project the following PDF would be implemented:

[6] South Coast Air Quality Management District (SCAQMD). 1993. *CEQA Air Quality Handbook.* November.
[7] SCAQMD. 2005. Rule 403, Fugitive Dust.

PDF-AQ-1: The following measure will be employed by the project to minimize construction-related emissions:

- The project shall obtain concrete for use during the concrete-pour phase of construction from local concrete suppliers located within a 7-mile radius of the project site.

Implementation of PDF-AQ-1 would limit the level of construction emissions generated by concrete trucks used during concrete pouring activities. In addition, the project would be required pursuant to state law to use contractors that are in compliance with the CARB Air Toxic Control Measure that limits heavy duty diesel motor vehicle idling to no more than five minutes at any given location.[8] The project contractor(s) would also be required by state regulations to comply with the fleet on-road heavy duty vehicle emissions standards consistent with Measure MOB-08 from the 2016 AQMP.[9,10] These control strategies are intended to reduce emissions from on-road and off-road heavy-duty vehicles and equipment, and are implemented by accelerating the replacement of older engines that produce higher pollutant emissions with newer engines that produce lower pollutant. The project would comply with regulatory requirements to minimize short-term emissions from on-road and off-road diesel vehicles and equipment, and control fugitive dust in accordance with SCAQMD Rule 403. Additionally, PDF-AQ-1 would reduce emissions related to concrete trucks. Compliance with these measures and requirements is consistent with the AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities.

The AQMP includes transportation control measures that are intended to reduce regional mobile source emissions. Although much of the planned improvements in air quality identified in the AQMP are implemented at scales greater than at the project level (i.e., vehicle emissions standards), the project's location, design, and land use would support a reduction in vehicle trips by increasing residential density in an urbanized area near public transit. For vehicle trips to and from the project site, the project would provide 131 Electric Vehicle Ready Parking Spaces including 44 Electric Vehicle Charging Stations These project elements would reduce emission associated with vehicle use.

The project would be consistent with the existing zoning of the site, which is C2-4D-O (Commercial, Height District 4 with Development "D" Limitation, Oil Drilling Supplemental Use District) and the General Plan Designation Of Regional Center Commercial. As no Zone Change or General Plan Amendment would be required for the project, the project is consistent with land use assumptions used in development of the AQMP.

[8] The Air Toxic Control Measure (13 CCR Section 2485) specifies measures to reduce public exposure to diesel particulate matter and other air contaminants by establishing idling restrictions, emission standards, and other requirements for heavy-duty diesel engines and alternative idle-reduction technologies to limit the idling of diesel-fueled commercial motor vehicles.

[9] SCAQMD. 2017. Final 2016 Air Quality Management Plan. March. Available: http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15. Accessed: July 19, 2021.

[10] MOB-08: Accelerated Retirement of Older On-Road Heavy-Duty Vehicles [NOx, PM]

The project proposes increased density on an urban infill site by locating residential, TORS units, and commercial uses in an identified Transit Priority Area (TPA) that is in close proximity to multiple bus stops with high frequency transit service, including buses operated by Metro, LADOT (DASH and Commuter Express), and other municipal transit agencies. The project site is also just over ¼-mile from the existing Metro A (Blue) Line and Metro E (Expo) Line and is adjacent to the planned Los Angeles Streetcar route, which would operate on 11th Street.

The project would also provide up to 347 bicycle parking spaces (up to 56 short-term and 291 long-term) pursuant to the LAMC, which would encourage non-motorized transportation trips. Furthermore, as a mixed-use development that is located within walking distance of a variety of land uses in the area (including residential, office, commercial, industrial, school, and service uses), and multiple transit options, the project would also encourage pedestrian travel and reduce vehicle trips and related emissions. Thus, because the project's location, design, and land use would reduce vehicle trips, VMT, and associated emissions, the project would be consistent with the mobile emission reduction goals of the AQMP.

Demographic and Economic Projections

Long-term operation of the project would involve the employment of an estimated 159 workers for the new TORS units and commercial uses at the project site (see Section 6.14, *Population and Housing*); these workers are expected to be drawn from the regional labor pool and result in, at most, only minimal population growth with respect to SCAG employment projections.[11] Thus, employment associated with project operation would not conflict with the long-term employment projections used in the preparation of the AQMP due to the small number of employees that would be required for project operation. The project would generate short-term construction jobs, but these workers are expected to be drawn from a regional pool of construction workers who travel among construction sites as individual projects are completed. Moreover, these jobs would be relatively small in number and temporary in nature. Therefore, the project's construction jobs would not conflict with the long-term employment projections upon which the AQMP is based because such jobs would be relatively small in number and primarily drawn from the existing regional employment pool.

The project is anticipated to be operational in 2026. The project-related resident population growth is estimated to be approximately 900 residents (see Section 6.14, *Population and Housing*). SCAG's 2016-2040 RTP/SCS estimated population in the City of Los Angeles would increase from 4,063,757 persons in 2020 to 4,609,400 persons in 2040, an increase of 545,643.[12] Based on the project's occupancy year of 2026, the City of Los Angeles is anticipated to have a population of approximately 4,227,450 persons, an increase of 163,693 persons from 2020 and the project's 900 residents would represent less than 1 percent of the population growth. Furthermore, SCAG's most recent plan, the 2020-2045 RTP/SCS, estimated population in the City of Los Angeles would

[11] In the growth projections provided by the SCAG 2016 RTP/SCS, which the 2016 AQMP relies on for its emissions forecast, SCAG projects employment in Los Angeles County alone would rise from 4.2 million in 2012 to 5.2 million in 2040 (SCAG 2016).

[12] SCAG. 2016. Final 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy. Demographics and Growth Forecast Appendix. April. Available: https://scag.ca.gov/sites/main/files/file-attachments/f2016rtpscs_demographicsgrowthforecast.pdf?1606073557. Accessed: August 11, 2021.

increase from 4,049,317 persons in 2020 to 4,609,400 persons in 2040, an increase of 545,643.[13] Based on the project's occupancy year of 2026, the City of Los Angeles is anticipated to have a population of approximately 4,222,593 persons, an increase of 173,276 persons from 2020 and the project's 900 residents would represent less than 1 percent of the population growth.

The project's estimated 900 residents would be within and would comprise less than 1 percent of SCAG's estimated 2026 population growth. The project's contribution to population growth would be consistent with forecasts from the 2016 RTP/SCS for which the AQMP is based on, as well as the 2020-2045 RTP/SCS which is the most recent version of SCAG's forecasts. Furthermore, the project's growth is consistent with the 2020-2045 RTP/SCS goal of encouraging the "development of diverse housing types in areas that are supported by multiple transportation options".[14] The 2020-2045 RTP/SCS also seeks to implement "land use and growth strategies recognize local input, promote sustainable transportation options, and support equitable and adaptable communities".[15] The project's proximity to public transit allows the project's projected growth to be accommodated by existing and future transit options. Additionally, the project is located in an urban infill location that is within walking distance to a variety of land uses that include office, commercial, school, and business service uses. As such, the project's location and land use would reduce reliance on automobiles.

The population and employment growth resulting from the project would be consistent with SCAG's regional forecast projections and, in turn, consistent with the growth projections accounted for in SCAQMD's AQMP. Therefore, the project would not conflict with, or obstruct implementation of, the AQMP. This impact would be less than significant.

City's General Plan Air Quality Element

In addition to the project's consistency with the 2016 AQMP, the project's consistency with the applicable goals, objectives, and policies of the City's General Plan Air Quality Element is also evaluated and shown in Table 6-1 below.

[13] SCAG. 2020. Connect SoCal: The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments. Demographics and Growth Forecast Technical Report. September 3. Available: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf. Accessed: August 11, 2021.

[14] SCAG. 2020. Connect SoCal: The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments. September 5. Available: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176. Accessed: July 19, 2021.

[15] Ibid.

TABLE 6-1. CONSISTENCY OF PROJECT WITH APPLICABLE GOALS, POLICIES, AND OBJECTIVES OF THE CITY'S GENERAL PLAN AIR QUALITY ELEMENT

Goal/Objective/Policy	Project Consistency Assessment
Goal 1: Good air quality and mobility in an environment of continued population growth and healthy economic structure.	**Consistent.** The project would be consistent with SCAG RTP/SCS goals and objectives under SB 375 to implement "smart growth." The project would provide residential uses and employment opportunities in proximity to job centers in Los Angeles where people can live and work and have access to convenient modes of transportation that provides options for reducing reliance on automobiles and minimizing associated air pollutant emissions. The project would meet the applicable requirements of the California Green Building Standards Code and the City of Los Angeles Green Building Code. The project would also reduce VMT as a result of its urban infill location in a TPA that is near public transportation, including multiple bus stops with high frequency transit service, such as those operated by Metro, LADOT (DASH and Commuter Express), and other municipal transit agencies, as well as the Metro A (Blue) Line and Metro E (Expo) Line and the planned Los Angeles Streetcar. The project would add new infill residential units, with convenient access to public transit, which would allow people to live near work and recreational amenities. As a result, the project would provide people with convenient mobility options and a wide range of economic/employment opportunities.
Objective 1.1: It is the objective of the City of Los Angeles to reduce air pollutants consistent with the Regional Air Quality Management Plan, increase traffic mobility, and sustain economic growth citywide.	**Consistent.** As reflected above, the project would be consistent with the SCAG growth projections that are used in preparing the AQMP. The project would occupy a location that is highly accessible by regional and local bus and rail lines. As such, the project would be supportive of the Transportation Control Measures in the AQMP related to reducing vehicle trips for employees, visitors, and residents. The project would provide infill residential and commercial uses, which would allow people to live near work and recreational amenities.
Objective 1.3: It is the objective of the City of Los Angeles to reduce particulate air pollutants emanating from unpaved areas, parking lots, and construction sites.	**Consistent.** The project would incorporate measures that would reduce particulate air pollutants from unpaved areas, parking lots, and construction sites. The project would implement required control measures for construction-related fugitive dust pursuant to SCAQMD Rule 403. The project would also comply with the applicable provisions of the CARB Air Toxics Control Measure regarding idling limitations for diesel trucks reducing exhaust DPM emissions. The project contractor(s) would also be required by state regulations to comply with the fleet on-road heavy duty vehicle emissions standards consistent with Measure MOB-08 from the AQMP. These control strategies are intended to reduce emissions from on-road and off-road heavy-duty vehicles and equipment and are implemented by accelerating the replacement of older engines that produce higher pollutant emissions with newer engines that produce lower pollutant emissions.
Policy 1.3.1: Minimize particulate emissions from construction sites.	**Consistent.** The project would incorporate measures that would reduce particulate air pollutants from construction activity as described above under Objective 1.3.
Policy 1.3.2: Minimize particulate emissions from unpaved roads and parking lots associated with vehicular traffic.	**Consistent.** The project would implement required control measures for construction-related fugitive dust pursuant to SCAQMD Rule 403, which would minimize particulate emissions from unpaved roads and parking lots associated with construction-related vehicular traffic. The project would include unpaved areas after construction.
Goal 2: Less reliance on single-occupant vehicles with fewer commute and non-work trips.	**Consistent.** The project's land use characteristics would reduce trips and VMT due to its urban infill location in a TPA that includes nearby housing, employment, office, commercial, and service uses with nearby access to multiple nearby public transportation options.
Objective 2.1: It is the objective of the City of Los Angeles to reduce work trips as a step	**Consistent.** The project is near bus lines operated by Metro, LADOT (DASH and Commuter Express), and other municipal transit agencies, as well as the Metro A (Blue) Line and Metro E (Expo)

Goal/Objective/Policy	Project Consistency Assessment
towards attaining trip reduction objectives necessary to achieve regional air quality goals.	Line and the planned Los Angeles Streetcar. The project would locate infill residential and commercial land uses in an area with access to multiple other destinations, including job centers and other commercial uses. These project characteristics would reduce trips and encourage residents to utilize alternative modes of transportation.
Policy 2.1.1: Utilize compressed work weeks and flextime, telecommuting, carpooling, vanpooling, public transit, and improve walking/bicycling related facilities in order to reduce vehicle trips and/or VMT as an employer and encourage the private sector to do the same to reduce work trips and traffic congestion.	**Consistent.** The project would be near public multiple transportation options, place housing near jobs and transit, and provide bicycle parking and pedestrian infrastructure to incentivize increased biking and walking. The project would encourage pedestrian travel by incorporating new residential and commercial uses in its mixed-use development and locating this development on a site located within walking distance of businesses in the area, as well as within close proximity to multiple transit options. Furthermore, the project would include pedestrian-friendly landscaping and design, new perimeter landscaping streetscape improvements, and street level commercial uses that would enliven the pedestrian experience. These features would reduce work trips and encourage employees to utilize alternative modes of transportation including public transportation, walking, and bicycling.
Objective 2.2: It is the objective of the City of Los Angeles to increase vehicle occupancy for non-work trips by creating disincentives for single passenger vehicles, and incentives for high occupancy vehicles.	**Consistent.** The project's location would encourage non-automotive transportation to and from the project site. The project would be located within proximity of existing public transportation and would provide on-site bicycle parking for building residents, employees, and visitors.
Policy 2.2.1: Discourage single-occupant vehicle use through a variety of measures such as market incentive strategies, mode-shift incentives, trip reduction plans and ridesharing subsidies.	**Consistent.** The project would provide parking spaces in accordance with LAMC requirements, which would encourage non-automotive travel. The project's location would encourage non-automotive transportation to and from the project site. The project would be located within proximity of existing public transportation and would provide on-site bicycle parking for building residents, employees, and visitors. The project would also incentivize carpooling through the allocation of designated parking for ride sharing vehicles.
Policy 2.2.2: Encourage multi-occupant vehicle travel and discourage single-occupant vehicle travel by instituting parking management practices.	**Consistent.** The project would include bicycle parking spaces in accordance with LAMC requirements, which would encourage non-automotive travel. The project's location would encourage non-automotive transportation to and from the project site. The project would be located within proximity of existing public transportation and would provide on-site bicycle parking for building residents, employees, and visitors. Through LAMC authorized vehicle parking reductions pursuant to a Conditional Use Permit for the TORS units and the provision of bicycle parking spaces, the project would also provide less vehicle parking than the LAMC would otherwise require, thereby discouraging single-occupant vehicle travel.
Goal 4: Minimal impact of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.	**Consistent.** The project would locate a mixed-use development in a TPA within walking distance of existing and planned transit options. The project would also provide long-term and short-term bicycle parking which would help people have more opportunities to bicycle, walk and pursue other active alternatives to driving. The project's location in an urban infill area would provide residents and visitors with shopping and dining options that are easily accessible on foot or by bicycle. The project's design and location would help to improve air quality and the well-being of people as they would have greater opportunities for pedestrian and bicycling activity and to reduce their reliance on automobiles.
Policy 4.2.2: Improve accessibility for the City's residents to places of employment, shopping centers and other establishments.	**Consistent.** The project would provide a new mixed-use development that would include residential, TORS, and commercial (including restaurant) land uses in an infill location within proximity to public transportation. The project is located an urban area surrounded by commercial, residential, restaurant, office, and service uses.

Goal/Objective/Policy	Project Consistency Assessment
Policy 4.2.3: Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.	**Consistent.** The project would be located near multiple public transportation options, place housing near jobs and transit, and provide bicycle parking and pedestrian infrastructure to incentivize increased biking and walking. The project includes bicycle parking spaces for the residential and commercial uses of the project in accordance with LAMC requirements. The project would encourage pedestrian travel by incorporating new residential and commercial uses in its mixed-use development and locating this development on a site located within walking distance of businesses in the area, as well as within close proximity to multiple transit options. Furthermore, the project would include pedestrian-friendly landscaping and design, new perimeter landscaping and streetscape improvements, and street level commercial uses that would enliven the pedestrian experience. These features would reduce work trips and encourage employees to utilize alternative modes of transportation including public transportation, walking, and bicycling. Additionally, the project would provide 131 Electric Vehicle Ready Parking Spaces including 44 Electric Vehicle Charging Stations at the project site.
Policy 4.2.5: Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.	**Consistent.** The project's mixed-use nature and its location near multiple public transportation options along with the provision of bicycle parking spaces would help reduce vehicular trips and encourage use of alternative transportation.
Goal 5: Energy efficiency through land use and transportation planning, the use of renewable resources and less polluting fuels, and the implementation of conservation measures, including passive methods such as site orientation and tree planting.	**Consistent.** The project would be required to comply with California Title 24 Building Standards Code and CALGreen Code. Energy saving and sustainable design would be incorporated throughout the project. The project would emphasize energy conservation, which would be achieved through the use of energy efficient Heating Ventilation and Air Conditioning (HVAC) and lighting systems. In addition, the project would provide 131 Electric Vehicle Ready Parking Spaces including 44 Electric Vehicle Charging Stations
Objective 5.1: It is the objective of the City of Los Angeles to increase energy efficiency of City facilities and private developments.	**Consistent.** The project would be required to comply with California Title 24 Building Standards Code, the CALGreen Code and the LAMC. Energy saving and sustainable design would be incorporated throughout the project. The project would emphasize energy conservation, which would be achieved through the use of energy efficient HVAC and lighting systems. The project would provide 131 Electric Vehicle Ready Parking Spaces, including 44 Electric Vehicle Charging Stations, and would designate 15% of the building's roof area as a solar use zone.
Policy 5.1.2: Effect a reduction in energy consumption and shift to non-polluting sources of energy in its buildings and operations.	**Consistent.** As noted previously, the project would incorporate energy saving and sustainable design throughout the project in accordance with the Title 24 Building Standards Code and CALGreen Code. The project would provide 131 Electric Vehicle Ready Parking Spaces including 44 Electric Vehicle Charging Stations at the project site.
Policy 5.1.4: Reduce energy consumption and associated air emissions by encouraging waste reduction and recycling.	**Consistent.** The project would implement a construction waste management plan to divert all mixed construction and demolition debris to City certified construction and demolition waste processors, consistent with the Los Angeles City Council approved Council File 09-3029. During operations, the project would be served by a solid waste collection and recycling service under the City's "recycLA" program, which offers recycling and organic waste recycling to businesses and large multi-family customers.
Policy 5.3.1: Support the development and use of equipment powered by electric or low-emitting fuels.	**Consistent.** As noted previously, the project would incorporate energy saving and sustainable design throughout the project in accordance with the Title 24 Building Standards Code and CALGreen Code. The project would provide 131 Electric Vehicle Ready Parking Spaces including 44 Electric Vehicle Charging Stations at the project site.

As discussed in Table 6-1, the construction and operation of the project would not conflict with or be inconsistent with applicable air quality policies of the General Plan. Thus, implementation of the project would result in a less-than-significant impact.

Conclusion

The project would not conflict with or obstruct implementation of the AQMP or the goals and objectives of the RTP/SCS. Additionally, the construction and operation of the project would not conflict with or be inconsistent with applicable air quality policies of the General Plan. Therefore, the project would not conflict with or obstruct implementation of the applicable air quality plan.

Implementation of the project would result in a less-than-significant impact. No mitigation measures would be required.

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?

Less Than Significant Impact. A significant impact may occur if a project were to make a cumulatively considerable contribution of a federal or State criteria pollutant for which the Basin is currently in non-attainment. The Basin is currently in non-attainment for ozone (federal and State standards), respirable particulate matter (PM_{10}) (State standards only) and fine particulate matter ($PM_{2.5}$) (federal and state standards). Based on SCAQMD's cumulative air quality impact methodology, SCAQMD recommends that if an individual project results in air emissions of criteria pollutants that exceed the SCAQMD's recommended daily thresholds for project-specific impacts, then it would also result in a cumulatively considerable net increase of these criteria pollutants for which the project region is in non-attainment under an applicable federal or state ambient air quality standard. Conversely, if a project's emissions do not exceed the recommended daily thresholds for project-specific impacts, its impacts would not be cumulatively considerable and would not contribute to nonattainment of applicable air quality standards in the Basin.

Criteria Pollutants

For the protection of public health and welfare, the Federal Clean Air Act requires that the U.S. Environmental Protection Agency (U.S. EPA) establish National Ambient Air Quality Standards (NAAQS) for various pollutants. These pollutants are referred to as "criteria" pollutants. Similarly, the California Clean Air Act requires CARB to set standards and designate areas as either attainment or nonattainment based on whether the California Ambient Air Quality Standards (CAAQS) have been achieved. As all criteria pollutants can have human health effects at certain concentrations, the NAAQS and CAAQS define the maximum amount of an air pollutant that can be present in ambient air without harming public health. An ambient air quality standard is generally specified as a concentration averaged over a specific time period, such as 1 hour, 8 hours, 24 hours, or 1 year. The different averaging times and concentrations are meant to protect against different exposure effects. Standards established for the protection of human health are referred to as primary standards; whereas standards established for the prevention of environmental and property damage are called secondary standards.

Air quality standards have been established for the following six criteria pollutants: ozone (O_3), lead, carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and particulate matter (PM), which consists of PM less than or equal to 10 microns in diameter (PM_{10}) and PM less than or equal to 2.5 microns in diameter ($PM_{2.5}$). Criteria air pollutants are also categorized as primary and secondary pollutants. In general, primary pollutants are directly emitted into the atmosphere, and secondary pollutants are formed by chemical reactions in the atmosphere. Of the six criteria pollutants, CO, SO_2, PM_{10}, and $PM_{2.5}$ are primary pollutants, while O_3 and NO_2 are secondary pollutants. The following provides a summary discussion of the primary and secondary criteria air pollutants of primary concern.

Ozone (O_3)

O_3, which is the main ingredient in urban smog, is not emitted directly into the air, but is created by chemical reactions between hydrocarbons (HC) and nitrogen oxides (NO_X) (both by-products of the internal combustion engine) in the presence of sunlight. Reactive organic gasses (ROG) are defined by CARB and include all HC except those exempted by CARB that contribute to smog formation, while volatile organic compounds (VOCs) are defined by the U.S. EPA and include all hydrocarbons except those exempted by the U.S. EPA. Generally speaking, ROGs and VOCs are similar but not identical, and their terms are used interchangeably. For purposes of this analysis, the term ROG is used. There are no separate ambient air quality standards for ROG.

ROG are compounds made up primarily of hydrogen and carbon atoms. Internal combustion associated with motor vehicle usage is the major source of hydrocarbons. Other sources of ROG are emissions associated with the use of paints and solvents, the application of asphalt paving, and the use of household consumer products such as aerosols.

The two major forms of NO_X are NO and NO_2. NO is a colorless, odorless gas formed from atmospheric nitrogen and oxygen when combustion takes place under high temperature and/or high pressure. NO_2 is a reddish-brown irritating gas formed by the combination of NO and oxygen. In addition to serving as an integral participant in O_3 formation, NO_X also directly acts as an acute respiratory irritant and increases susceptibility to respiratory pathogens.

O_3 poses a higher risk to those who already suffer from respiratory diseases (e.g., asthma), children, older adults, and people who are active outdoors. Exposure to O_3 at certain concentrations can make breathing more difficult, cause shortness of breath and coughing, inflame and damage the airways, aggregate lung diseases, increase the frequency of asthma attacks, and cause chronic obstructive pulmonary disease. Studies show associations between short-term O_3 exposure and non-accidental mortality, including deaths from respiratory issues. Studies also suggest long-term exposure to O_3 may increase the risk of respiratory-related deaths. The concentration of O_3 at which health effects are observed depends on an individual's sensitivity, level of exertion (i.e., breathing rate), and duration of exposure. Studies show large individual differences in the intensity of symptomatic responses, with one study finding no symptoms to the least responsive individual after a 2-hour exposure to 400 parts per billion of ozone and a 50 percent decrement in forced airway volume in the most responsive individual. Although the results vary, evidence suggest that sensitive populations (e.g., asthmatics) may be affected on days when the 8-hour maximum O_3 concentration reaches 80 parts per billion.

In addition to human health effect, ozone has been tied to crop damage, typically in the form of stunted growth, leaf discoloration, cell damage, and premature death. Ozone can also act as a corrosive and oxidant, resulting in property damage such as the degradation of rubber products and other materials.

Nitrogen Dioxide (NO_2)

NO_2 is a reddish-brown gas with a bleach-like odor. As discussed previously, both NO and NO_2 are the two major forms of NO_X. NO_2 is formed when NO reacts rapidly with the oxygen in air. NO_2 is responsible for the brownish tinge of polluted air. In the presence of sunlight, atmospheric NO_2 reacts and splits to form a NO molecule and an oxygen atom. The oxygen atom can react further to form O_3, via a complex series of chemical reactions involving hydrocarbons.

Population-based studies suggest that an increase in acute respiratory illness—including infections and respiratory symptoms in children (not infants)—is associated with long-term exposures to NO_2 at levels found in homes with gas stoves, which are higher than ambient NO_2 levels found in Southern California homes that generally have fewer or no stoves. In healthy people, increase in resistance to air flow and airway contraction is observed after short-term exposure to NO_2. Larger decreases in lung functions are observed in individuals with asthma and/or chronic obstructive pulmonary disease (e.g., chronic bronchitis, emphysema) than in healthy individuals, indicating a greater susceptibility of these sub-groups. More recent studies have found associations between NO_2 exposures and cardiopulmonary mortality, decreased lung function, respiratory symptoms and emergency room asthma visits.

Carbon Monoxide (CO)

CO is a colorless, odorless, relatively inert gas. It is a trace constituent in the unpolluted troposphere and is produced by both natural processes and human activities. In remote areas far from human habitation, CO occurs in the atmosphere at an average background concentration of 0.04 part per million (ppm), primarily as a result of natural processes such as forest fires and the oxidation of methane. Global atmospheric mixing of CO from urban and industrial sources creates higher background concentrations (up to 0.20 ppm) near urban areas. The major source of CO in urban areas is incomplete combustion of carbon-containing fuels, mainly gasoline.

Individuals with a deficient blood supply to the heart are the most susceptible to the adverse effects of CO exposure. The effects observed include earlier onset of chest pain with exercise, and electrocardiograph changes indicative of worsening oxygen supply to the heart. Inhaled CO has no direct toxic effect on the lungs but exerts its effect on tissues by interfering with oxygen transport by competing with oxygen to combine with hemoglobin present in the blood to form carboxyhemoglobin (COHb). Hence, conditions with an increased demand for oxygen supply can be adversely affected by exposure to CO. Individuals most at risk include those with diseases involving heart and blood vessels, fetuses (unborn babies), and people with chronic hypoxemia (oxygen deficiency) as seen in high altitudes. Exposure to CO at high concentrations can also cause fatigue, headaches, confusion, dizziness, and chest pain.

Particulate Matter (PM)

PM consists of finely divided solids or liquids such as soot, dust, aerosols, fumes, and mists. Two forms of fine particulates are now recognized—respirable course particles with an aerodynamic diameter of 10 micrometers or less, or PM_{10}, and respirable fine particles with an aerodynamic diameter of 2.5 micrometers or less, or $PM_{2.5}$. Particulate discharge into the atmosphere results primarily from industrial, agricultural, construction, and transportation activities. However, wind on arid landscapes also contributes substantially to local particulate loading. PM is considered both a local and a regional pollutant.

Particulate pollution can be transported over long distances and may adversely affect the human, especially for people who are naturally sensitive or susceptible to breathing problems. Numerous studies have linked PM exposure to premature death in people with preexisting heart or lung disease. Other symptoms of exposure may include nonfatal heart attacks, irregular heartbeat, aggravated asthma, decreased lung function, and increased respiratory symptoms. Depending on its composition, both PM_{10} and $PM_{2.5}$ can also affect water quality and acidity, deplete soil nutrients, damage sensitive forests and crops, affect ecosystem diversity, and contribute to acid rain.

Sulfur Dioxide (SO_2)

SO_2 is a colorless, irritating gas with a "rotten egg" smell primarily formed from the combustion of fossil fuels containing sulfur. SO_2 is considered a local pollutant because it tends to accumulate in the air locally. High concentrations of SO_2 can result in temporary breathing impairment for asthmatic children and adults who are active outdoors. Short-term exposures of asthmatic individuals to elevated SO_2 levels during moderate activity may result in breathing difficulties that can be accompanied by symptoms such as wheezing, chest tightness, or shortness of breath. Other effects that have been associated with longer-term exposures to high concentrations of SO_2, in conjunction with high levels of PM, include aggravation of existing cardiovascular disease, respiratory illness, and alterations in the lungs' defenses. SO_2 also is a major precursor to $PM_{2.5}$, which is a significant health concern and a main contributor to poor visibility (see also the discussion of health effects of PM).

Lead (Pb)

Pb in the atmosphere is present as a mixture of a number of lead compounds. Leaded gasoline and lead smelters have been the main sources of lead emitted into the air. Due to the phasing out of leaded gasoline, there was a dramatic reduction in atmospheric Pb over the past three decades. Exposure to low levels of Pb can adversely affect the development and function of the central nervous system, leading to learning disorders, distractibility, inability to follow simple commands, and lower intelligence quotient. Fetuses, infants, and children are more sensitive than others to the adverse effects of Pb exposure. In adults, increased Pb levels are associated with increased blood pressure. Pb poisoning can cause anemia, lethargy, seizures, and death. There is no evidence to suggest that there are direct effects of Pb on the respiratory system.

Short-term Project Construction Emissions

Construction associated with the project would generate criteria pollutant emissions from the following activities: demolition; site preparation; grading and excavation; construction workers

traveling to and from project site; delivering construction supplies to, and hauling debris from, the project site; fuel combustion by on-site construction equipment; and building construction, the application of architectural coatings, and paving activities. These construction activities have the potential to temporarily create emissions of dust, fumes, equipment exhaust, and other air contaminants. The amount of emissions generated on a daily basis would vary, depending on the intensity and types of construction activities occurring simultaneously. To provide the most conservative analysis, maximum daily emissions estimates, which are used to assess project impacts, are based on the day with the greatest intensity of construction activities.

For purposes of this air quality analysis, construction of the project is anticipated to commence in November 2022 and continue over an approximately 36-month period before ending in November 2025. Table 6-2 presents the construction phases and estimated durations assumed for purposes of this analysis. Actual construction timing may vary depending on market conditions at the time of construction.

TABLE 6-2. ANTICIPATED PROJECT CONSTRUCTION SCHEDULE

Phases	Start (month/date/year)	Finish (month/date/year)	Duration (work days)
Demolition	11/21/2022	1/24/2023	47
Site Preparation	3/30/2023	4/17/2023	13
Grading/Excavation	4/18/2023	6/1/2023	33
Building Foundation Concrete Pour	6/2/2023	6/2/2023	1
Building Construction	6/5/2023	11/10/2025	636
Asphalt Paving	7/30/2025	7/30/2025	1
Architectural Coatings	8/1/2024	11/10/2025	333

Construction would require demolition of the existing 2-story warehouse building at the project site followed by removal of the demolition debris. The removal of this debris is estimated to require approximately 30 haul truck trips per day during the demolition phase. Additionally, during the site preparation phase it is estimated that up to 5 haul truck trips per day would occur to remove materials from the project site. During the grading phase, an estimated 58,000 cubic yards of material would require export from the project site, requiring approximately 126 haul truck round trips per day. Aside from haul truck trips, daily vendor/delivery truck trips would also occur during each of the construction phases for the project. In particular, a one-day continuous concrete pour phase for the building foundation would require approximately 576 concrete truck round trips for that day. All of the aforementioned truck trips for project construction activities would be round trips.

As discussed previously, the project would implement PDF-AQ-1 during construction to minimize construction-related emissions. Implementation of PDF-AQ-1 would limit the level of construction emissions generated by concrete trucks used during concrete pouring activities. The modeled peak daily emissions of criteria air pollutants and ozone precursors associated with construction of the project with PDF-AQ-1 are presented in Tables 6-3. As shown therein, the maximum level of daily construction emissions generated by the project with implementation of PDF-AQ-1 would not

exceed SCAQMD's daily significance thresholds for any criteria pollutants during any of the construction phases.

TABLE 6-3. REGIONAL CRITERIA POLLUTANT CONSTRUCTION EMISSIONS WITH PDF-AQ-1

Construction Phase	Total Regional Pollutant Emissions (pounds per day)					
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
2022						
Demolition	1	21	10	< 1	3	1
2023						
Demolition	1	16	9	<1	3	1
Site Preparation	<1	5	5	<1	1	<1
Grading	1	49	14	< 1	12	4
Building Foundation Concrete Pour	5	72	36	<1	12	4
Building Construction	3	16	24	< 1	8	2
2024						
Building Construction + Architectural Coatings	12	14	25	< 1	9	2
2025						
Building Construction + Architectural Coatings + Asphalt Paving [a]	11	10	21	< 1	9	2
Maximum Daily Regional Emissions During Project Construction	12	72	36	< 1	12	4
Regional Significance Thresholds	*75*	*100*	*550*	*150*	*150*	*55*
Threshold Exceeded?	No	No	No	No	No	No

Source: Modeling output provided in Appendix A.
Note: Totals may not add exactly due to rounding.
[a] Daily emissions for 2024 assume emissions from the Building Construction and Architectural Coatings phases would overlap. Daily emissions for 2025 assume that the Building Construction, Architectural Coatings, and Asphalt Paving phases would overlap.

Long-term Project Operational Emissions

Implementation of the project would result in long-term regional emissions of criteria air pollutants and ozone precursors associated with energy sources (natural gas consumption) area sources (landscaping activities, re-applications of architectural coatings, and use of consumer products), and mobile sources. According to the Transportation Assessment (TA) prepared for the project, development of the project would result in a total net increase of 2,001 daily vehicle trips over existing baseline conditions.[16] As specified in PDF-GHG-1 (refer to Section 6.8, Greenhouse Gas Emissions), indoor fireplaces would be installed in no more than 50 percent of the units.

Table 6-4 presents the daily operational emissions generated by the project. The project site is currently unoccupied, and the operational emissions presented for the project does not take any credit for the operational emissions generated by the existing uses at the project site that would be

[16] Fehr &Peers. 2020. *1111 S Hill Street Transportation Assessment Draft*. August.

displaced by the project. As shown, the project would result in long-term regional emissions of criteria air pollutants and ozone precursors that would be below SCAQMD's applicable thresholds.

TABLE 6-4. PROPOSED PROJECT CRITERIA POLLUTANT OPERATIONAL EMISSIONS

Source	Pollutant Emissions (pounds per day)					
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Project						
Area Sources	12	6	42	<1	<1	<1
Energy Sources	<1	1	<1	<1	<1	<1
Mobile Sources	4	6	30	<1	9	2
Stationary Sources	4	33	2	<1	<1	<1
Total Operational Emissions	**21**	**46**	**74**	**<1**	**10**	**3**
Regional Significance Thresholds	*55*	*55*	*550*	*150*	*150*	*55*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod modeling output provided in Appendix A.
Note: Totals may not add exactly due to rounding.
[a] Stationary sources would be limited to two on-site, diesel-powered emergency generators. Although emissions were modeled, the generators would be reserved for emergencies and would not be used on a regular basis.

As discussed previously, SCAQMD's cumulative air quality impact methodology indicates that if an individual project results in air emissions of criteria pollutants that exceed the SCAQMD's recommended daily thresholds for project-specific impacts, then it would also result in a cumulatively considerable net increase of these criteria pollutants for which the project region is in nonattainment under an applicable federal or state ambient air quality standard. Because the project's construction (refer to Table 6-3) and operational pollutant emissions (refer to Table 6-4) would not exceed the applicable SCAQMD's regional significance thresholds, the project's emissions would not be cumulatively considerable.

Additionally, recognizing that SCAQMD's regional significance thresholds were established to achieve attainment of the NAAQS and CAAQS, which in turn define the maximum amount of an air pollutant that can be present in ambient air without harming public health, the project's contribution of pollutant emissions is not expected to result in measurable human health impacts on a regional scale.

Conclusion

The project's construction and operational impacts would be less than significant, and mitigation measures are not required.

c. Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. The term *sensitive receptors* refers to uses associated with people who are considered to be more sensitive than others to air pollutants. The reasons for greater than average sensitivity include pre-existing health problems, proximity to emissions sources, or duration of exposure to air pollutants. Schools, hospitals, and convalescent homes are considered to be relatively sensitive to poor air quality because children, elderly people, and the infirmed are more susceptible to respiratory distress and other air quality-related health problems on average than the general public. Residential areas are considered sensitive to poor air quality because people

usually stay home for extended periods of time, with associated greater exposure to ambient air quality. Recreational uses are also considered sensitive due to the greater exposure to ambient air quality conditions because vigorous exercise associated with recreation places a high demand on the human respiratory system.

Localized Pollutant Emissions

Construction

To assess the potential localized air quality impacts resulting from the project on nearby sensitive receptors during construction, the daily on-site construction emissions generated at the project site were evaluated against SCAQMD's applicable construction LSTs for a 0.63-acre site. The nearest sensitive receptor to the project site is the existing seven-story Axis Apartments located on South Hill Street directly east of the project site and the future mixed-use DTLA South Park Project that would be located directly west of the alley adjacent to the project site at the southeast corner of W. 11th Street and S. Olive Street. Other sensitive receptors in the project area include multi-family residential developments.

Because the mass rate look-up tables provided by SCAQMD provide only LSTs at receptor distances of 82, 164, 328, 656, and 1,640 feet, the LSTs for a receptor distance of 82 feet were used to evaluate the potential localized air quality impacts associated with the project's peak-day construction emissions.[17] This distance most closely corresponds to the distance from the project site to nearby sensitive receptors in the SCAQMD LST lookup tables.

As discussed previously, the project would implement PDF-AQ-1 during construction to minimize construction-related emissions. The localized on-site emissions that are estimated to occur during peak construction days for each year of the project's construction schedule with PDF-AQ-1 are presented in Table 6-5. As shown in Table 6-5, daily emissions generated on site by construction of the project would not exceed any of the applicable SCAQMD LSTs for a 0.63-acre site in source receptor area (SRA) 1 over the course of the entire construction schedule.

TABLE 6-5. LOCALIZED CRITERIA POLLUTANT CONSTRUCTION EMISSIONS WITH PDF-AQ-1[A]

Construction Year	Estimated Maximum Daily On-site Emissions (pounds per day)			
	NO_X	CO	PM10	PM2.5
2022	7	7	1	<1
2023	37	33	3	2
2024	10	9	< 1	< 1
2025	3	5	< 1	< 1
Applicable LSTs [a]	72.0	606.4	4.1	2.9
Threshold Exceeded?	**No**	**No**	**No**	**No**

Source: CalEEMod modeling output provided in Appendix A.
[a] The LSTs for a 0.63- acre site in SRA 1 were estimated from the corresponding LSTs for a 1-, 2-, and 5-acre site in SRA 1 (obtained from Appendix C [Localized Significance Threshold Screening Tables] of SCAQMD's Final Localized Significance Threshold Methodology document), using the linear regression calculation recommended by SCAQMD. 0.6 acres is the post-dedicated lot area.

[17] According to SCAQMD's LST methodology, it is recommended that projects with boundaries closer than 82 feet (25 meters) from the nearest receptor use the LSTs for receptors located at 82 feet.

Operations

Similar to the analysis of construction emissions, the daily amount of localized pollutant emissions generated on site by the project during operations was also assessed for its potential localized air quality impacts on nearby sensitive receptors. The operational emissions that would result from the project were assessed against SCAQMD's applicable operational LSTs for a 0.63-acre site, as explained above. Table 6-6 presents the on-site operational emissions that would result from the project. As shown, the project's operations-related emissions generated on-site would not exceed SCAQMD's applicable operational LSTs.

TABLE 6-6. LOCALIZED CRITERIA POLLUTANT OPERATIONAL EMISSIONS

Emissions Source	Estimated Maximum Daily On-site Emissions (pounds per day)[a]			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Area	5.8	41.8	0.6	0.6
Energy	1.3	0.7	0.1	0.1
Mobile [a]	0.3	1.5	0.5	0.1
Stationary [b]	32.7	1.9	0.2	0.2
Total Emissions	**40.1**	**45.8**	**1.4**	**1.1**
Applicable LSTs [c]	72.0	606.4	1.6	1.3
Threshold Exceeded?	**No**	**No**	**No**	**No**

Source: CalEEMod modeling output provided in Appendix A.
Note: Totals may not add exactly due to rounding.
[a] Localized operational emissions estimates assume all of the Area Sources and Energy Sources of emissions occur on site and 5 percent of emissions from Mobile Sources occur on-site.
[b] Stationary sources would be limited to two on-site, diesel-powered emergency generators. Although emissions were modeled, the generators would be reserved for emergencies and would not be used on a regular basis.
[c] The LSTs for a 0.63- acre site in SRA 1 were estimated from the corresponding LSTs for a 1-, 2-, and 5-acre site in SRA 1 (obtained from Appendix C [Localized Significance Threshold Screening Tables] of SCAQMD's Final Localized Significance Threshold Methodology document), using the linear regression calculation recommended by SCAQMD. 0.6 acre is the post-dedicated lot area.

In summary, the estimated localized construction and operational emissions associated with the project would not exceed any of SCAQMD's applicable LSTs for criteria pollutants. The LSTs represent the maximum emissions from a project that would not be expected to cause or contribute to a violation of any short-term NAAQS or CAAQS, and have been developed by the SCAQMD for each of the SRAs in the Basin. As noted previously, the NAAQS and CAAQS are health-protective standards that define the maximum amount of ambient pollution that can be present without harming public health. Consequently, projects with emissions below the applicable LSTs would not be in violation of the NAAQS or CAAQS and, thus, U.S. EPA and CARB health protective standards. Because the project's localized construction and operational emissions would not exceed the LSTs, the project would not cause or contribute to a violation of any health-protective CAAQS and NAAQS.

Health-Based Impacts from Project's Local Criteria Pollutant Emissions

As opposed to regional pollutants, localized pollutants generated by a project are deposited and potentially affect population near the emissions source. Because these pollutants dissipate with distance, emissions from individual projects can result in direct and material health impacts to adjacent sensitive receptors. Models and thresholds are readily available to quantify these potential health effects and evaluate their significance. The LSTs developed by SCAQMD represent the

maximum emissions from a project that would not be expected to cause or contribute to a violation of any short-term NAAQS or CAAQS, and have been developed by the SCAQMD for each of the SRAs in the Basin. The NAAQS and CAAQS are health-protective standards that define the maximum amount of ambient pollution that can be present without harming public health. Consequently, projects with emissions below the applicable LSTs would not be in violation of the NAAQS or CAAQS and, thus, U.S. EPA and CARB health protective standards. Because the project's localized construction and operational emissions would not exceed the LSTs, the project would not cause or contribute to a violation of any health-protective CAAQS and NAAQS.

Toxic Air Contaminants (TAC)

TACs are generally defined as those contaminants that are known or suspected to cause serious health problems, but do not have a corresponding ambient air quality standard. Air toxics are also defined as an air pollutant that may increase a person's risk of developing cancer and/or other serious health effects; however, the emission of a toxic chemical does not automatically create a health hazard. Air toxics are emitted by a variety of industrial processes that include petroleum refining, electric utility and chrome plating operations, commercial operations, such as gasoline stations and dry cleaners, and motor vehicle exhaust and may exist as PM_{10} and $PM_{2.5}$ or as vapors (gases). To date, CARB has identified 21 TACs and adopted U.S. EPA's list of hazardous air pollutants as TACs. In August 1998 CARB identified diesel particulate matter (DPM) emissions as a TAC, and in September 2000 CARB approved a comprehensive diesel risk reduction plan to reduce emissions from both new and existing diesel-fueled engines and vehicles.

Acute exposure to diesel exhaust may cause irritation to the eyes, nose, throat and lungs, and some neurological effects, such as lightheadedness. Acute exposure may also elicit a cough or nausea, as well as exacerbate asthma. Chronic exposure to DPM in experimental animal inhalation studies has shown a range of dose-dependent lung inflammation and cellular changes in the lung and immunological effects. Based upon human and laboratory studies, there is considerable evidence that DPM is a likely carcinogen. Human epidemiological studies have demonstrated an association between DPM exposure and increased lung cancer rates in occupational settings.

Construction

As discussed previously, DPM is classified as a carcinogenic TAC by CARB and is the primary pollutant of concern with regard to health risks to sensitive receptors during project construction. Diesel-powered construction equipment as well as heavy duty truck movement and hauling would emit DPM that could potentially expose nearby sensitive receptors to pollutant concentrations.

Based on the Health Risk Assessment analysis performed using AERMOD and estimated PM_{10} exhaust emissions generated by on-site construction activities, the health risks at the nearest sensitive receptor locations, including the future mixed-use DTLA South Park Project, resulting from exposure to DPM emissions were determined. The estimated excess cancer risk and non-cancer hazard index results at the analyzed receptor locations are presented in Table 6-7.

TABLE 6-7. ESTIMATED HEALTH RISK FROM DPM EXPOSURE DURING CONSTRUCTION

Receptor Locations[a]	Distance to Project Site (feet)	Cancer Risk (cases per million)	Chronic Hazard Index
Multi-family residential development located at 1100 S. Hill Street.	80	6.52	0.02
YWCA Greater Los Angeles campus building located at 1020 S Olive Street.	280	1.05	0.004
Multi-family residential development located at 1001 S. Olive Street.	425	0.36	0.001
Multi-family residential development located at 1100 S. Grand Avenue.	445	0.33	0.001
Future mixed-use DTLA South Park Project located at 1120 S. Olive Street.	90[b]	0.59	0.002
SCAQMD Thresholds		10	1.0
Exceed Threshold?		**No**	**No**

Source: ICF Emissions Modeling (Appendix A)
[a] The receptors analyzed in this analysis are the nearest existing and future sensitive receptor locations that would experience the highest DPM concentrations resulting from the project's construction activities.
[b] While this future mixed-use development is located directly west of the alley adjacent to the project site, the sensitive receptors (i.e., residences) at this site are set back from the alley and would be located approximately 90 feet to the west of the project site. The future development at 1120 S. Olive represents the closest of the future sensitive receptors in the area, and therefore emissions would be higher at 1120 S. Olive Street than the future developments at 1045 Olive Street and 1105 Olive Street.

As shown in Table 6-7, implementation of the project would not result in increased cancer risk or hazard index in excess of SCAQMD thresholds. As such, the project's construction activities would not result in a significant increase in health risks at nearby sensitive receptors.

Operations

Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes, automotive repair facilities, and dry-cleaning facilities. As the project consists of residential, TORS, and restaurant uses, the project would not include sources of substantive TAC emissions identified by the SCAQMD or CARB. Project operation would generate minimal amounts of TACs from the use of consumer products, periodic use of fuel-powered landscaping equipment, and from other activities associated with residential and commercial uses such as cleaning and reapplication of architectural coatings. However, these emissions are expected to be occasional and result in minimal exposure to off-site sensitive receptors. The project's restaurant operations would be subject to SCAQMD Rule 1138-Control of Emissions from Restaurant Operations. The project would comply with this rule by installing a control device, such as a catalytic oxidizer, on all char broilers in order to reduce PM and VOC emissions. Thus, operation of the project would result in less than significant health risk impacts.

Carbon Monoxide Hot Spots

A CO hot spot is a localized concentration of CO that is above the state or national 1-hour or 8-hour ambient air standards for the pollutant. CO hot spots at roadway intersections are typically found in areas with significant traffic congestion. CO is a public health concern because at high enough concentrations, it can cause health problems such as fatigue, headache, confusion, dizziness, and even death. However, it should be noted that ambient concentrations of CO have declined dramatically in California because of existing controls and programs.

Most areas of the state, including the region in which the project is located in, meet the state and federal CO standards.[18] As part of SCAQMD's 2003 AQMP, which is the most recent AQMP that addresses CO concentrations, a revision to the Federal Attainment Plan for Carbon Monoxide that was originally approved in 1992 was provided that included a CO hot spots analysis at four specified heavily traveled intersections in Los Angeles at the peak morning and afternoon time periods. These four intersection locations selected for CO modeling are considered to be worst-case intersections that would likely experience the highest CO concentrations. The CO hot spots analysis in the 2003 AQMP did not predict a violation of CO standards at the four intersections. Of these four intersections, the busiest intersection evaluated was that at Wilshire Boulevard and Veteran Avenue, which was described as the most heavily congested intersection in Los Angeles County with an average daily traffic (ADT) volume of approximately 100,000 vehicles per day. Based on the CO modeling, the 2003 AQMP estimated that the 1-hour and 8-hour concentrations at this intersection was 4.6 ppm and 3.5 ppm, respectively, which would not exceed the most stringent 1-hour CO standard of 20.0 ppm and 8-hour CO standards of 9 ppm. In reviewing the project's Traffic analysis, it was determined that at buildout (2026) the highest daily traffic volumes generated at an intersection within the vicinity of the project would be an estimated cumulative total of 24,180 vehicles per day at the intersection of Olive Street and 11th Street.[19] Because the daily amount of vehicles at this study intersection would not nearly exceed 100,000 vehicles per day, it can be concluded that the project would not exceed the most stringent 1-hour and 8-hour CO standards and no detailed CO hot spots analysis for the project would be required. Therefore, the project would not result in impacts related to CO hot spots, and would not contribute a significant level of CO such that localized air quality and human health would be substantially degraded.

Conclusion

The project's localized construction and operational emissions would not exceed the applicable LSTs and impacts related to local air quality and human health would be less than significant. Additionally, the project would not result in impacts related to CO hot spots and would not contribute a significant level of CO such that localized air quality and human health would be substantially degraded. Therefore, the project would not expose sensitive receptors to substantial pollutant concentrations. Mitigation measures are not required.

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

Less Than Significant Impact. According to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment facilities, food processing plants, chemical plants, composting areas, refineries, landfills, dairies, and fiberglass molding facilities. The project, which is a mixed-use development that consists of multi-family residential and commercial uses, includes none of these land uses. Restaurant

[18] California Air Resources Board (CARB). 2004. 2004 Revision to the California State Implementation Plan for Carbon Monoxide, Updated Maintenance Plan for Ten Federal Planning Areas. July 22. Available: https://ww3.arb.ca.gov/planning/sip/co/final_2004_co_plan_update.pdf. Accessed: July 19, 2021.

[19] Daily intersection volumes were estimated by assuming that combined vehicle volumes at the AM and PM peak hour would represent 20 percent of total daily volumes. Peak hour volumes were included in Appendix F to the Transportation Assessment (Fehr & Peers 2020).

operation is likely to generate some odors in the project vicinity related to exhaust, but applicable equipment would be subject to the 2016 AQMP measure BCM-01 and CMB-04 as well as SCAQMD Rule 1138, all of which would reduce odoriferous emissions at the project site such that the odors would not affect a substantial number of people. Project operation would also entail the on-site collection of trash from residents, visitors, and the restaurant, which may involve odors, but which would be collected regularly and contained in an area away from the habitable portions of the project such that odors would not affect a substantial number of people. Thus, operation of the project is not expected to result in objectionable odors for the neighboring uses and would not adversely affect a substantial number of people.

During construction of the project, exhaust from equipment, activities associated with the application of architectural coatings and other interior and exterior finishes, and paving activities may produce discernible odors typical of most construction sites. Such odors would be, at worst, a temporary source of nuisance to adjacent uses, if at all, and would not affect a substantial number of people. The project would use architectural coatings compliant with SCAQMD Rule 1113, which would limit the odors associated with off-gassing from those coatings. Odors associated with asphalt paving would only occur for a limited time period for the project (approximately 1 day), and the locations of paving activities would be distributed at the project site. Additionally, material deliveries and heavy-duty haul truck trips could create an occasional "whiff" of diesel exhaust for nearby receptors. These odors would not affect a substantial number of people because construction would be temporary, and construction-generated emissions dissipate rapidly with increasing distance from the source. Overall, odors associated with project construction would be temporary and intermittent in nature and would not create a significant level of objectionable odors affecting a substantial number of people.

Conclusion

The project's other emissions such as those leading to odors would result in a less than significant impact, and mitigation measures are not required.

Regulatory Compliance Measures

RCM-AQ-1 Site Clearing, Grading and Construction Activities:

- Compliance with provisions of the SCAQMD District Rule 403. The project shall comply with all applicable standards of the Southern California Air Quality Management District, including the following provisions of District Rule 403:

  – All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.

  – The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.

- All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust.

- All dirt/soil loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.

- All dirt/soil materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.

- General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.

- Trucks having no current hauling activity shall not idle but be turned off.

RCM-AQ-2 In accordance with Sections 2485 in Title 13 of the California Code of Regulations, the idling of all diesel fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location.

RCM-AQ-3 In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards

Cumulative Impacts

Cumulative impacts can result from individually minor, but collectively significant, projects taking place over a period of time. The study area for analysis of cumulative effects on air quality is the Basin, which experiences chronic exceedances of state and federal ambient air quality standards as a consequence of past and present projects and is subject to continued nonattainment status by reasonably foreseeable future projects. These nonattainment conditions within the region are considered cumulatively significant. Therefore, SCAQMD thresholds have been established to ensure attainment of the NAAQS and CAAQS.

The City has identified related projects located in the project site area that have not yet been built or that are currently under construction. Since both the timing and the sequencing of the construction of the related projects are unknown, any quantitative analysis to ascertain daily construction emissions that assumes multiple, concurrent construction projects would be speculative. For this reason, the SCAQMD's recommended methodology for assessing a project's cumulative impacts differs from the cumulative impacts methodology employed elsewhere in this SCEA. The SCAQMD recommends using two different methodologies: (1) that project-specific air quality impacts be used to determine a project's potential cumulative impacts to regional air

quality;[20] or (2) that a project's consistency with the current AQMP be used to determine its potential cumulative impacts.

As discussed and demonstrated in the analysis under Section 6.3a, the project would not conflict with, or obstruct implementation of, the AQMP. Additionally, as discussed under Sections 6.3b and 6.3c above, the project's construction and operational emissions would not exceed SCAQMD's applicable regional pollutant thresholds or LSTs. Based on SCAQMD's cumulative air quality impact methodology, if a project's emissions do not exceed the recommended daily thresholds for project-specific impacts, its impacts would not be cumulatively considerable and would not contribute to nonattainment of applicable air quality standards in the Basin. As such, the project's cumulative impacts with respect to air quality would be less than significant and would not be cumulatively considerable.

Conclusion

The project's construction and operational cumulative impacts would be less than significant and would not be cumulatively considerable, and mitigation measures are not required.

[20] South Coast Air Quality Management District, Potential Control Strategies to Address Cumulative Impacts from Air Pollution White Paper, Appendix D, 1993, page D-3, http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper-appendix.pdf?sfvrsn=4. Accessed August 2021.

6.4 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, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c.	Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, 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?	☐	☐	☒	☐
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?	☐	☐	☐	☒

The following discussion regarding biological resources is based, in part, on the technical report prepared for the project, entitled *Tree Evaluation Report for the 1111 South Hill Street Project Site, City of Los Angeles, California,* prepared by Psomas, dated August 6, 2021, and contained in Appendix B.

Would the project:

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

Less Than Significant Impact. The project site is located within a highly urbanized area and is currently developed with a vacant warehouse building. The only biological resources permanently located on the project site are trees, shrubs, and other plants. As stated in the *Tree Evaluation Report for the 1111 South Hill Street Project Site, City of Los Angeles, California*, there are no trees located in the interior of the property. There are three street trees on the South Hill Street sidewalk fronting the project site and three street trees are present along the West 11th Street sidewalk. These trees

include three Canary Island pines (*Pinus canariensis*) located southeast of the project site along South Hill Street and three goldenrain trees (*Koelreuteria paniculata*) located along the northeast project boundary on 11th Street. Trees that are designated as "protected trees," as defined by LAMC Section 17.02, include the following trees that have a diameter at breast height (dbh) of more than four inches in cumulative diameter: oak trees (*Quercus* spp.), southern California black walnuts (*Juglans californica*), western sycamores (*Platanus racemosa*), and California bay laurels (*Umbellularia californica*).

There are no protected trees on the project site. There are six existing street trees surrounding the project: three existing Chinese Flame trees along 11th Street and three existing Canary Island Pine trees along South Hill Street. The project would remove one Canary Island Pine and would provide two new Canary Island Pine trees along South Hill Street, resulting in a total of seven street trees after completion of the project. Furthermore, the new street trees would be included as part of 120 new trees planted on the project site.

As discussed above, most of the project site is developed with urban uses and does not contain or provide habitat that supports candidate, sensitive, or special-status species. However, the loss of a tree may result in potential impacts that may be significant related to species identified as a candidate, sensitive, or special-status species.

The removal and placement of street trees would be subject to the review and approval of the Board of Public Works, Urban Forestry Division. Prior to the issuance of any permit, a plot plan shall be prepared indicating the location, size, type, and general condition of all existing trees on the site and within the adjacent public right(s)-of-way (see RCM-BIO-1, below) and per Section 62.177 of the LAMC, the Applicant shall pay an in-lieu tree replacement fee for any trees removed in the public right-of-way that cannot be replaced on site. Therefore, the project would have a less than significant impact upon removal of a non-protected tree.

Additionally, the removal of vegetation and disturbances to potential bird habitat may result in take of nesting native bird species. However, all migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R Section 10.13). Sections 3503, 3503.5 and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). The Department of City Planning enforces the MBTA through precautionary and preventative measures to avoid or reduce the potential for disturbances to wildlife during construction. The project Applicant will be required to ensure compliance with all applicable laws and regulations to ensure that no significant impacts to nesting birds would occur due to the removal of the existing tree located on the project site. As a standard practice, the Department of Building and Safety requires regulatory compliance measure RCM-BIO-2, which would avoid any potential impacts related to native birds during construction activities. Therefore, with adherence to existing laws and regulations, the project would have a less than significant impact on sensitive biological species or habitat.

Regulatory Compliance Measures

RCM-BIO-1: Tree Removal (Public Right-of-Way). Removal of trees in the public right-of way requires approval by the Board of Public Works. The required Tree Report shall include the location, size, type, and condition of all existing trees in the adjacent public right-of-way and shall be submitted for review and approval by the Urban Forestry Division of the Bureau of Street Services, Department of Public Works. Per Section 62.177 of the LAMC, the Applicant shall pay an in-lieu tree replacement fee for any trees removed in the public right-of-way that cannot be replaced on site.

RCM-BIO-2: Proposed project activities (including disturbances to native and non-native vegetation, structures and substrates) should take place outside of the breeding bird season which generally runs from March 1- August 31 (as early as February 1 for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture of kill (Fish and Game Code Section 86).

If project activities cannot feasibly avoid the breeding bird season, beginning thirty days prior to the disturbance of suitable nesting habitat, the applicant shall:

- Arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within 300 feet of the construction work area (within 500 feet for raptors) as access to adjacent areas allows. The surveys shall be conducted by a Qualified Biologist with experience in conducting breeding bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of clearance/construction work.

- If a protected native bird is found, the applicant shall delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species (within 500 feet for suitable raptor nesting habitat) until August 31.

- Alternatively, the Qualified Biologist could continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest (within 500 feet for raptor nests) or as determined by an qualified biological monitor, shall be postponed until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. The buffer zone from the nest shall be established in the field with flagging and stakes. Construction personnel shall be instructed on the sensitivity of the area.

- The Applicant shall record the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds. Such record shall be submitted and received into the case file for the associated discretionary action permitting the project**.**

Conclusion

Based on the impact analysis and compliance with existing laws and regulations, the project would have a less than significant impact on sensitive biological species or habitat.

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

No Impact. The project site is located in an urbanized area of the City. The project site is developed with a vacant warehouse structure and does not contain riparian habitat or sensitive natural community including wetlands. The project site and surrounding area is not located within or adjacent to a significant ecological area (SEA).[21]

Conclusion

As the project is located in an urbanized area and development of the project would not result in any adverse effect on riparian habitat or other sensitive natural community, no impact would occur, and no mitigation measures are required.

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. The project site is located in an urbanized area of the City. The project site is developed and does not contain state or federally protected wetlands.

Conclusion

As the project does not contain and would not impact federally protected wetlands, no impacts would occur. No mitigation measures are required.

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

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

Nonetheless, the project site does include non-native trees that could support raptor and/or songbird nests. While the project would remove one of the three street trees along South Hill Street, two new

[21] City of Los Angeles. *General Plan Conservation Element, Exhibit B2, SEAs and other Resources*. March 2001. Available: https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation_Element.pdf. Accessed: August 2021.

street trees would be planted resulting in a total of seven street trees along the project site. In addition, these two trees would be part of 120 new trees provided on the project site, such that the project would provide greater habitat area for birds. As a standard practice, the Department of Building and Safety requires regulatory compliance measure RCM-BIO-2, which would avoid any potential impacts related to native birds during construction activities. Therefore, with adherence to existing laws and regulations, the project would have a less than significant impact on wildlife species or habitat.

Operation of the proposed project would introduce a new 40-story mixed-use building on the project site. The new building has the potential to misdirect or confuse migratory birds, resulting in disruption of natural behavioral patterns and possible injury or death from exhaustion or collisions with buildings. Operational impacts related to potential bird strikes on taller structures are primarily related to bird species being injured or killed by flying into large, uninterrupted areas of glass or other reflective surfaces that, to a bird, may not appear noticeably different from the surrounding area or the sky. At night, especially during inclement weather during spring and fall bird migrations, birds can be attracted to lighted structures, resulting in collisions, entrapment, excess energy expenditure, and exhaustion.

The project includes design features that minimize large, uninterrupted reflective surfaces, including the uses of vertical and horizontal mullions in a timber-like tone, a series of balconies along the spine of the building, and integration of cascading vegetation on the lower level floors and roof that serve to break up the surface of the building. The project also includes four distinctive circular crown rooftop elements. To minimize the potential for lighting to contribute to bird strikes, the building will use outdoor lighting that would be designed to reduce night-time attraction of birds and thus strike potential. This includes outdoor lighting that would be designed and installed with shielding, such that lighting would be directed and focused on the project in accordance with LAMC lighting regulations that require that operational lighting be directed downward or on the specific on-site features to be lit. All Federal Aviation Administration lighting would comply with obstruction and marking guidelines by ensuring that required obstruction lighting is comprised of only L-864 strobe lights with appropriate flash rates and extinguish all steady burning L-810 lights.

These project design features would serve to minimize operational impacts related to the risk of bird strikes and impacts would be less than significant.

Conclusion

With compliance with federal and state regulations related to the protection of migratory fish and wildlife species, impacts would be less than significant.

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

Less Than Significant Impact. There are no native tree species within the project site that would be subject to the protection of Ordinance No. 177404 of the LAMC (Section 1, Subdivision 12, of Subsection A of Section 12.21, as amended). However, there are six existing non-native, non-protected street trees; one of which would be removed as part of the project but would be replaced

by two new street trees, for a total of seven street trees along the perimeter of the project site. In addition, these two trees would be part of 120 new trees provided on the project site.

As discussed above, the removal and placement of street trees would be subject to the review and approval of the Board of Public Works, Urban Forestry Division. Prior to the issuance of any permit, a plot plan shall be prepared indicating the location, size, type, and general condition of all existing trees on the site and within the adjacent public right(s)-of-way (RCM-BIO-1) and per Section 62.177 of the LAMC, the Applicant shall pay an in-lieu tree replacement fee for any trees removed in the public right-of-way that cannot be replaced on site. The project would be required to comply with the Federal Migratory Bird Treaty Act and Sections 3503, 3503.5, and 3513 of the California Fish and Game Code, which prohibits take of all birds and their active nests including raptors and other migratory nongame birds (RCM-BIO-2).

Thus, any impacts upon the loss of on-site trees would be less than significant.

Conclusion

Compliance with existing laws, regulations and regulatory requirements would ensure that impacts related to local policies and ordinances protecting biological resources would be less than significant.

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

No Impact. The project site is located in an urbanized area of the City. The project site is not located within a SEA.[22] Additionally, there is no adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan in place that includes the project site.[23,24,25] Therefore, implementation of the project would not conflict with a habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan.

Conclusion

Because there is no adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan in place that includes the project site, the implementation of the project would not conflict with any such plan. No mitigation measures are required.

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22 Los Angeles County. *Significant Ecological Areas and Coastal Resource Areas Policy Map*. Available: http://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_9-3_significant_ecological_areas.pdf. Accessed: May 12, 2020.

23 California Department of Fish and Wildlife. *California Regional Conservation Plan*. August 2015. Available: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline. Accessed: May 12, 2020.

24 U.S. Fish and Wildlife Service. *Habitat Conservation Plans – Region 8*. Available: http://ecos.fws.gov/ecp0/conservationPlan/region/summary?region=8&type=HCP. Accessed: May 12, 2020.

25 U.S. Fish and Wildlife Service, Carlsbad Fish and Wildlife Office. *Habitat Conservation Plan Documents*. Available: https://www.fws.gov/carlsbad/hcps/HCP_Docs.html. Accessed: May 12, 2020.

Cumulative Impacts: Biological Resources

Similar to the project, all of the related projects occurring in the project site area would occur on previously disturbed, urbanized land. As discussed above, the project site does not contain sensitive biological resources or habitat, including wetlands, and is not part of a wildlife corridor and therefore could not contribute to a cumulative effect on these resources. The project would fully comply with City ordinances pertaining to tree removal, planting or payment of required in-lieu fees.

The project would have a less than significant impact upon biological resources with adherence to applicable regulatory compliance measures.

Related projects would also be required to comply with the City's tree requirements and to adhere to the MBTA and California Fish and Game Code provisions; therefore, cumulative impacts on nesting birds would be less than significant and the project would not make a cumulatively considerable contribution to this impact.

Conclusion

Compliance with applicable regulatory requirements and plans would ensure that cumulative impacts to biological resources would be less than significant.

6.5 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 Section 15064.5?	☐	☐	☐	☒
b.	Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☐	☒	☐
c.	Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

The following discussion regarding Cultural Resources is based, in part, on the technical report prepared for the project, titled *1111 S. Hill Street Historical Resources Technical Report*, prepared by GPA Consulting, in May 2020 (revised June 2021) and contained in Appendix C and *Cultural and Paleontological Resources Assessment Report* prepared by ICF in December 2021 contained in Appendix C.

Would the project:

a. Cause a substantial adverse change in the significance of a historical resources pursuant to §15064.5?

No Impact.

Building on the Project Site

The project site is currently developed with a two-story concrete building constructed in 1954 for use as office space, paper storage, and warehouse activities. The north, east, and west building elevations have stucco cladding with widely spaced vertical scoring across the middle of the street-facing elevations. The main entrance is located in the first bay on the south side of the east elevation facing South Hill Street. A secondary entrance is located on 11th Street and is recessed with paired, solid metal doors enclosed by a metal security gate. The building also features garage bays on both street-facing elevations. Fenestration is limited to bands of clerestory windows across the north, east, and west elevations. At the South Hill Street (east) and 11th Street (north) elevations, windows are set in a slightly canted stucco surround. The Hill Street elevation is seven bays across and the 11th Street elevation is six bays across. The south elevation is a board-form concrete wall with no fenestration.

History of the Project Site

Development on the project site followed a typical pattern for the South Park area. The project site was initially developed with single-family homes in the late nineteenth century. These homes were demolished or relocated when a one-story commercial building with five storefronts and a bookbinding building were constructed on the site in 1913. The buildings were designed by the noted Los Angeles architecture firm Hunt & Burns. The buildings were altered often as tenants

changed. The building on 11th Street was generally used for commercial uses or restaurants for 50 years, with the building on Hill Street used as an insurance office. The buildings were demolished in 1954 and a new building was constructed by Hearst Publications, the parent company of the Los Angeles Herald-Examiner newspaper. The newspaper's main building (Los Angeles Herald Examiner Building, 1111 S. Broadway, extant) and Press Building (1108 South Hill Street, demolished) were located east of the project site.

Setting

The project site is located in an urban setting of varied development. Buildings range from low, mid, and higher-rise buildings constructed between the 1910s and 1950s to high-rise buildings constructed between the 1960s and 2010s. In the 2000s, the area to the south and west of the project site became known as South Park and a considerable amount of infill has been constructed in the last decade. As a result of infill development and layered periods of development, the streets throughout South Park lack a sense of hierarchy and the built environment lacks cohesion. The street wall that often characterizes the main north-south thoroughfares of the historic core of Downtown north of the project site is not present in the area immediately surrounding the project site. In the study area, setbacks, primary entrances, and loading docks channel vehicular and pedestrian circulation away from north-south streets.

Direct Impacts

As analyzed in *the 1111 South Hill Street Historical Resources Technical Report,* the building on the project site is not currently listed as a historical landmark under national, state, or local programs and is not included as historically significant in any historic resource surveys of the area, including SurveyLA. Using the established criteria and aspects of integrity, the building does not meet the eligibility standards for any themes developed in the Los Angeles' Citywide Historic Context Statement (LACHCS) due to a lack of historic significance, architectural character, and physical integrity. Therefore, the building on the project site is not considered a historic resource and no historical resources would be demolished, destroyed, relocated, or altered as a result of the project. As such, there would be no direct impacts on historical resources.

Indirect Impacts

Historical Resources in the Project Study Area

Although there are no historical resources located on the project site, there are three designated historical resources and four potential historical resources in the study area (see Table 6-8). The four potential historical resources were all identified as eligible for listing through SurveyLA evaluation as part of the Central City Community Plan area survey completed in 2016.

TABLE 6-8. HISTORICAL RESOURCES IN STUDY AREA

Reference Number	APN	Address	Name	Year Built	Potential or Designated Historic Resource Designation
1	5139-011-901	1031 S. Hill Street	Joseph Basch Company Building (historic)	1920	Potential Resource per SurveyLA
2	5139-011-001	209 W. 11th Street	Hill Grill (current)	1933	Potential Resource per SurveyLA
3	5139-013-008	1036 S. Hill Street	Mayan Theater (common)	1927	Designated Resource HCM #470
4	5139-013-019	1050 S. Hill Street	Belasco Theater (common)	1926	Designated Resource HCM #476
5	5139-013-014	1023 S. Broadway	Western Pacific Building (common)	1925	Potential Resource per SurveyLA
6	5139-019-035	1111 S. Broadway	Los Angeles Herald Examiner Building (common)	1914	Designated Resource HCM #178
7	5139-012-015	1220 S. Olive Street	Iris Apartments (historic)	1907	Potential Resource per SurveyLA

None of the historical resources listed in Table 6-8 is within the same block as the project site. All of the historical resources are separated from the project site by a street. Because the project site is located outside the parcel boundaries of the seven historical resources in the study area, the project would not impact their integrity of immediate setting. Only one historical resource, 209 W. 11th Street (Hill Grill) discussed more below, is not separated from the project site by intervening buildings. The other six historical resources would not be affected by the new building, due to the physical and visual separation between these historical resources and the project site.

Hill Grill

The Hill Grill is located at the northwest corner of 11th and South Hill streets, directly across 11th Street north of the project site. The Hill Grill did not retain integrity of setting when it was evaluated eligible for listing at the local and state levels by SurveyLA in 2016. When the Hill Grill was constructed in the 1930s, the setting comprised low, medium, and higher rise buildings from the 1910s and 1920s. Immediately north of the Hill Grill building was the five-story high Joseph Basch Company Building. To the south was the nine-story high Southwestern University. In the later decades of the twentieth century, the setting of the Hill Grill developed into its present state, characterized by a mixture of low, medium, and high rise residential, commercial, and institutional buildings.

The project would introduce a new building substantially taller than the current building on the project site to the setting of the Hill Grill; however, the height of the new building (520 feet above ground level) would not diminish the integrity of the Hill Grill to a degree that it would no longer retain integrity as a whole. The Hill Grill would still retain integrity of location, design, and feeling as a Mimetic walk-up food stand building. According to the eligibility standards in the Los Angeles' Citywide Historic Context Statement (LACHCS), buildings of this property type may not retain

integrity of setting while still retaining sufficient integrity to convey their significance. The project's proposed change to the setting, along with changes proposed by nearby related projects' heights and mass, would not impact an essential aspect of integrity for the Hill Grill to convey its historical significance. As such, the changes to the setting of the Hill Grill would not cause indirect impact to the setting of the historical resource.

In the dense urban setting of Downtown Los Angeles, the construction of new buildings across the street from historic buildings is not uncommon, and new development has already occurred in close proximity to these historical resources. The seven historical resources' broader surroundings, namely their relationship to their surrounding features, has already been altered by demolition and new construction. The project would continue the pattern of development in place since the South Park area's transformation began in the 2000s. Therefore, while the project would introduce a new visual element to the area surrounding the seven historical resources in the study area, the overall integrity of setting has already been diminished by changes to the built environment over time.

Views of historical resources would not be obscured as a result of the project. The most important views of these historical resources are of their primary, street-facing elevations. None of the street-facing elevations of the historical resources would be obscured by the project. New construction at 1108 South Hill Street, the former site of the Press Building, has already obscured views of the rear elevation of the Los Angeles Herald-Examiner Building on Broadway that may have been visible from the project site.

As such, the project would have no indirect impacts on the historical resources in the study area.

Conclusion

No impacts to historical resources would occur. No mitigation measures are required.

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

Less Than Significant Impact. ICF conducted general and property-specific archival research to establish a historic context for the study area and inform the identification and analysis of cultural resources. Resources consulted included the previous cultural resources studies and records found during a formal literature review/records search, as well as primary and secondary resources from local repositories, including maps and photographs. A request for an archaeological record search was sent to South Central Coastal Information Center (SCCIC) on April 6, 2020. An official SCCIC response was received on May 27, 2020. The record search revealed no archaeological resources have been recorded in either the project area or within the 0.5-mile radius of the project site. A total of 46 cultural resource studies have been conducted within a 0.5-mile radius of the project site, with one of them conducted within a portion of the study area. However, no archaeological resources were found within the 0.5-mile radius in any of the aforementioned studies.

A Sacred Lands File search was requested from the Native American Heritage Commission (NAHC) on April 14, 2020. The NAHC responded that the Sacred Lands File yielded negative results for tribal cultural resources (TCRs). ICF also conducted a literature review to determine if the project would have the potential to adversely affect prehistoric and historical archaeological

resources, thus requiring the consideration of avoidance and minimization. Various online aerial photographs of the region from the Nationwide Environmental Title Research (NETR) Online were inspected as far as 1948. In the end of the 19th Century and the beginning of the 20th Century, various domestic structures were located within the project site as shown in Sanborn Fire Insurance maps from 1888 and 1894. However, these structures were demolished to make room for several one-story commercial buildings in 1913. Then again in 1954, these were demolished for the construction of the current two-story building, which was initially associated with the *Los Angeles Herald-Examiner*. It is worth noting that the structure was built to sustain the addition of various floors above the initial two. In addition, a tunnel was built underneath the structure to the printing room located across Hill Street at 1108 S. Hill Street.

An offshoot of the zanja system,[26] namely Zanja No. 8, was located a block east from the project site, between Olive Street and Charity Street (now Grand Avenue). This section of the zanja system, branched off the Zanja Madre south of Requena Street, somewhere near Temple Street and First Street, flowing near Pershing Square, and then continuing in a southwesterly direction along Olive Street. To facilitate the increase in demand for water in the western areas of downtown, another branch, Zanja 8-R (also known as the Woolen Mill Ditch Zanja) was added in the 1870s. This zanja flowed along Flower Street, several blocks west of the project site. Due to the low slope, the increasing cost of upkeep, and the construction nearby of the Zanja No. 8-R, these segments of the Zanja No. 8, which include the portions that existed in the vicinity of the project site, were abandoned around 1870.

The project would not result in significant impacts on archaeological and tribal cultural resources related to a substantial adverse change in the significance of a prehistoric archaeological resource. There are no known previously recorded archaeological resources or tribal cultural resources within the proposed project area. Although a branch of the zanja system flowed in the vicinity of the project area the project is expected to have no direct impact on this cultural resource, as this section of the zanja was an open ditch that was abandoned before the urbanization of the South Park neighborhood. Any surviving elements of this ephemeral cultural resource would have been spatially constrained to the width of the ditch itself (outside the project site), and it would have been lost during the development of the neighborhood. Therefore, the project is not expected to cause a substantial adverse change in the significance of an archaeological resource. Based on the historical disturbance and construction of the area, the sensitivity for intact, buried archaeological deposits of historic age within the project area is relatively low.

Archaeological materials may include prehistoric resources such as flaked and ground stone tools and debris, shell, bone, ceramics, and fire-affected rock as well as historical resources such as glass, metal, wood, brick, or structural remnants. However, if unanticipated archaeological resources are encountered during ground-disturbing activities, the City of Los Angeles would contact a qualified archaeologist to evaluate and determine appropriate treatment for the resource.

[26] Zanja Madre (Mother Ditch), which transported water from Los Angeles River to the various field and domestic dwellings of the town.

Per PRC Section 21083.2(f), a lead agency may make provisions for archaeological sites accidently discovered during construction. The project Applicant would be required to comply with the City's standard condition of approval related to inadvertent discovery of unknown archaeological resources (RCM-CR-1**)**. In the event that any subsurface cultural resources are encountered at the project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately. The applicant shall notify the City and consult with a qualified archaeologist who shall evaluate the find in accordance with federal, state, and local guidelines, including those set forth in PRC Section 21083.2, and shall determine the necessary findings as to the origin and disposition to assess the significance of the find. If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the City must be followed unless avoidance is determined to be unnecessary or infeasible by the City. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted. Compliance with this condition would ensure that project impacts related to unknown archaeological resources would be less than significant.

Regulatory Compliance Measure

RCM-CR-1. In the event that cultural resources (sites, features, artifacts, or fossilized material) are exposed during construction activities for the project, all construction work occurring in the vicinity of the find shall immediately stop until a qualified specialist, meeting the Secretary of the Interior's Professional Qualification Standards, can evaluate the significance of the find and determine whether additional study is warranted. Depending upon the significance and nature of the find under CEQA (14 CCR 15064.5(f); PRC Section 21082), the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan, testing or data recovery may be warranted.

Conclusion

With compliance with regulatory requirements and the City's standard condition, the project's potential impacts related to unknown archaeological resources would be less than significant and no mitigation is required.

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

Less Than Significant Impact. The project site is developed with vacant warehouse building. Although the project site has been subject to grading and development in the past, the project would require excavations at a depth of approximately 45 feet below ground surface (bgs). As a result, construction may disturb human remains, including those interred outside of dedicated cemeteries. Such an event is a potentially significant impact under CEQA.

If human remains are exposed during construction, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the county coroner has made the necessary findings as to origin and disposition, pursuant to PRC Section 5097.98. If the county coroner concludes that the remains are of Native American descent, NAHC must be notified within 24 hours, and NAHC guidelines would be adhered to in the treatment and handling of the remains

(RCM-CR-2**)**. With regulatory compliance, the project's potential impacts would be less than significant.

Regulatory Compliance Measure

RCM-CR-2 If human remains are encountered unexpectedly during construction demolition and/or grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code (PRC) Section 5097.98. In the event that human remains are discovered during excavation activities, the following procedure shall be observed:

- Stop immediately and contact the County Coroner:

  1104 N. Mission Road
  Los Angeles, CA 90033
  323) 343-0512 (8 a.m. to 5 p.m. Monday through Friday) or
  (323) 343-0714 (After Hours, Saturday, Sunday, and Holidays)

- If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC).

- The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American.

- The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.

- If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.

Conclusion

Impacts would be less than significant and no mitigation is required.

Cumulative Impacts: Cultural Resources

Impacts to historical resources, if any, tend to be site specific. However, cumulative impacts would occur if the project and related projects cumulatively affect historical resources in the immediate vicinity, contribute to changes within the same historic district, or involve resources that are examples of the same property type as those within the project site.

As discussed above, the project would have no direct or indirect impacts on historical resources on the project site or in the study area. There are nine proposed and ongoing projects located within the study area and include the following:

- Related Project No. 8: 1111 South Broadway – No historical resources are being demolished, destroyed, or relocated as a result of this project, which includes the Herald Examiner Building. The building is a historical resource as it is listed under national, state, and local landmark programs. It is being rehabilitated in compliance with the Standards, therefore the project would have a less than significant impact on the historical resource.

- Related Project No. 9: 1120 South Grand Avenue – This project known as Aven Tower was completed in 2019. No historical resources were demolished, destroyed, relocated, or altered as a result of the project.

- Related Project No. 15: 1030 South Hill Street – No historical resources are being demolished, destroyed, relocated, or altered as a result of the project, which is replacing a surface parking lot.

- Related Project No. 20: 1045 South Olive Street – No historical resources are being demolished, destroyed, relocated, or altered as a result of the project. An existing commercial building would be removed, but it is not a historical resource.

- Related Project No. 21: 1155 South Olive Street – No historical resources are being demolished, destroyed, relocated, or altered as a result of the project, which is replacing a surface parking lot.

- Related Project No. 24: 1105 South Olive Street – No historical resources are being demolished, destroyed, relocated, or altered as a result of the project, which is replacing a surface parking lot.

- Related Project No. 26: 1000 South Hill Street – No historical resources are being demolished, destroyed, relocated, or altered as a result of the project, which is replacing a surface parking lot.

- Related Project No. 27: 1001 South Olive Street – This project known as Oakwood Olympic & Olive was completed in 2017. No historical resources were demolished, destroyed, relocated, or altered as a result of the project.

- Related Project No. 31: 1120 South Olive Street – No historical resources are being demolished, destroyed, relocated, or altered as a result of the project, which is replacing a surface parking lot.

These projects would continue an established pattern of development in the South Park area and there is no potential for cumulative impacts to the setting of historical resources in the study area as a result of this development pattern. Therefore, there would be no potential for cumulative impact to historical resources in the immediate vicinity.

Cumulative impacts to historical resources must also consider changes within the same historic district. However, the project site is not located within the boundaries of a historic district. Additionally, cumulative impacts to historical resources must consider whether a project

substantially diminishes the number or significance of historical resources of the same property type, even if they are not otherwise on the related projects list. As discussed above, the project would have no direct or indirect impacts on historical resources on the project site or in the study area. The existing warehouse building on the project site does not appear to be eligible for listing as a historical resource under national, state, and local landmark or historic district designation programs for lack of significance. Therefore, there would be no potential to contribute cumulative impacts to historical resources of the same property type.

While the project would introduce a new visual element to the study area, it would not affect the setting of any of the identified historical resources. The overall integrity of setting of the study area has already been changed by demolition and new construction. The seven historical resources would also remain highly visible and continue to be prominent features of the block on which they are located. Therefore, the project would not result in a substantial adverse change to the immediate surroundings of these historical resources to the degree that they would no longer be eligible for listing under national, state, or local landmark programs. None of the historical resources in the study area would be materially impaired as a result of the project and cumulative impacts would be less than significant.

Many of the related projects would require excavation that could potentially expose or damage potential archaeological resources or disturb human remains. However, the related projects are located in developed urban areas with sites that have been previously disturbed, and the potential to encounter and cause a significant impact on surface resources is unlikely. Moreover, such impacts are not cumulative in combination with the project's potential impacts, but are rather discrete and entirely separate from the project's potential impacts. Furthermore, in association with CEQA review, and depending on the depth of excavation and sensitivity of respective sites, mitigation measures and/or compliance with regulatory measures for the protection of human remains would be identified and implemented for those related projects that have the potential to cause significant impacts to undiscovered archaeological resources or to disturb human remains.

Conclusion

Cumulative impacts related to cultural resources would be less than significant.

6.6 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?	☐	☐	☒	☐

Would the project:

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

Less Than Significant Impact. A significant impact would occur if the project would result in wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. The project would redevelop the project site by replacing the existing vacant warehouse building currently on site with a 40-story mixed-use building with TORS units, residential condominiums, and commercial uses. The project is required to comply with California's Energy Efficiency Standards established in Title 24, Part 6, of the California Code of Regulations (CCR). These standards were first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated by the California Energy Commission on an approximately three-year cycle to allow consideration and possible incorporation of new energy efficiency technologies and methods. Part 11 of the Title 24 Building Standards Code is referred to as the CALGreen Code. The purpose of the CALGreen Code is to improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact or positive environmental impact having a positive environmental impact and encouraging sustainable construction practices in the following categories: (1) planning and design; (2) energy efficiency; (3) water efficiency and conservation; (4) material conservation and resource efficiency; and (5) environmental quality. The CALGreen Code establishes mandatory measures for new residential and non-residential buildings, which includes requirements for energy efficiency, water conservation, material conservation, planning and design, and overall environmental quality. The project would comply with the applicable provisions of Title 24 and the CALGreen Code and would install energy and water efficient appliances. The project would comply with the 2019 Building Energy Efficiency Standards, which improved upon the 2016 Standards for new construction of, and additions and alterations to, residential and nonresidential buildings. The 2019 Building Energy Efficiency Standards went into effect January 1, 2020.[27]

[27] https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency. Accessed August 4, 2020.

Construction

Energy use associated with phased construction of the project would consist of diesel fuel consumption by on-road trucks (hauling and vendor trips) and off-road construction diesel equipment, and gasoline consumption by on-road worker vehicles (commute trips). Construction of the project would require the export of asphalt, earth material, and building debris from the project site during the demolition and site clearing phases as well as the delivery of building materials during the building phase.

The estimated total gasoline and diesel fuel anticipated to be used during construction is summarized below in Table 6-9, *Summary of Estimated Energy Use During Project Construction*, and in Appendix D, Energy Consumption Worksheets. As shown, construction of the project would consume an estimated 158,231 gallons of gasoline and 122,446 gallons of diesel during construction, as well as approximately 3,037 megawatt-hours (MWh) of electricity.[28]

TABLE 6-9. SUMMARY OF ESTIMATED ENERGY USE DURING PROJECT CONSTRUCTION

Energy Type	Total Quantity
Gasoline	
Worker vehicle commute trips	158,231 gallons
Diesel	
Off-road equipment and on-road trucks	122,446 gallons
Electricity	
Electric-powered off-road equipment and construction office	3,037 MWh

Source: ICF 2020
NOTES:
Detailed calculations are provided in Appendix D of this SCEA. Based on Project Construction Schedule.

As the construction phase of the project would be temporary and the fact that the extent of fuel consumption is typical of land use developments of this size and nature, fuel consumption impacts would not be considered a wasteful, inefficient, or unnecessary consumption of energy resources. The proposed mixed-use development is not expected to require a large amount of energy consumption during construction, as may occur with large, industrial facilities (e.g., new power plants or dams). Construction of the project would occur over an approximately 36-month period; thus, construction-related energy use would be temporary and would represent a relatively short demand on local and regional fuel supplies that would be accommodated. Given the schedule for construction, energy consumption related to construction equipment use and the number of days that workers would commute to the project site would be consumed in an efficient manner. During this construction phase, the project would comply with regulatory compliance measures, such as restricting haul trucks to off-peak hours and not allowing engines to idle in excess of 5 minutes when not in use (CARB Air Toxics Control Measure), and meeting specified fuel and fuel additive requirements and emission standards (CCR Title 13, Sec. 2485). Adherence to these measures would increase energy efficiency and reduce consumption of fossil fuels. The energy demands during construction would be typical of construction projects for projects of this size and would not

[28] See Energy Consumption Worksheets included as Appendix D

necessitate additional energy facilities or distribution infrastructure or cause wasteful, inefficient or unnecessary consumption of energy. According to the will serve letter dated January 14, 2019, LADWP has indicated it has enough capacity to provide electricity to the project site and LADWP states that the estimated electricity requirement for the project is part of the total load growth forecast for the City and has been considered in the planned growth of the power system.

Accordingly, energy demands during construction would be less than significant.

Operations

Electricity

Once the project is operational, there would be electrical usage from a variety of sources including electricity associated with the TORS, residential, and commercial uses on site, and off-site water treatment and distribution. Electricity transmission for the project site is provided by the Los Angeles Department of Water and Power (LADWP), which serves approximately 3.8 million people and is the nation's largest municipal electric utility.[29] In order to properly assesses and meet growing energy demands, the LADWP releases Integrated Resource Plans. The latest 2017 Final Power Strategic Long-Term Resource Plan, is a comprehensive 20-year roadmap to assist LADWP to meet the growing energy demand from consumers in an environmentally responsible and cost effective manner.[30] LADWP has a net dependable generation capacity greater than 7,531 megawatts (MW).[31] LADWP is fully resourced to meet peak demand but maintains transmission and wholesale marketing operations to keep production costs low and increase system reliability. The LADWP September 2017 forecast indicates that its total energy sales in the 2026-2027 fiscal year when the project would begin operation would be 23,807 gigawatt-hours (GWh).[32] LADWP continues to increase the use of renewable energy to meet customer needs, and has a goal to meet 33 percent renewable energy in December 2020 and 60 percent by December 2030 (in accordance with SB 100 that was adopted in September 2018), utilizing wind, solar, geothermal, and biomass energy sources. As of 2016, which is the most recent year for which data are available, LADWP has achieved 29 percent renewable energy sales. Since 1990, LADWP has divested from three coal plants and repowered thirteen natural gas and oil fueled in-basin generating units using cleaner and more efficient new combustion technology, resulting in 19 percent lower greenhouse gas (GHG) emissions and over 90 percent lower NO_X emissions.[33]

As shown below in Table 6-10, Summary of Estimated Energy Consumption During Project Operation, the estimated annual consumption of electricity would be approximately 3,425,038 kilowatt-hours (kWh). When compared to the LADWP's projected sales in 2026 of 23,807 GWh per year, the project's electricity demand would represent approximately 0.014 percent of total demand. This amount is negligible and is within the anticipated service capabilities of LADWP.

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29 Los Angeles Department of Water & Power (LADWP) (2017), Power Strategic Long-Term Resource Plan. Available at https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=10n2b06q5l_4&_afrLoop=192514895907060. Accessed August 4, 2020.

30 Ibid

31 Ibid

32 Ibid., Appendix A, pg. A-6

33 Ibid

The estimated power requirements for the project is part of the total load growth forecast for the City of Los Angeles and has been taken into account in the planned growth of the City's power system, as confirmed in the will serve letter from LADWP dated January 14, 2019.[34] As discussed above, the project would be required to comply with energy conservation standards pursuant to Title 24 of the California Code of Regulations. The project would also be required to comply with the City of Los Angeles Green Building Code (L.A. Green Building Code), which incorporates by reference the CALGreen Code. The L.A. Green Building Code, effective January 1, 2017, requires the use of numerous conservation measures, beyond those required by Title 24 of the California Code of Regulations.

The L.A. Green Building Code contains both mandatory and voluntary green building measures to conserve energy. Among many requirements, the L.A. Green Building Code requires energy conservation features. Specifically, the residential units would include energy efficient lighting fixtures, Energy Star-rated appliances, low-flow water features, and energy efficient mechanical heating and ventilation systems. The project would also designate 15 percent of the building's roof area as a zone for solar use. Thus, the project would incorporate energy conservation features. In addition, the project would provide 131 Electric Vehicle Ready Parking Spaces including 44 Electric Vehicle Charging Stations. Based on the will serve letter dated January 14, 2019,[35] the LADWP has indicated it has enough capacity to provide electricity to the project site. LADWP states that the estimated power requirement for the project is part of the total load growth forecast for the City and has been considered in the planned growth of the power system.[36] Therefore, the development of the project would not cause wasteful, inefficient or unnecessary consumption of electricity.

TABLE 6-10. SUMMARY OF ESTIMATED ENERGY CONSUMPTION DURING PROJECT OPERATION

Energy Type	Annual Quantity[a]
Electricity (On-Site)	2,908,706 kWh
Electricity (Off-Site)[b]	516,332 kWh
Natural Gas	6.36 MMcf
Gasoline (mobile sources)	131,496 gallons
Diesel (mobile sources)	25,103 gallons

Notes:
[a] Electricity and natural gas values provided represent most conservative energy consumption estimates. These values are based on TORS units modeled as a "Hotel" in CalEEMod compared to a residential dwelling.
[b] Off-site electricity use includes energy needed to pump water and wastewater to and from the project site. Off-site energy is supplied by numerous utilities.
Calculations are provided in Appendix D of this SCEA.
kWh = kilowatt-hours; MMcf = million cubic feet
Source: ICF 2021

Natural Gas

Natural gas for the project site would be provided by Southern California Gas Company (SoCalGas). According to the 2020 California Gas Report Supplement, the annual gas supply

[34] 1111 Hill Street Project Utilities Technical Memorandum. Psomas, August 26, 2021
[35] Ibid
[36] Ibid

delivered by SoCal Gas in 2019 was 2,409 million cubic feet (MMcf)/day.[37] The demand for total natural gas is expected to decrease at an average annual rate of 0.85 percent per year from 2019 to 2035.[38] This decrease is due to modest economic growth, CPUC-mandated energy efficiency (EE) standards and programs, tighter standards created by revised Title 24 Codes and Standards, renewable electricity goals, the decline in commercial and industrial demand, and conservation savings linked to Advanced Metering Infrastructure (AMI). Thus, with the natural gas consumption becoming more efficient and decreasing, the SoCalGas' projection for natural gas also decreases. As shown in Table 6-10, the natural gas consumption as a result of the operation of the project would be approximately 6.36 MMcf per year. This natural gas estimate assumes that no more than 50 percent of the dwelling units would have fireplaces installed, in accordance with PDF-GHG-1 (refer to Section 6.8, *Greenhouse Gas Emissions*). Based on their 2020 California Gas Report, the California Energy and Electric Utilities estimate natural gas capacity within SoCalGas' planning area would be approximately 3,435 MMcf per day in 2026 (the project's opening year).[39] Thus, the project's annual natural gas consumption would represent 0.0005 percent of the 2026 forecasted capacity in SoCalGas' planning area. A will serve letter request was sent to SoCalGas. SoCalGas confirmed that it does have gas facilities within the vicinity of the project. Based on similar projects of this size, there are no service upgrades expected at this time.[40]

As discussed above, the project would be required to comply with energy conservation standards pursuant to Title 24 of the California Code of Regulations. The project would also be required to comply with the L.A. Green Building Code, which has been effective as of January 1, 2017. The L.A. Green Building Code requires the use of numerous conservation measures, beyond those required by Title 24 of the California Code of Regulations. The L.A. Green Building Code contains both mandatory and voluntary green building measures to conserve energy. Therefore, compliance with Title 24 of the California Code of Regulations and the L.A. Green Building Code would reduce the project's energy consumption. Therefore, the development of the project would not cause wasteful, inefficient or unnecessary consumption of natural gas.

Transportation-Related Fuels

Operation of the project would generate vehicle trips associated with people driving to and from their residence or for the TORS and restaurant uses at the project site. Based on the trip generation rates provided in the project Transportation Assessment, it is estimated that operation of the project would result in approximately 4,050,878 vehicle miles traveled (VMT) on an annual basis. It is

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37 California Gas and Electric Utilities, 2020 California Gas Report. Table 32. Available: https://www.socalgas.com/sites/default/files/2020-10/2020_California_Gas_Report_Joint_Utility_Biennial_Comprehensive_Filing.pdf. Accessed: July 19, 2021.

38 California Gas and Electric Utilities, 2020 California Gas Report. Table 32, Table 34. Available: https://www.socalgas.com/sites/default/files/2020-10/2020_California_Gas_Report_Joint_Utility_Biennial_Comprehensive_Filing.pdf. Accessed: July 19, 2021.

39 California Gas and Electric Utilities, 2020 California Gas Report. Table 34. Available: https://www.socalgas.com/sites/default/files/2020-10/2020_California_Gas_Report_Joint_Utility_Biennial_Comprehensive_Filing.pdf. Accessed: July 19, 2021.

40 1111 Hill Street Project Utilities Technical Memorandum. Psomas, August 26, 2021.

estimated that the VMT would result in the annual consumption of approximately 131,496 gallons of gasoline fuel and 25,103 gallons of diesel for project operations.[41]

The project includes conservation measures and design features that would decrease consumption of petroleum-based fuels (gasoline and diesel). The project is a mixed-use development located in a transit priority area, in an infill location close to jobs, residential, government and service uses. In addition, the project would provide 131 Electric Vehicle Ready Parking Spaces including 44 Electric Vehicle Charging Stations. The project would provide bike parking pursuant to the City of Los Angeles Municipal Code (LAMC), including up to 347 bicycle parking spaces (up to 56 short-term and 291 long-term) within the one level of subterranean parking, the ground level, and the second level of above grade parking. As an infill development, the project would replace the existing vacant warehouse building at the site with a more efficient 40-story mixed-use-development. Because of the project site's location near transit service, a number of trips would be expected to be transit or walking/bicycle trips rather than vehicle trips. Some residents would take transit to their destinations or would walk to commercial uses and other services nearby. The expected reduction in vehicle trips would therefore decrease the project's consumption of petroleum-based fuels. As such, the development of the project would not cause wasteful, inefficient or unnecessary consumption of petroleum-based fuels and would promote walking, biking, and other modes of public transportation.

Conclusion

Based on the above impact analysis, the project would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. No mitigation measures would be required.

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

Less Than Significant Impact. Based on the analysis provided below, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. All of the project's energy demands would be served by LADWP and SoCalGas, and comply with the 2019 Title 24 standards, CALGreen Code, and the Los Angeles Green Building Code, as amended to be more stringent than State requirements in LAMC Chapter 9, Article 9. The Los Angeles Green Building Code requires that projects comply with the following requirements related to water efficiency, solid waste reduction, and electric vehicle supply equipment (EVSE):

- Solid Waste Reduction. CALGreen Code Section 4.408.1 imposes mandatory measures for residential projects that require developers to recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste in accordance with either CALGreen Code Sections 4.408.2, 4.408.3 or 4.408.4, or meet a more stringent local construction and demolition waste management ordinance. Diversion efforts would be accomplished through source reduction, recycling, and composting. Finally, the project is required by the California Solid Waste Reuse and Recycling Access Act of 1991 to provide

[41] See Appendix D for detailed calculations.

adequate storage areas for collection and storage of recyclable waste materials. As such, a 65 percent reduction of a project's waste stream to the local landfill would reduce methane emissions and thus lower the project's contribution to global GHG emissions.

- Water Conservation. As mandated by the 2017 Los Angeles Green Building Code, which is based on the 2016 CALGreen Code, the project would be required to provide a schedule of plumbing fixtures and fixture fittings that implement water use reduction by complying with one of the following: (1) a 20% reduction in the building's "water use baseline" as demonstrated in Table 99.04.303.4.1 of Section 4.303.4 of the Los Angeles Building Code; or (2) comply with the maximum flow rates shown in Table 99.04.303.4.2 of the Building Code's Section 4.303.4. The project's water budget for landscape irrigation use shall conform to the California Department of Water's Resources Model Water Efficient Landscape Ordinance (MWELO). Such landscape water reduction methods include, but are not limited to, use of captured rainwater, recycled water, graywater, or water treated for irrigation purposes and conveyed by a water district or public entity. It must also provide irrigation design and controllers that are weather- or soil moisture-based and automatically adjust in response to weather conditions and plants' needs. The project would also comply with the requirements of the City's Low Impact Development (LID) Ordinance, as discussed in Section 6.9, *Hydrology and Water Quality*.

- EVSC. In 2015, the City of Los Angeles amended the Los Angeles Green Building Code to incorporate requirements for the installation of EV charging equipment for new construction. The project would provide 131 Electric Vehicle Ready Parking Spaces including 44 Electric Vehicle Charging Stations. These parking spaces would be consistent with State and City GHG policies to encourage and support alternative clean fuel supplies for vehicles and would further serve to reduce GHG emissions attributable to the vehicle trips generated by the project.

Energy conservation and production measures in the project would decrease overall energy consumption, decrease reliance on non-renewable energy sources, and increase reliance on renewable energy sources at the project site. Construction energy consumption would be a temporary energy expenditure and, as discussed above, would not occur in an inefficient or wasteful manner. Permanent energy saving and sustainable design would be incorporated throughout the project to reduce operational energy uses. The project would emphasize energy and water conservation, which would be achieved through the use of energy efficient heating, ventilating, and air conditioning (HVAC) and lighting systems, and energy star appliances, and low-flow plumbing fixtures. The project would also include a solar zone on 15 percent of the roof area. All of these features would comply with CALGreen, Title 24, and the Los Angeles Green Building Code.

The following provides a discussion of six criteria contained in Appendix F of the State CEQA b Guidelines, which provides guidance to help determine whether a project would result in a significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources.

Criteria 1) The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project's life cycle including construction, operation, maintenance and/or removal. If appropriate, the energy intensiveness of materials may be discussed.

Construction Impacts

Energy use associated with phased construction of the project would consist of diesel fuel consumption by on-road trucks (hauling and vendor trips) and off-road construction diesel equipment, and gasoline consumption by on-road worker vehicles (commute trips). Construction of the project would require the export of asphalt, earth material, and building debris from the project site during the demolition and site clearing phases as well as the delivery of building materials during the building phase.

As the construction phase of the project would be temporary and the fact that the extent of fuel consumption is typical of land use developments of this size and nature, fuel consumption impacts would not be considered a wasteful, inefficient, or unnecessary consumption of energy resources. The proposed mixed-use development is not expected to require a large amount of energy consumption during construction, as may occur with large, industrial facilities (e.g., new power plants or dams). Construction of the project would be temporary and would represent a relatively short demand on local and regional fuel supplies that would be accommodated. During the construction phase, the project would comply with regulatory compliance measures, such as restricting haul trucks to off-peak hours and not allowing engines to idle in excess of 5 minutes when not in use (CARB Air Toxics Control Measure), and meeting specified fuel and fuel additive requirements and emission standards (CCR Title 13, Sec. 2485). Adherence to these measures would increase energy efficiency and reduce consumption of fossil fuels. The energy demands during construction would be typical of construction projects for projects of this size and would not necessitate additional energy facilities or distribution infrastructure or cause wasteful, inefficient or unnecessary consumption of energy. According to the will serve letter, LADWP has indicated it has enough capacity to provide electricity to the project site and LADWP states that the estimated electricity requirement for the project is part of the total load growth forecast for the City and has been considered in the planned growth of the power system.

Accordingly, energy demands during construction would be less than significant.

Operations

Electricity

As discussed above, once the project is operational, there would be electrical usage from a variety of sources including electricity associated with the TORS, residential, and commercial uses on site, and off-site water treatment and distribution.

As shown in Table 6-10, Summary of Estimated Energy Consumption During Project Operation, the estimated annual consumption of electricity would be approximately 3,425,038 kilowatt-hours (kWh). When compared to the LADWP's projected sales in 2026 of 23,807 GWh per year, the project's electricity demand would represent approximately 0.014 percent of total demand. This amount is negligible and is within the anticipated service capabilities of LADWP. The estimated

power requirements for the project is part of the total load growth forecast for the City of Los Angeles and has been taken into account in the planned growth of the City's power system, as confirmed in the will serve letter from LADWP dated April 28, 2020.[42] As discussed above, the project would be required to comply with energy conservation standards pursuant to Title 24 of the California Code of Regulations. The project would also be required to comply with the City of Los Angeles Green Building Code (L.A. Green Building Code), which incorporates by reference the CALGreen Code. The L.A. Green Building Code, effective January 1, 2017, requires the use of numerous conservation measures, beyond those required by Title 24 of the California Code of Regulations. Therefore, compliance with Title 24 of the California Code of Regulations and the L.A. Green Building Code would reduce the project's energy consumption.

Electric Vehicle Charging Stations. Based on the will serve letter dated January 14, 2019,[43] the LADWP has indicated it has enough capacity to provide electricity to the project site. LADWP states that the estimated power requirement for the project is part of the total load growth forecast for the City and has been considered in the planned growth of the power system.[44]

Natural Gas

As shown in Table 6-10, the natural gas consumption as a result of the operation of the project would be approximately 6.36 MMcf per year. As discussed above, the project would be required to comply with energy conservation standards pursuant to Title 24 of the California Code of Regulations. The project would also be required to comply with the L.A. Green Building Code, which has been effective as of January 1, 2017. The L.A. Green Building Code requires the use of numerous conservation measures, beyond those required by Title 24 of the California Code of Regulations. The L.A. Green Building Code contains both mandatory and voluntary green building measures to conserve energy. Therefore, compliance with Title 24 of the California Code of Regulations and the L.A. Green Building Code would reduce the project's energy consumption.

Transportation-Related Fuels

Operation of the project would generate vehicle trips associated with people driving to and from their residence or for the TORS and restaurant uses at the project site. Based on the trip generation rates provided in the project Transportation Assessment, it is estimated that operation of the project would result in approximately 4,050,878 vehicle miles traveled (VMT) on an annual basis. It is estimated that the VMT would result in the annual consumption of approximately 131,496 gallons of gasoline fuel and 25,103 gallons of diesel for project operations.[45]

The project is a mixed-use development located in a transit priority area that is in close proximity to multiple bus stops with high frequency transit service, including buses operated by Metro, LADOT (DASH and Commuter Express), and other municipal transit agencies and in an infill location close to jobs, residential, government and service uses. In addition, the project would provide 131 Electric Vehicle Ready Parking Spaces including 44 Electric Vehicle Charging

[42] 1111 Hill Street Project Utilities Technical Memorandum. Psomas, August 26, 2021

[43] Ibid

[44] Ibid

[45] See Appendix D for detailed calculations.

Stations. The project would provide bike parking pursuant to the LAMC, including up to 347 bicycle parking spaces (up to 56 short-term and 291 long-term) within the one level of subterranean parking, the ground level, and the second level of above grade parking. Because of the project site's location near transit service, a number of trips would be expected to be transit or walking/bicycle trips rather than vehicle trips. The expected reduction in vehicle trips would therefore decrease the project's consumption of transportation-related fuels.

Accordingly, energy demands during operation would be less than significant.

Criteria 2) The effects of the project on local and regional energy supplies and on requirements for additional capacity.

Electricity

The electricity demands during construction would be typical of construction projects of this size and would not necessitate additional energy facilities or distribution infrastructure.

Based on the will serve letter dated January 14, 2019, LADWP has indicated it has enough capacity to provide electricity to the project site. LADWP states that the estimated electricity requirement for operation of the project is part of the total load growth forecast for the City and has been considered in the planned growth of the power system.

As discussed above, there would be electrical usage from a variety of sources including electricity associated with the residential condominiums, TORS units, and commercial uses on-site, and off-site water treatment and distribution. Electricity transmission for the project site is provided by LADWP which serves approximately 3.8 million people and is the nation's largest municipal electric utility.[46] During operation of the project, the estimated annual consumption of electricity would be approximately 3,425,038 kilowatt-hours (kWh). When compared to the LADWP's projected sales in 2026 of 23,807 GWh per year, the project's electricity demand would represent approximately 0.014 percent of total demand.[47]

This amount is negligible and is within the anticipated service capabilities of LADWP. The estimated power requirements for the project is part of the total load growth forecast for the City of Los Angeles and has been taken into account in the planned growth of the City's power system, as confirmed in the will serve letter from LADWP dated January 14, 2019.[48] As discussed above, the project would be required to comply with energy conservation standards pursuant to Title 24 of the California Code of Regulations. The project would also be required to comply with the City of Los Angeles Green Building Code (L.A. Green Building Code), which incorporates by reference the CALGreen Code. The L.A. Green Building Code, effective January 1, 2017, requires the use of numerous conservation measures, beyond those required by Title 24 of the California Code of

[46] Los Angeles Department of Water & Power (LADWP) (2017), Power Strategic Long-Term Resource Plan. Available at https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=10n2b06q5l_4&_afrLoop=192514895907060. Accessed August 4, 2021.

[47] Electricity and natural gas values provided represent most conservative energy consumption estimates. These values are based on TORS units modeled as a "Hotel" in CalEEMod compared to a residential dwelling

[48] 1111 Hill Street Project Utilities Technical Memorandum. Psomas, August 26, 2021

Regulations. Therefore, the project would not adversely affect local and regional electricity supplies or generate a demand for additional capacity during construction or operation. Impacts would be less than significant.

Natural Gas

As discussed in above, the natural gas consumption as a result of the operation of the project would be approximately 6.36 MMcf per year. Based on their 2020 California Gas Report, the California Energy and Electric Utilities estimate natural gas capacity within SoCalGas' planning area would be approximately 3,435 MMcf per day in 2026 (the project's opening year).[49] Thus, the project's annual natural gas consumption would represent 0.0005 percent of the 2026 forecasted capacity in SoCalGas' planning area. A will serve letter request was sent to SoCalGas. SoCalGas confirmed that it does have gas facilities within the vicinity of the project; and accordingly would be able to serve the project site without the need for extensive gas infrastructure improvements.

As discussed above, the project would be required to comply with energy conservation standards pursuant to Title 24 of the California Code of Regulations. The project would also be required to comply with the L.A. Green Building Code. Therefore, compliance with Title 24 of the California Code of Regulations and the L.A. Green Building Code would reduce the project's energy consumption. Additionally, the project would limit natural gas consumption by implementing PDF-GHG-1. Therefore, the project would not necessitate the construction of off-site natural gas facilities or infrastructure improvements that would have the potential to cause significant environmental impacts. Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support project construction activities; thus there would be no demand generated by construction. Therefore, the project would not adversely affect local and regional natural gas supplies or generate a demand for additional capacity during construction or operation. Impacts would be less than significant.

Transportation-Related Fuels

Operation of the project would generate vehicle trips associated with people driving to and from their residence or for the TORS and restaurant uses at the project site. Based on the trip generation rates provided in the project Transportation Assessment, it is estimated that operation of the project would result in approximately 4,050,878 vehicle miles traveled (VMT) on an annual basis. It is estimated that the VMT would result in the annual consumption of approximately 131,496 gallons of gasoline fuel and 25,103 gallons of diesel for project operations.[50]

The project is a mixed-use development located in a transit priority area that is in close proximity to multiple bus stops with high frequency transit service, including buses operated by Metro, LADOT (DASH and Commuter Express), and other municipal transit agencies and in an infill location close to jobs, residential, government and service uses. In addition, the project would

[49] California Gas and Electric Utilities, 2020 California Gas Report. Table 34. Available: https://www.socalgas.com/sites/default/files/2020-10/2020_California_Gas_Report_Joint_Utility_Biennial_Comprehensive_Filing.pdf. Accessed: July 19, 2021.

[50] See Appendix D for detailed calculations.

provide 131 Electric Vehicle Ready Parking Spaces including 44 Electric Vehicle Charging Stations. The project would provide bike parking pursuant to the LAMC, including up to 347 bicycle parking spaces (up to 56 short-term and 291 long-term) within the one level of subterranean parking, the ground level, and the second level of above grade parking. Because of the project site's location near transit service, a number of trips would be expected to be transit or walking/bicycle trips rather than vehicle trips. The expected reduction in vehicle trips would therefore decrease the project's consumption of transportation-related fuels. As the construction phase of the project would be temporary and the fact that the extent of fuel consumption is typical of land use developments of this size and nature, impacts to transportation fuels would not be considered a wasteful, inefficient, or unnecessary consumption of energy resources.

As such, the gasoline consumption associated with the project vehicle trips during both construction and operation would be a negligible amount of oil compared to the total amount of oil supplied to California and sold in the Los Angeles County, and impacts on regional and local supplies would be less than significant.

Criteria 3) The effects of the project on peak and base period demands for electricity and other forms of energy.

As discussed above, the electricity demand, natural gas consumption, and transportation energy consumption would be well within the available regional supplies and overall capacity of LADWP, SoCalGas, and California refineries, respectively. The projects energy demand and consumption are negligible compared to available supplies during both construction and operation. With regard to peak electricity load conditions, LADWP's 2017 Power Strategic Long-Term Resource Plan stated the LADWP power system experienced an all-time high peak of 6,432 MW on August 31, 2017.[51] LADWP also estimates a peak load based on two years of data known as base case peak demand to account for typical peak conditions. Based on LADWP estimates for 2026-2027 (closest forecasted year to first project operational year), the base case peak demand for the power grid is 6,129 MW. Under peak conditions, the project would consume approximately 3,425,038 kWh on an annual basis which, assuming 12 hours of active electricity demand per day, would be equivalent to approximately 782 kW (peak demand assuming 4,380 hours per year of active electricity demand). In comparison to the LADWP power grid base peak load of 6,129 MW for 2026-2027, based on the assumption above, the proposed project would represent approximately 0.01 percent of the LADWP base peak load conditions. Therefore, proposed project electricity consumption during operational activities would have a negligible effect on peak load conditions of the power grid.

With regard to peak day natural gas demand, the 2020 California Gas Report estimates for 2026 (proposed project first operational year), the extreme peak demand for the SoCalGas service area is 2,782 million cubic feet per day.[52] Under average conditions, the proposed project would consume approximately 530,295 cf/month. As a conservative estimate for estimating peak demand, it is assumed the yearly natural gas usage only occurs during three months (90 days) of the year,

[51] LADWP. 2017. LADWP Power Strategic Long-Term Resource Plan. December.
[52] California Gas and Electric Utilities. 2020 California Gas Report.

during the winter months. This results in a monthly peak natural gas usage of 2,121,178 cf per month or approximately 23,569 cf per day (conservatively assuming natural gas usage would only occur during the winter months). In comparison to the CEC extreme peak day demand of 2,782 million cf per day for 2026, based on the assumption above, the project would represent 0.001 percent of SoCalGas' forecasted extreme peak day demand. Therefore, project natural gas demand during operational activities would have a negligible effect on peak demands of the natural gas supplies.

Criteria 4) The degree to which the Project complies with existing energy standards

Based on the analysis provided above, the project would comply with existing energy standards. All of the project's energy demands would be served by LADWP and SoCalGas, and comply with the 2019 Title 24 standards, CALGreen Code, and the Los Angeles Green Building Code, as amended to be more stringent than State requirements in LAMC Chapter 9, Article 9. The Los Angeles Green Building Code requires that projects comply with the following requirements related to water efficiency, solid waste reduction, and electric vehicle supply equipment (EVSE). Therefore, project would comply with all existing construction and operational energy standards that are applicable to the project, and impacts would be less than significant.

Criteria 5) The effects of the project on energy resources.

Construction

As previously described, LADWP's electricity generation is supplied from a variety of nonrenewable and renewable sources, such as coal, natural gas, solar, geothermal, wind, and hydropower. Construction of the project would generate a temporary demand for electricity use. As the construction phase of the project would be temporary, the proposed mixed-use development is not expected to require a large amount of electric energy consumption during construction.

Operations

Electricity

As discussed above, once the project is operational, there would be electrical usage from a variety of sources including electricity associated with the TORS, residential, and commercial uses on site, and off-site water treatment and distribution.

As discussed above, when compared to the LADWP's projected sales in 2026 of 23,807 GWh per year, the project's electricity demand would represent approximately 0.014 percent of total demand. This amount is negligible and is within the anticipated service capabilities of LADWP. The estimated power requirements for the project is part of the total load growth forecast for the City of Los Angeles and has been taken into account in the planned growth of the City's power system, The project would be required to comply with energy conservation standards pursuant to Title 24 of the California Code of Regulations. The project would also be required to comply with the L.A. Green Building Code, which incorporates by reference the CALGreen Code. The L.A. Green Building Code, effective January 1, 2017, requires the use of numerous conservation measures, beyond those required by Title 24 of the California Code of Regulations.

Natural Gas

As shown in Table 6-10, the natural gas consumption as a result of the operation of the project would be approximately 6.36 MMcf per year. As discussed above, the project would be required to comply with energy conservation standards pursuant to Title 24 of the California Code of Regulations. The project would also be required to comply with the L.A. Green Building Code, which has been effective as of January 1, 2017. The L.A. Green Building Code requires the use of numerous conservation measures, beyond those required by Title 24 of the California Code of Regulations. The L.A. Green Building Code contains both mandatory and voluntary green building measures to conserve energy. Therefore, compliance with Title 24 of the California Code of Regulations and the L.A. Green Building Code would reduce the project's energy consumption.

Transportation-Related Fuels

Operation of the project would generate vehicle trips associated with people driving to and from their residence or for the TORS and restaurant uses at the project site. Based on the trip generation rates provided in the project Transportation Assessment, it is estimated that operation of the project would result in approximately 4,050,878 vehicle miles traveled (VMT) on an annual basis. It is estimated that the VMT would result in the annual consumption of approximately 131,496 gallons of gasoline fuel and 25,103 gallons of diesel for project operations.[53]

The project is a mixed-use development located in a transit priority area that is in close proximity to multiple bus stops with high frequency transit service, including buses operated by Metro, LADOT (DASH and Commuter Express), and other municipal transit agencies and in an infill location close to jobs, residential, government and service uses. In addition, the project would provide 131 Electric Vehicle Ready Parking Spaces including 44 Electric Vehicle Charging Stations. The project would provide bike parking pursuant to the LAMC, including up to 347 bicycle parking spaces (up to 56 short-term and 291 long-term) within the one level of subterranean parking, the ground level, and the second level of above grade parking. Because of the project site's location near transit service, a number of trips would be expected to be transit or walking/bicycle trips rather than vehicle trips. The expected reduction in vehicle trips would therefore decrease the project's consumption of transportation-related fuels.

Therefore, the effects of the project on energy resources would be less than significant.

Criteria 6) The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

As discussed previously, the project site is located in an infill area in a highly urbanized location that is supported by regional and local transit services that would encourage alternative modes of transportation and a reduction in overall VMT. The project would increase density, location efficiency, and follow many of the Land Use measures outlined in the Transportation Category in the California Air Pollution Control Officers Association's guidance measures. The project would support statewide efforts to improve transportation energy efficiency through its classification as an infill location close to shopping centers and other destinations. The project is located in an urban

[53] See Appendix D for detailed calculations.

infill location, within the Central City Community Plan, which has nearby access to shops, restaurants, offices, and other services. This is consistent with the State's overall goals to reduce VMT as outlined in the 2020-2045 RTP/SCS for the region, which seeks improved access and mobility by focusing new growth around transit, growth around "Priority Growth Areas," and providing more options for short trips. The project site is served by public transportation options, including multiple bus stops with high frequency transit service, such as those operated by Metro, LADOT (DASH and Commuter Express), and other municipal transit agencies, as well as the Metro A (Blue) Line and Metro E (Expo) Line and the planned Los Angeles Streetcar.

As such, the project would promote alternate modes of transportation and reduce its reliance on transportation energy and impacts would be less than significant.

As demonstrated in the analysis of the six criteria discussed above, the project would not result in wasteful, inefficient, or unnecessary consumption of energy during construction or operation. The project demands on electricity, natural gas, and transportation energy would not significantly affect local and regional supplies or capacity. The project's energy usage during base and peak periods would be consistent with electricity and natural gas future projections for the region. Electricity generation capacity and supplies of natural gas and transportation fuels would be sufficient to meet the needs of project-related construction and operational activities. Additionally, the project would comply with all energy conservation standards applicable to the project. In summary, the project's energy demands would not significantly affect available energy supplies and would comply with existing energy efficiency standards. Therefore, the project would not cause wasteful, inefficient, and unnecessary consumption of energy during the construction and operation, and impacts with respect to energy consumption would be less than significant.

Cumulative Impacts

Energy

Development of the project in conjunction with the related projects could cumulatively increase electricity, natural gas, and transportation-related fuel consumption. There are 35 related projects located within the vicinity of the project site. The geographic context for the cumulative impacts analysis regarding electricity is LADWP's service area and the geographic context for the cumulative impacts analysis regarding natural gas is SoCalGas' service area. With respect to the geographic context for the cumulative impacts analysis regarding transportation-related fuel, for the purpose of this analysis the project's potential cumulative impacts are assessed in the context of County-wide consumption.

Electricity

As discussed previously, LADWP forecasts that its total energy sales in the 2026–2027 fiscal year will be 23,807 GWh of electricity. Based on the project's estimated new electrical consumption of 3,425,038 kWh/year, the project would account for approximately 0.014 percent of LADWP's total projected sales, and thus its supplies, in the project's opening year. Thus, the project would result in the use of renewable and non-renewable electricity resources on a relatively small scale. Additionally, the project would include energy conservation features, including energy efficient lighting fixtures, ENERGY STAR-rated appliances, low-flow water features, and energy efficient

mechanical heating and ventilation systems for the up to 319 residential condominium units and 160 TORS units. As with the project, the other future related projects would also be expected to incorporate energy conservation features, comply with applicable regulations (e.g., anti-idling vehicle regulations during construction), the 2019 Title 24 standards and CALGreen code, the Los Angeles Green Building Code, and incorporate mitigation measures, as necessary. Each of the related projects would be reviewed by LADWP to identify necessary power facilities and service connections to meet their respective needs. Thus, use of electricity resources by cumulative development in the project area would be reduced by conservation features and measures that would be implemented by each individual development project and by state measures requiring LADWP to obtain more of its supplies from renewable resources. Overall, development of the project and related projects would not result in the wasteful, inefficient and unnecessary use of electricity, and cumulative impacts would be less than significant.

Natural Gas

As discussed previously, based on the 2020 California Gas Report, the California Energy Commission estimates natural gas capacity within SoCalGas' planning area will be approximately 3,435 million cubic feet per day in 2026 (the project's opening year). The project, which would be required to comply with energy conservation standards pursuant to Title 24 of the California Code of Regulations and the Los Angeles Green Building Code, would account for approximately 0.0005 percent of the 2026 forecasted consumption in SoCalGas' planning area. Thus, the project would result in the use of natural gas resources on a relatively small scale. As with the project, the related projects would also be expected to incorporate energy conservation features, comply with applicable regulations including the 2016 Title 24 standards and CALGreen code and the Los Angeles Green Building Code. In addition, development projects within SoCalGas' service area, including the project and related projects, would also be anticipated to incorporate site-specific infrastructure improvements, as appropriate. Therefore, although development of the project and related projects would result in the use of natural gas resources, the use of such resources would not occur in a manner that is considered to be wasteful, inefficient, and unnecessary. Cumulative impacts associated with natural gas use by the project and related projects would be less than significant.

Transportation Energy

As shown in Table 6-9, it is estimated that the project would result in the annual consumption of approximately 131,496 gallons of gasoline fuel and 25,103 gallons of diesel during operations. Based on reported data collected by retail transportation fueling stations on gasoline and diesel fuel sales in California, the amount of gasoline and diesel sales in 2019 for Los Angeles County was approximately 3,559 million gallons and 575 million gallons, respectively. As such, the annual transportation-related fuel usage for the project would represent approximately 0.004 percent and 0.004 percent of Los Angeles County's 2019 annual on-road gasoline- and diesel-related energy consumption.

As discussed previously, the project includes conservation measures and design features that would decrease consumption of petroleum-based fuels, including its location within an identified TPA. The mixed-used nature of the project and its urban infill location in proximity to public transit

options would reduce VMT by encouraging use public transit (as opposed to passenger vehicle trips) and walking by residents. The project would provide 131 Electric Vehicle Ready Parking Spaces including 44 Electric Vehicle Charging Stations. In addition, the project would provide bike parking pursuant to the LAMC, including up to 347 bicycle parking spaces (up to 56 short-term and 291 long-term) within the one level of subterranean parking, the ground level, and the second level of above grade parking. As such, the development of the project would not cause wasteful, inefficient or unnecessary consumption of petroleum-based fuels and would promote walking, biking, and other modes of public transportation. As with the project, other related projects would also be expected to reduce VMT by encouraging the use of alternative modes of transportation and other design features that promote VMT reductions consistent with applicable provisions of the SCAG 2020-2045 RTP/SCS for the land use type. Each related project would need to demonstrate consistency with State and regional goals for reducing VMT and, where necessary, would need to incorporate project design features or mitigation measures as required under CEQA to achieve consistency with these goals. Additionally, the consumption of transportation-related fuels by the project and related projects would also be minimized over time due to improvements to vehicle fuel economy or passenger vehicles pursuant to federal and State regulations. Thus, development of the project and related projects would not result in a cumulatively considerable impact related to the consumption of transportation-related fuels. This cumulative impact would be less than significant.

Conclusion

The project's contribution to cumulative impacts related to energy consumption would be less than significant and would not be cumulatively considerable.

6.7 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 potential substantial adverse effects, including the risk of loss, injury, or death involving:				
	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.	☐	☐	☒	☐
	Strong seismic ground shaking?	☐	☐	☒	☐
	Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
	Landslides?	☐	☐	☐	☒
b.	Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
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 an onsite or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
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 wastewater disposal systems in areas where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

The following discussion of Geology and Soils is based, in part, on the technical report for the project, titled the *Preliminary Site Geotechnical and Geologic Assessment Report for Proposed 40-Story Hi-Rise Mixed-Use Development Project 1101-1115 S. Hill Street and 206-210 W. 11th Street, Los Angeles, California* (Geotechnical Investigation) dated August 16, 2021, prepared by AECOM (Appendix E). The Geotechnical Investigation also incorporates information provided in a prior geotechnical investigation for the project site titled *Report of Geotechnical Investigation Services, Mixed-Use Development Proposed Project, 1111 South Hill Street, City of Los Angeles*, dated July 31, 2015, prepared by AECOM. The 2015 geotechnical investigation included field explorations and drilling of four exploratory borings. The following discussion of paleontological resources is based on the *Cultural and Paleontological Resources Assessment Report* prepared by ICF in December 2021 in Appendix C.

Would the project:

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

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

Less Than Significant Impact. As described in the Geotechnical Investigation, based on a review of the map of Earthquake Zones of Required Investigation for the Hollywood Quadrangle, the project site is not located within an Alquist-Priolo Earthquake Fault Zone as defined by the State of California. The closest Alquist-Priolo-zoned faults to the project site are the Hollywood Fault approximately 5.1 miles to the north and the Newport-Inglewood fault zone approximately 5.7 miles to the west to southwest. There are no active faults delineated by California Geological Survey that have been recognized as crossing or projecting toward the project site. As concluded in the Geotechnical Investigation, there are no active or potentially active faults close enough to the project site to produce fault rupture or surface displacement at the project site. The project would not contain uses or activities that would exacerbate the activity of a known earthquake fault.

Conclusion

The project would not directly or indirectly cause potential substantial impacts from fault rupture that could potentially cause direct or indirect adverse effects. Impacts are less than significant, and no mitigation measures are required.

ii. Strong seismic ground shaking?

Less Than Significant Impact. A significant impact would occur if the project would exacerbate the risk of personal injury or death or property damage as a result of seismic ground shaking. The entire Southern California region is susceptible to strong ground shaking from severe earthquakes. Strong ground motion occurs as energy is released during an earthquake. The intensity of ground motion is dependent upon the distance to the fault rupture, the earthquake magnitude, and the geologic conditions underlying and surrounding the site. Seismic ground shaking will induce kinematic and inertia loads to the proposed structures for the project.

The Los Angeles Basin, as well as most of Southern California, is located within a complex zone of faults and folds resulting from compressional forces occurring along a bend within the boundary between the Pacific and North American tectonic plates. Numerous generally east-west to northwest trending faults have formed as a result of these north-south compressional forces acting within this area.

A number of moderate to large earthquakes in the region have also occurred on deep-seated buried thrust faults in this geological complex region of Southern California. The most recent significant earthquake was the magnitude 6.7 Northridge earthquake (1994), which occurred on a shallowly south-dipping thrust fault that underlies much of the San Fernando Valley. The 1971 San Fernando

earthquake had a moment magnitude of 6.4 that involved surface rupture and occurred on a northerly dipping thrust fault that dips from the northern side of the San Fernando Valley. Other significant earthquakes that produced significant shaking include the 1987 magnitude 5.9 (Mw) Whittier earthquake, and the 1933 magnitude 5.5 (Mw) Long Beach earthquake.

Several major faults within the near vicinity of the project site are characterized by a combination of blind thrusting, right-lateral strike-slip, and reverse faulting and are described in more details in the following subsections. These major faults are described below.

Puente Hills Blind Thrust

The Los Angeles segment of the Puente Hills Blind Thrust fault lies directly beneath downtown Los Angeles and in the near-vicinity (0.35 mile) of the project site. The Puente Hills Blind Thrust fault is not exposed at the ground surface and does not present a potential for surface fault rupture. However, based on deformation of late Quaternary age sediments above, this fault is considered an active fault capable of generating future earthquakes beneath the Los Angeles Basin. An average slip rate of 0.7 millimeter per year and a maximum earthquake magnitude of 6.92 are estimated using the Leonard 2010 magnitude-area scaling relations.

Elysian Park Thrust

The Elysian Park Thrust consists of a series of shallowly north and northeast-dipping blind thrusts that extend from Orange County through downtown Los Angeles and westward beneath the Santa Monica Mountains. Elysian Park Thrust is located approximately 0.82 miles from the project site. The thrust system is not exposed at the surface but is buried under the unconsolidated alluvial sediments of the Los Angeles Basin. These subsurface thrust faults are capped and structurally reflected at the surface known as the Elysian Park anticline. Recent studies suggest that the fault experiences an average slip rate of 1.5 millimeter per year and is capable of producing a Magnitude 6.7 earthquake.

San Vicente Fault

The San Vicente blind fault is located in the northern Los Angeles fault system and extends through the Salt Lake oil fields is an early to late Miocene age extensional north-dipping normal fault. In the early Pliocene contraction of the Los Angeles Basin began resulting in the reactivation of normal faults with the initiation of monoclinal and secondary compressional structures. The San Vicente Fault is approximately 2.98 miles from the project site.

The San Vicente blind fault is believed to account for approximately 20 percent of the structural relief in the northern Los Angeles shelf. Deformation modeling based on the length and thickness of growth strata suggests the northern Los Angeles fault system is growing at a reverse slip rate of 1.5 to 1.9 millimeters per year.

Hollywood Fault

The 15-kilometer-long Hollywood fault is just south of the faceted ridges and bedrock outcrops of the south margin of the eastern Santa Monica Mountains along Sunset Boulevard and is approximately 5.23 miles from the project site. Studies by several investigators have indicated that

the fault is active, based on geomorphic evidence, stratigraphic correlation between exploratory borings, and fault trenching studies. Although it is considered to be a Holocene fault (indicating displacement within the past 10,000 years), the Hollywood fault has not produced any moderate or large earthquakes in the historical record.

Newport-Inglewood Fault Zone

The Newport-Inglewood fault zone (NIFZ) is about 47 miles long and consists of a series of right lateral strike-slip faults that trends northwest-southeast forming an alignment of hills from Newport Mesa to Cheviot Hills along the western side of the Los Angeles Basin. It is approximately 6.33 miles from the project site. The NIFZ is characterized at the surface by a belt of domal hills and mesas formed by the folding and faulting of thick sequences of Pleistocene age sediments and Tertiary age sedimentary rocks. The fault was the source of the 1933 Long Beach earthquake (M 6.4). The recurrence interval is estimated on the order of a thousand years or more. The NIFZ produced the 1933 Long Beach event that had a moment magnitude (Mw) of about 6.4.

Potential impacts related to seismic ground shaking can be reduced to less than significant through appropriate ground motion analysis, regulatory compliance, and project structural design. RCM-GEO-1 requires that a Final Geotechnical Report would be prepared for the project site that would specify exact design specifications that would reduce any potential impacts to seismic hazards. The Final Geotechnical Report would be submitted to the City of Los Angeles Department of Building and Safety (LADBS) for review prior to issuance of a grading permit. RCM GEO-2 requires that the project would include structural recommendations using the Los Angeles Tall Buildings Structural Design Council 2001 edition, *An Alternative Procedure for Seismic Analysis and Design of Tall Buildings Located in the Los Angeles Region*. The project would also conform to the current seismic design provisions of the City's Building Code, which incorporates the latest seismic design standards for structural loads and materials to accommodate maximum ground accelerations expected from known faults in the vicinity of the project site. Potential impacts related to seismic ground shaking would be less than significant through appropriate ground motion analysis and adherence to regulatory compliance measures including RCM GEO-1 and RCM GEO-2.

Conclusion

With compliance with applicable regulatory requirements, the project would not directly or indirectly cause potential substantial impacts related to strong seismic ground shaking. Impacts would be less than significant, and no mitigation measures are required.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is a phenomenon whereby saturated, granular soils lose their inherent shear strength due to excess pore water pressure build-up, such as that generated during repeated cyclic loading from an earthquake. A low relative density and loose consistency of the granular materials, shallow ground-water table, long duration and high acceleration of seismic shaking are some of the factors favorable to cause liquefaction.

As noted in the Geotechnical Investigation, the project site is not within a liquefaction zone area. Due to the dense to very dense native soils and the depth to historical high groundwater greater

than 100 feet, the potential for liquefaction is considered remote at the project site. However, sporadic groundwater seepage within a sandy zone perched on a silty or clayey soil layer has been reported from nearby excavations. Therefore, minor perched groundwater seepage between approximate depths of 25 and 40 feet bgs could be anticipated during construction.[54] However, it is anticipated that the perched groundwater would dissipate relatively quickly, once encountered, and permanent dewatering is not anticipated.[55]

The project site has very low susceptibility of liquefaction, and seismic related ground failure, including liquefaction would be less than significant. The project would not contain uses or activities that would exacerbate existing environmental conditions.

Conclusion

The project would not directly or indirectly cause potential substantial impacts related to ground failure or liquefaction. Impacts would be less than significant, and no mitigation measures are required.

iv. Landslides?

No Impact. Landslide potential is generally the greatest for areas with steep and/or high slopes, low sheer strength, and increased water pressure. The project site is located in a relatively flat, low-lying sediment-filled plain. As noted in the Geotechnical Investigation, the project site is not located within areas designated by the California Geological Survey where previous occurrence of landslide movement or local topographic, geological, geotechnical and subsurface conditions indicate a potential for permanent ground displacement to the event that mitigation would be required. The project would not contain uses or activities that would exacerbate existing environmental conditions.

Conclusion

The project would not directly or indirectly cause potential substantial impacts related to landslides. No impact would occur, and no mitigation is required.

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

Less Than Significant Impact. The project site is currently developed with a warehouse that has been vacant since approximately 2013. There are only a few tree wells within the adjacent sidewalks and no areas of landscaping within the project site. Project construction would involve ground-disturbing activities (e.g., excavation, grading, and foundation construction) that would expose soils for a limited time and allow for possible erosion.

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[54] Preliminary Site Geotechnical and Geologic Assessment Report for Proposed 40-Story Hi-Rise Mixed-Use Development Project 1101-1115 S. Hill Street and 206-210 W. 11th Street, Los Angeles, California, August 16 2021, prepared by AECOM.

[55] Preliminary Site Geotechnical and Geologic Assessment Report for Proposed 40-Story Hi-Rise Mixed-Use Development Project 1101-1115 S. Hill Street and 206-210 W. 11th Street, Los Angeles, California, August 16, 2021, prepared by AECOM.

However, the potential for erosion would be reduced by implementation of required regulatory erosion controls imposed during site preparation and grading activities. Specifically, all grading activities would require grading permits from the LADBS, which would include requirements and standards designed to limit potential impacts associated with erosion. In addition, on-site grading and site preparation would be required to comply with all applicable provisions of Chapter IX, Article 1, Division 70 of the LAMC, which address grading, excavations, and fills. This LAMC division requires that all grading activities occur in accordance with grading permits issued by LADBS. The permits typically require that excavation and grading activities be scheduled during dry weather periods. Should grading activities occur during the rainy season (October 1 to April 14), a Wet Weather Erosion Control Plan must be prepared pursuant to the "Manual and Guideline for Temporary and Emergency Erosion Control," adopted by the Los Angeles Board of Public Works. The Wet Weather Erosion Control Plan would include measures such as diversion dikes to channel runoff around the project site. Division 70 also requires that stockpiles, excavated, and exposed soil be covered with secured tarps, plastic sheeting, erosion control fabrics, or treated with a bio-degradable soil stabilizer. A deputy grading inspector is required to be on-site during grading operations to ensure adhered to applicable regulations.

Following the completion of construction, the potential for erosion would be relatively low due to the fact that the project site would be largely impervious and include drainage control features. The use of hardscape and landscape plantings would act as an effective barrier to soil erosion by impeding direct contact between precipitation/irrigation and on-site soils.

With conformance with applicable regulations and required drainage control features, impacts regarding wind or waterborne erosion during construction and operation of the project would be less than significant.

Conclusion

The project would not directly or indirectly cause potential substantial impacts related to soil erosion or the loss of topsoil. Impacts would be less than significant, and no mitigation is required.

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

Less Than Significant

Lateral Spreading

Lateral spreading results from earthquake-induced liquefaction, causing landslides associated with gentle slopes that flow laterally, like water. Land subsidence is a gradual settling or sudden sinking of the Earth's surface and can occur when large amounts of groundwater have been withdrawn from certain types of sediments, causing the land to subside. Therefore, considering the relatively flat topography and low potential for liquefaction at the project site, the potential for lateral spreading at the project site is considered less than significant.

Subsidence

The extraction of water or petroleum from sedimentary source rocks can cause the permanent collapse of pore space previously occupied by the removed fluid. The compaction of subsurface sediment caused by fluid withdrawal would cause subsidence of the ground surface overlying a pumped reservoir. If the volume of water or petroleum is sufficiently great, the amount of resulting subsidence may be sufficient to damage nearby engineered structures.

The project site is located within the Los Angeles Downtown Oil Field Zone. As noted in the Geotechnical Investigation, although a detailed study has not been performed it is anticipated that the current minor extractions from remaining wells within the oil field would not result in measurable subsidence at the project site, barring a significant increase in extraction in the future. The magnitude is expected to be relatively small and distributed over a broad area and should not adversely affect the proposed construction. Therefore, the potential for subsidence is not considered a significant geologic hazard to the project. Moreover, the project construction is not expected to cause any subsidence to adjacent properties. There are no known or suspected compressible soil layers below and adjacent to the foundation level that would be susceptible to consolidation settlement due to the project loading conditions. Also, the project excavations will not require any active dewatering due to the depth to groundwater.

Compressible Soils

Artificial fill and near-surface alluvial deposits may be compressible, particularly with the addition of water. Where present, these materials may be subject to load-induced settlement and are not suitable for support of foundations, slabs-on-grade, paving or new compacted fills. The construction of the one-level subterranean parking garage would remove approximately 20 to 25 feet of existing soils plus an additional deepening to 45 feet bgs below the subterranean parking or the fire water storage tank. These excavation depths would remove all the near-surface fill and compressible soils and the subgrade soils at and below those planned excavation depths are generally dense to very dense and stiff to very stiff. Therefore, the potential for compressible soil hazards at the project site is considered less than significant.

Collapsible Soils

Collapsible soils undergo settlement upon wetting, even without the application of additional load. Water weakens or destroys the bonds between soil particles and severely reduces the bearing capacity of the soil. Typical collapsible soils are lightly colored, with low plasticity and relatively low densities.

As noted in the Geotechnical Investigation, , the alluvial soils at depths of 20 to 25 feet bgs and at depths greater 45 feet bgs predominantly consist of very dense silty sand, poorly graded sand with silt and gravel, sandy silt, well-graded sand with gravel and stiff to very stiff silty clay and lean clay. Therefore, as noted in the Geotechnical Investigation, the potential impacts due to collapsible soils are expected to be less than significant.

Corrosive Soils

Based on the results of corrosion tests from the previous soil investigations within the near-vicinity of the project site, the top 5 feet of surface soils and the soil at 20 to 25 feet bgs are moderately corrosive to corrosive to ferrous metals, and sulfate attack to exposed concrete is considered moderate corrosive to negligible. Therefore, the soils at the project site are likely to exhibit similar corrosive properties. To reduce risks of corrosive soil conditions, as part the project's design, building materials should utilize concrete that is resistant to sulfate exposure. Corrosion protection for metals may be needed for underground foundations or structures in areas where corrosive groundwater or soil could potentially cause deterioration. As described in PDF GEO-1, these design and construction features and elements would be incorporated into the project's design and impacts due to corrosive soil would be less than significant. The reinforced concrete mix design would be performed following the latest building code and LAMC requirements during the design phase and would be reviewed and approved by LADBS. With implementation of PDF GEO-1 and regulatory requirements, impacts due to corrosive soils are less than significant.

Conclusion

The project would not directly or indirectly cause potential substantial impacts related to lateral spreading, landslides, subsidence, liquefaction, or collapse. Impacts on corrosive soils would be less than significant with incorporation of PDF GEO-1.

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

No Impact. Expansive soils are fine-grained soils that can undergo a significant increase in volume with an increase in water content and a significant decrease in volume with a decrease in water content. Changes in the water content of an expansive soil can result in severe distress to structures constructed upon the soil.

As noted in the Geotechnical Investigation, within the near vicinity of project site, majority of soils are sandy materials which consists of medium dense to very dense silty sand, poorly graded sand with silt and gravel, and well-graded sand with gravel and cobble. There are isolated interbedded clayey layers consisting of stiff to hard lean clay that may have a medium expansion potential. The project would have different foundation levels at approximately 20 to 25 feet bgs and at 45 feet bgs and it is anticipated the foundation subgrade at these depths would consist of sand, silty sand, silt and clay. With proper foundation design and adherence to applicable provisions of the City's Building Code, the potential for expansive soil hazard at the project site is low. The project would not contain uses or activities that would exacerbate existing environmental conditions.

Conclusion

No impact would occur related to substantial risk to life or property that could potentially cause direct or indirect adverse impacts as a result of expansive soils.

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?

No Impact. The project site is located in a highly urbanized area, where wastewater infrastructure is currently in place. The project would connect to existing sewer lines that serve the project site and would not use septic tanks or alternative waste disposal systems.

Conclusion

No impact that could potentially cause direct or indirect adverse effects would occur and no mitigation is required.

Regulatory Compliance Measures

RCM GEO-1: A final, design level, geotechnical, geologic and seismic hazard investigation report that complies with all applicable state and local code requirements shall be prepared by a California-registered geotechnical engineer and shall be submitted to the LADBS. The final geotechnical, geologic and seismic hazard investigation report would specify exact design coefficients, as well as the type and sizing of structural building materials, site preparation requirements, and foundation design requirements; and demonstrate that construction procedures would meet the established performance standards.

The site-specific geotechnical report shall be prepared to the written satisfaction of LADBS and shall address each of the recommendations identified in the Preliminary Site Geotechnical and Geologic Assessment Report for Proposed 40-Story High-Rise Mixed-Use Development Project 1101-1115 S. Hill Street and 206-210 W. 11th Street, Los Angeles, California, prepared by AECOM, dated August 16, 2021.

RCM GEO-2: The proposed tower would be designed using the Los Angeles Tall Buildings Structural Design Council 2001 edition, "An Alternative Procedure for Seismic Analysis and Design of Tall Buildings Located in the Los Angeles Region." With this design approach, a site-specific ground motion based on the latest seismic design standard would be developed for the project's structural design.

Project Design Features

PDF GEO-1*:* The project shall provide corrosion protection for metals in areas where corrosive groundwater or soil could potentially cause deterioration. Corrosion protection techniques could include epoxy and metallic protective coatings, the use of alternative (corrosion resistant) materials, and selection of the appropriate type of cement and water/cement ratio. The reinforced concrete mix design shall be performed following the latest Building Code regulations. Specific measures to reduce the potential effects shall be developed in the design phase to reduce impacts related to corrosive soils to low levels and shall be approved by the Los Angeles Department of Building and Safety.

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

Less Than Significant Impact with Mitigation Incorporated. The following discussion of paleontological resources is based on the Cultural and Paleontological Resources Assessment Report prepared by ICF (Appendix C). The Cultural and Paleontological Resources Assessment Report included a review of the Geotechnical Report and a fossil localities search requested by ICF from the Natural History Museum of Los Angeles County (NHMLAC) on April 17, 2020, for the project area. The NHMLAC responded on April 21, 2020, indicating that it had no recorded fossil localities in the project footprint.

The project site is underlain by deposits composed of younger Quaternary Alluvium, derived as overbank deposits from the flood plain of the Los Angeles River that currently flows in a concrete channel approximately 1.8 miles to the east. While there are no recorded fossil localities on the project site, fossil specimens have been encountered in the immediate vicinity of the project. LACM 1755 is a vertebrate fossil locality from older Quaternary deposits, south of the project site near the intersection of Hill Street and 12th Street, that produced a fossil specimen of horse, *Equus*, at a depth of 43 feet below the street. Another vertebrate fossil locality, near Gramercy Place, which is approximately 3 miles west of the project site, produced fossil specimens of mammoth, *Mammuthus*, and bison, *Bison antiquus*.

The NHMLAC advised that deeper excavations in the proposed project area that extend down into older Quaternary sediments may encounter significant vertebrate fossils. The excavations associated with the project are expected to reach a maximum depth of approximately 45 feet, which could be well beyond the deeper younger Quaternary Alluvium deposits. In addition, the presence of vertebrate fossil localities immediately south of the project site raises the paleontological sensitivity of the area. Therefore, impacts to paleontological fossils could be significant. Therefore, it is recommended that mitigation measure MM-GEO-1 be implemented, which would reduce potentially significant unforeseen impacts to paleontological resources to a less than significant level.

Mitigation Measures

MM-GEO-1: Conduct Paleontological Resource Monitoring.

A qualified paleontologist shall review the paleontological records search prepared by the Los Angeles County Natural History Museum and review existing literature for the proposed project area. The following additional measures shall be designed to recover remains before they are lost or destroyed.

- All ground-disturbing activities associated with project construction occurring within previously undisturbed fossil bearing formations shall be monitored by a qualified paleontologist or qualified paleontological monitor. A qualified paleontologist is defined as an individual with an M.S. or Ph.D. in paleontology or geology who is familiar with paleontological procedures and techniques, who is knowledgeable in the geology and paleontology of Los Angeles County, and who has worked as a paleontological monitoring project supervisor in the County for at least 1 year. A paleontological monitor is defined

as an individual who has experience in the collection and salvage of fossil materials, and works under the direction of a qualified paleontologist.

- A qualified paleontologist shall attend preconstruction meetings to consult with the grading and excavation contractors concerning excavation schedules, paleontological field techniques, and safety issues. In addition, all on-site construction personnel shall receive Worker Education and Awareness Program (WEAP) training prior to the commencement of excavation work.
- If fossils are discovered, the paleontologist (or paleontological monitor) shall recover them. In most cases, this fossil salvage can be completed in a short period of time; however, some fossil specimens, such as a complete large mammal skeleton, may require an extended salvage period. In these instances, the paleontologist (or paleontological monitor) shall be allowed to temporarily direct, divert, or halt grading to allow recovery of fossil remains in a timely manner. Because of the potential for the recovering of small fossil remains, such as isolated mammal teeth, it may be necessary to set up a screen-washing operation on site.
- Fossil remains collected during the monitoring and salvage portion of the program shall be cleaned, repaired, sorted, and catalogued.
- Prepared fossils, along with copies of all pertinent field notes, photos, and maps, shall be deposited (as a donation) in a scientific institution with permanent paleontological collections, such as the NHMLAC.
- A final data recovery report shall be completed that outlines the results of the monitoring program. This report shall include discussions of the methods used, stratigraphic section(s) exposed, fossils collected, and significance of recovered fossils.

Conclusion

With implementation of MM GEO-1, project impacts to paleontological resources would be less than significant.

Cumulative Impacts: Geology and Soils

Impacts associated with geologic and soil issues are typically confined to individual project sites or within a very localized area because of site-specific conditions. Related projects would be subject to established guidelines and building code regulations and construction procedures pertaining to seismic hazards. The Los Angeles Building Code would require consideration of seismic design for all related projects. Related projects would be required to implement LAMC regulations for grading and excavations during construction and implement mitigation measures and project design features to reduce geologic or seismic hazards. In addition, the related project sites are located in a highly urbanized area of Downtown Los Angeles and would connect to existing wastewater infrastructure. Thus, the related projects would not need to use septic tanks or alternative waste disposal systems. The project site is not located within a State-designated hazard zone for earthquake induced liquefaction or landslides. The project and related projects would be required to comply with guidelines and building code regulations pertaining to seismic hazards and with approved geotechnical recommendations, risks associated with seismic rupture, lateral spreading, subsidence, liquefaction, or collapse would also be less than significant.

Many of the related projects would require excavation that could potentially expose or damage potential paleontological resources. Generally, however, projects with the potential for substantial excavation would be subject to environmental review under CEQA. If the potential for significant impacts on paleontological resources were identified given a site's characteristics and development program of the cumulative projects, mitigation would be necessary. As with the project, mitigation would include a monitoring program and treatment/curation of discovered fossils. Implementation of mitigation would reduce the potential for adverse effects on fossil resources individually and cumulatively and would preserve and maximize the potential of these resources to contribute to the body of scientific knowledge.

The project is required to implement mitigation measure MM GEO-1 ensuring proper identification, treatment and preservation of any resource, and reducing a significant project impact on paleontological resources to a less than significant level. Therefore, the project's contribution to cumulative impacts would not be cumulatively considerable, and the project, considered together with the related projects, would not result in a cumulative significant impact on paleontological resources. The cumulative impact on paleontological resources would be less than significant.

Conclusion

The project's contribution to cumulative geology and soils impacts would be less than significant and would not be cumulatively considerable. No mitigation is required.

6.8 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?	☐	☐	☒	☐

Details of the GHG analysis are provided in the Air Quality and Greenhouse Gas Technical Report contained in Appendix A.

Would the project:

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

Less Than Significant Impact. State CEQA Guidelines Section 15064.4 provides guidance to lead agencies for determining the significance of impacts from GHG emissions. Section 15064.4(a) provides that a lead agency shall make a good-faith effort based, to the extent possible, on scientific and factual data to describe, calculate, or estimate the amount of GHG emissions resulting from a project. Section 15064.4(a) further provides that a lead agency shall have the discretion to determine, in the context of a particular project, whether to: (1) quantify GHG emissions resulting from a project and/or (2) to rely on qualitative analysis or performance-based standards.

Pursuant to State CEQA Guidelines Section 15064.4(a), the analysis presented herein quantifies GHG emissions resulting from the project and provides a good-faith effort to describe, calculate, and estimate GHG emissions resulting from the project and compares those emissions with the chosen threshold level.

State CEQA Guidelines Section 15064.4(b) also provides that, when assessing the significance of impacts from GHG emissions, a lead agency should focus the analysis on the reasonably foreseeable incremental contribution of the project's emissions to the effects of climate change and consider a timeframe that is appropriate for the project. The lead agency's analysis should reasonably reflect evolving scientific knowledge and state regulatory schemes, and consider (1) the extent to which the project may increase or reduce GHG emissions compared with existing conditions, (2) whether the project's GHG emissions exceed a threshold of significance that the lead agency determines applies to the project, and (3) the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. The analysis of the potential impacts from the project's GHG emissions follows this approach.

The CEQA Guidelines do not provide numeric or qualitative thresholds of significance for evaluating GHG emissions. Instead, they leave the determination of the significance of GHG emissions up to the lead agency and authorize the lead agency to consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence (State CEQA Guidelines Sections 15064.7(b) and 15064.7(c)). The City has not adopted a threshold with supporting analysis setting forth approaches and guidelines for analyzing GHG emissions and climate change in CEQA documents. Additionally, although the City prepared its Sustainable City pLAn in 2015, followed by the update in 2019, these plans do not adopt thresholds of significance and otherwise do not meet the criteria established under State CEQA Guidelines Section 15183.5(b) to be considered as qualified GHG reduction plans. Furthermore, SCAQMD has yet to adopt a GHG significance threshold for land use development projects (e.g., residential/commercial projects).

In the absence of quantitative GHG thresholds and/or a qualified GHG reduction plan for use by a project to tier or streamline its environmental analysis, CEQA provides that a lead agency could rely on regulatory compliance to show a less-than-significant GHG impact if the project complies with or exceeds those programs adopted by CARB or other state agencies. As discussed previously, the project is expected to be in operation by 2026. Beyond 2020, the state has established a GHG emissions reduction target for 2030 that has been codified in law through SB 32 and the 2017 Scoping Plan was adopted to meet this goal. Therefore, 2030 marks the next statutory statewide milestone target applicable to the project. The plan to achieve these statewide emission reduction goals is provided by the 2017 Scoping Plan (and future updates), and demonstrating consistency with the 2017 Scoping Plan will demonstrate that the project is doing its fair share toward achieving statewide reduction targets.

Overall, of the threshold options discussed above, the approach used in this analysis is compliance with regulatory programs, which is appropriate in addressing the project's post-2020 completion and operation. Under this threshold approach, the project's GHG emissions are evaluated for each major emission sector (e.g., energy, water, waste, mobile, and stationary) addressed in the 2017 Scoping Plan to determine whether the project's emissions would conflict with applicable sector-specific reduction targets and strategies identified in the 2017 Scoping Plan to meet the state's 2030 target under SB 32.

Note that GHGs are global pollutants because their long atmospheric lifetimes allow them to be transported great distances from sources. As such, GHGs and global climate change represent cumulative impacts; that is, GHG emissions contribute, on a cumulative basis, to the significant adverse environmental impacts of global climate change. Therefore, in accordance with the scientific consensus regarding the cumulative nature of GHGs, the analysis herein analyzes the cumulative contribution of project-related GHG emissions.

Principal Greenhouse Gases

The principal anthropogenic (human-made) GHGs listed by the Intergovernmental Panel on Climate Change (IPCC) that contribute to global warming are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and fluorinated compounds, including sulfur hexafluoride (SF_6),

hydrofluorocarbons (HFCs), and perfluorocarbons (PFCs). Water vapor, the most abundant GHG, is not included in this list because its natural concentrations and fluctuations far outweigh its anthropogenic sources. California law and the State CEQA Guidelines contain a similar definition of GHGs (Health and Safety Code Section 38505(g); 14 CCR Section 15364.5).

The primary GHGs of concern associated with the project are CO_2, CH_4, and N_2O. Principal characteristics of these pollutants are discussed below.

- **CO_2** enters the atmosphere through fossil fuels (oil, natural gas, and coal) combustion, solid waste decomposition, plant and animal respiration, and chemical reactions (e.g., manufacture of cement). CO_2 is also removed from the atmosphere (or sequestered) when it is absorbed by plants as part of the biological carbon cycle.

- **CH_4** is emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from livestock and other agricultural practices and from the decay of organic waste in municipal solid waste landfills.

- **N_2O** is emitted during agricultural and industrial activities, as well as during combustion of fossil fuels and solid waste.

Methods have been set forth to describe emissions of GHGs in terms of a single gas to simplify reporting and analysis. The most commonly accepted method to compare GHG emissions is the global warming potential (GWP) methodology defined in IPCC reference documents. IPCC defines the GWP of various GHG emissions on a normalized scale that recasts all GHG emissions in terms of carbon dioxide equivalent (CO_2e), which compares the gas in question to that of the same mass of CO_2 (CO_2 has a global warming potential of 1 by definition). The GWP values used in this analysis are based on the IPCC Fourth Assessment Report (AR4) and United Nations Framework Convention on Climate Change reporting guidelines.[56] The AR4 GWP values are consistent with those used in CARB's most recent GHG inventory and the 2017 Scoping Plan Update.

SB 375 CEQA Streamlining

SB 375 provides CEQA streamlining benefits to transit priority projects (TPPs). A TPP is a project that meets the following four criteria (Public Resources Code [PRC] Section 21155 (a) and (b)):

- Is consistent with the use designation, density, building intensity, and applicable policies specified for the project area in SCAG's 2020-2045 RTP/SCS;

- Contains at least 50 percent residential use, based on total building square footage and, if the project contains between 26 percent and 50 percent nonresidential uses, a floor area ratio of not less than 0.75;

[56] Intergovernmental Panel on Climate Change (IPCC). 2007. Intergovernmental Panel on Climate Change. 2007. *Climate Change 2007: The Physical Science Basis*. Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change. Available: https://www.ipcc.ch/site/assets/uploads/2018/05/ar4_wg1_full_report-1.pdf. Accessed: July 19, 2021.

- Provides a minimum net density of at least 20 units per acre; and
- Is located within one-half mile of a major transit stop or high-quality transit corridor included in Connect SoCal.

Based on the analysis provided in Section 3 Sustainable Communities Environmental Assessment Criteria, the project would qualify as a TPP pursuant to the above criteria. In accordance with PRC § 21155.2(b), projects that qualify as TPPs may be reviewed through a SCEA. Furthermore, PRC § 21155.2(b) (1) states "An initial study shall be prepared to identify all significant or potentially significant impacts of the transit priority project, other than those which do not need to be reviewed pursuant to Section 21159.28 based on substantial evidence in light of the whole record."

Section 21159.28 of the PRC, which was added under SB 375 that was enacted in 2008, provides that residential and mixed-use projects that meet certain criteria are eligible for CEQA streamlining, provided that CARB has accepted the Metropolitan Planning Organization's (MPO's) determination that the project area's SCS achieves the GHG emission reduction targets established by CARB for the region. Specifically, the eligibility criteria for CEQA streamlining under PRC Section 21159.28 is as follows:

- The project must be either a residential or mixed-use residential project where at least 75 percent of the total building square footage of the project consists of residential use, or a project that is a Transit Priority Project (TPP) as defined in Section 21155.
- The project must be consistent with the use designation, density, building intensity, and applicable policies specified for the project area in a CARB-accepted SCS.
- The project must incorporate the mitigation measures required by an applicable prior environmental document.

As a TPP, the project would meet the criteria under Section 21159.28. Therefore, the project would qualify for SB 375 CEQA Streamlining whereby no environmental analysis is required of: (1) project-specific or cumulative impacts from cars and light-duty truck trips generated by the project on global warming or the regional transportation network or (2) growth-inducing impacts. As such, no analysis of GHG emission impacts resulting from passenger cars and light-duty trucks associated with the project is required and were not included in the project's GHG emissions estimates.

Project Design Features

In addition to complying with standard measures for building development, such as including energy efficient appliances, low-flow plumbing fixtures, bicycle parking spaces, on-site trees, and installation of electric vehicle infrastructure, the following GHG-reducing PDF measure would be implemented by the Project Applicant and agreed to by the City, would be incorporated into the project:

PDF-GHG-1:

- No more than 50 percent of the residential units shall have an indoor fireplace installed. This measure would reduce the consumption of natural gas and associated GHG emissions.

Short-term Construction

Construction of the project would result in temporary generation of GHG emissions related to off-road equipment use and on-road vehicle operations. As mentioned previously, GHG emissions are measured exclusively as cumulative impacts; therefore, the project's construction emissions are considered part of the total GHG emissions for the project lifecycle, which also include GHG emissions during operations. In accordance with SCAQMD guidance, the project's construction emissions are amortized over a 30-year period and the resulting annual emissions are combined with the project's annual operational GHG emissions.

Table 6-11 below shows GHG emissions related to construction of the project. As shown, construction of the project is estimated to generate a total of 3,563 $MTCO_2e$ over the construction period. When amortized over a 30-year period, the project's construction GHG emissions would be approximately 119 $MTCO_2e$ per year. Because construction emission sources would cease once construction is complete, construction emissions are considered short term.

TABLE 6-11. ESTIMATED SHORT-TERM CONSTRUCTION RELATED GHG EMISSIONS

Construction Years	Estimated GHG Emissions ($MTCO_2e$)[a]
2022	128
2023	1,193
2024	1,250
2025	993
Total Construction Emissions	3,563
Annual Construction Emissions (Amortized over 30 years)	119

Source: Emissions modeling by ICF using CalEEMod version 2016.3.2 (Appendix A).
[a] Totals may not add up due to rounding.

Long-term Operation

Area and indirect sources of GHG emissions associated with the project would primarily result from electricity and natural gas consumption, water transport (the energy used to deliver water to and from the project site), and solid waste generation. GHG emissions from electricity consumed on the project site would be generated off-site by fuel combustion at the electricity provider. GHG emissions from water transport are also indirect emissions resulting from the energy required to transport water from its source. In addition, the new residential and retail uses at the project site would also generate mobile source emissions from motor vehicle trips generated by residents and patrons.

The estimated operational GHG emissions resulting from the project are shown in Table 6-12. Additionally, in accordance with SCAQMD's recommendation, the project's amortized

construction-related GHG emissions from Table 6-12 are added to the operational emissions estimate in order to determine the project's total annual GHG emissions.

TABLE 6-12. ESTIMATED ANNUAL GREENHOUSE GAS EMISSIONS FROM PROJECT OPERATION IN 2026 (METRIC TONS PER YEAR)

Emission Source	Estimated Annual GHG Emissions ($MTCO_2e$ per year)[a]
Area	86
Electricity[b]	664
Natural Gas	279
Mobile[c]	550
Stationary	51
Waste	27
Water/Wastewater	174
Total Annual Operational Emissions	**1,830**
Amortized Construction	119
Total Annual Project Emissions	**1,949**

Source: ICF Emissions Modeling (Appendix A).
[a] Totals may not add up due to rounding.
[b] As the project is a transit priority project that qualifies for SB 375 CEQA streamlining, the mobile-related GHG emissions presented in this table exclude those generated from passenger cars and light-duty trucks pursuant to Public Resources Code Section 21155.2(b)(1).

As shown in Table 6-12, the project's total annual GHG emissions would be approximately 1,949 $MTCO_2e$ per year.

As discussed above, the project's compliance with regulatory programs is used to analyze the significance of its potential impacts with respect to GHG emissions dating from its post-2020 completion and operation. Under this threshold approach, the project's GHG emissions are evaluated for consistency with each major emission sector (e.g., energy, water, waste, mobile, and stationary) addressed in the 2017 Scoping Plan to determine whether the project's emissions would conflict with applicable sector-specific reduction targets and strategies identified in the 2017 Scoping Plan to meet the state's 2030 target under SB 32. The following sections present the sector-by-sector analysis of the project's potential GHG impacts.

Area Emissions

As shown in Table 6-12, emissions associated with area sources would be approximately 86 $MTCO_2e$ per year. The project's area sources include gasoline-powered landscaping equipment (e.g., trimmers, mowers). Area source emissions associated with landscaping equipment are based on CalEEMod's default assumptions, which estimates equipment usage based on square footage of new building space. The landscaping at the project site would include trees, shrubs, and ground cover vegetation as opposed to grassed lawn areas, thereby minimizing the routine use of mowers and other landscaping equipment. Additionally, the project's landscaped areas would be comprised of native and drought tolerant vegetation. This type of landscaping typically requires minimal pruning and maintenance, which also serves to minimize the use of fuel-powered landscaping equipment. The Scoping Plan does not include specific measures or 2030 emissions reduction requirements for landscaping equipment. While the inevitable transition away from fossil fuel

equipment would be needed to achieve carbon neutrality by 2045, the Scoping Plan did not assume all electric landscaping equipment in their 2030 reduction analysis. Thus, because the use of trees and shrubs instead of grass lawn areas by the project would reduce landscaping emissions relative to buildings that largely incorporate grass, the project would be consistent with the Scoping Plan's overall goal of reducing emissions from fossil-fueled landscaping equipment.

Energy Emissions

GHGs are emitted directly from buildings through the combustion of any type of fuel (e.g., natural gas for cooking). GHGs can also be emitted indirectly from the generation of electricity. The Scoping Plan outlines strategies to reduce energy demand and fossil fuel use, while increasing energy efficiency and renewable energy generation. These strategies include transitioning to cleaner fuels, greater efficiency in existing buildings, and electrification of end uses in commercial sectors. As shown in Table 6-12, the project's building energy emissions would be approximately 943 $MTCO_2e$ per year.

The Office of Planning and Research's 2018 *CEQA and Climate Change Advisory* recommends that a land use development project that "achieves applicable building energy efficiency standards, uses no natural gas or other fossil fuels, and includes Energy Star appliances where available, may be able to demonstrate a less-than-significant greenhouse gas impact associated with project operation." While the Office of Planning and Research recommends new buildings do not consume fossil fuels, the 2017 Scoping Plan does not assume all electric buildings in their 2030 reduction analysis. Rather, the 2017 Scoping Plan assumes new gas appliances will be high efficiency.

The project would install energy-efficient HVAC and lighting systems, Energy Star appliances, and meet CALGreen and Title 24 Building Standards Code requirements. Though the project would allow for natural gas appliances and heating, all units would meet high efficiency standards, consistent with the assumptions and emissions reduction requirements of the 2017 Scoping Plan for 2030. Thus, the project would be consistent with the 2017 Scoping Plan's overall goal of reducing building energy emissions to meet the state's 2030 GHG reduction target.

Mobile Source Emissions

GHG emissions associated with on-road mobile sources are generated from residents, workers, and visitors, and delivery vehicles traveling to and from the project site. As noted previously, because the project is a transit priority project that qualifies for CEQA streamlining under SB 375, no environmental analysis is required for the project's GHG emissions from passenger cars and light-duty trucks. As shown in Table 6-12, emissions from mobile sources (excluding passenger cars and light-duty trucks) would be approximately 550 $MTCO_2e$ per year. It should be noted that these emissions are for the opening year (2026) of the project, and that future annual emissions from mobile sources associated with the project would continue to decline as the state's transportation sector transitions to zero-emission and lower-emission vehicles.

As discussed above, CARB acknowledges that reductions in VMT are required to meet the state's long-term climate change goals. The project's urban infill location, with nearby access to public transportation in proximity to the project site, is consistent with state and local VMT reduction policies. The project site is near high frequency transit service options, including bus lines operated

by Metro, LADOT (DASH and Commuter Express), and other municipal transit agencies, as well as the Metro A (Blue) Line, Metro E (Expo) Line, and the planned Los Angeles Streetcar.

The project would provide bicycle parking spaces at the project site that satisfies LAMC requirements to support bicycling by its employees, residents, and visitors. Thus, the project's location in an urban infill site within a high-quality transit area (HQTA), as defined by SCAG, and a TPA along with its mix of land uses would encourage the use of transit, walking and bicycling. As such the project would reduce VMT from automobiles and minimize GHG emissions associated with mobile emissions. Furthermore, the project would provide 131 Electric Vehicle Ready Parking Spaces including 44 Electric Vehicle Charging Stations. The provision of these spaces at the project site would further reduce mobile GHG emissions. Overall, the project would be consistent with the state's goal of reducing VMT.

Land Use Emissions

The existing landscaping on the project site is limited and consists of three Canary Island pines occur southeast of the project site along South Hill Street and three goldenrain trees along the northeast boundary on 11th Street, none of which is a protected species under the LAMC. As part of the project, one of the trees would be removed, to be replaced with two new street trees, as part of the provision of 120 new trees on the project site. Additionally, the project site would also plant other native and drought-tolerant vegetation such as shrubs and ground cover at the podium and roof terrace. The increase in trees and vegetation at the project site would increase carbon sequestration over existing conditions. While there are no relevant measures in the Scoping Plan or explicit regulatory requirements related to tree or vegetation planting, the Scoping Plan does discuss the importance of maintaining natural and working lands, which also encompasses green spaces in urban and built environments, to serve as a carbon sink. Additionally, the Scoping Plan notes that the creation and management of parks and other green space in urban areas, including expansion of the existing urban tree canopy, would help to reduce GHG emissions. Thus, the additional trees and native and drought-tolerant vegetation by the project would be consistent with the Scoping Plan's overall goal of avoiding losses in carbon sequestration.

Waste Emissions

Solid waste may be disposed in landfills or diverted for recycling, composting, or reuse. GHG emissions from landfills are generated through anaerobic breakdown of material. The Scoping Plan aims to reduce waste emissions by diverting waste away from landfills through waste reduction, re-use, composting, and material recovery. In addition, Assembly Bill (AB) 341 requires mandatory recycling for certain commercial businesses, including a multi-family residential dwelling of five units or more.

As shown in Table 6-12, emissions associated with waste would be approximately 27 $MTCO_2e$ per year. As of February 1, 2018, a new waste and recycling system for all businesses and large apartment complexes in the City referred to as "recycLA" was implemented by the Los Angeles Department of Sanitation, which is responsible in overseeing the collection and recycling of waste generated by residential, commercial and industrial uses in the City and surrounding communities. Under the recycLA program, the City is divided into 11 different service zones and waste collection contracts are awarded to seven different companies to collect trash at businesses, apartment

buildings, and condos in those areas. Part of the services that recycLA will offer to businesses and large multi-family customers include blue bins for recycling and organics recycling. The implementation of this program aims to reduce landfill disposal by one million tons per year by 2025 and reduce waste by 65 percent in all 11 of the City's service zones, with the goal of achieving zero waste by 2050. Thus, upon its completion and operation in 2024, the project would be served by this solid waste collection and recycling service, which is consistent with the Scoping Plan's overall goal of reducing waste emissions and its specific strategy to avoid landfill methane emissions by reducing the disposal of landfilled waste and organics through programs such as edible food recovery programs. In addition, these features would support and comply with AB 341's mandatory recycling requirement and support the state's recycling goal. With respect to construction and demolition debris, the 2019 CALGreen Code, as amended in the LAMC, requires that at least 65 percent by weight of job site debris generated by most types of building project types be recycled, reused, or otherwise diverted from landfill disposal.

Water and Wastewater Emissions

Indirect GHG emissions result from the production of electricity used to convey, treat, and distribute water and wastewater. The amount of electricity required to convey, treat, and distribute water depends on the volume of water as well as the sources of water. The Scoping Plan outlines objectives and goals to reduce GHGs in the water sector, including using and reusing water more efficiently through greater water conservation, drought tolerant landscaping, stormwater capture, and water recycling. Regulations have further targeted water supply and water conservation (e.g., SB X7-7) through building and landscaping efficiency (e.g., Title 24).

As shown in Table 6-12, the annual emissions associated with water use would be approximately 174 $MTCO_2e$ during the project's opening year. The project would incorporate water efficiency measures in compliance with the applicable requirements of the California Green Building Standards Code and the City of Los Angeles Green Building Code, which incorporates by reference the CALGreen Code. The project's design would utilize low-flow plumbing fixtures that at a minimum comply with the flush volumes and gallons per minute water rates in the CALGreen Code and City requirements that decreases indoor water use. Outdoor water conservation measures include the installation of water-efficient irrigation systems and the planting of water-efficient landscaping consisting of native and drought-tolerant vegetation to minimize irrigation requirements. Thus, the indoor and outdoor water conservation measures of the project serve to support ongoing regulatory programs (e.g., SB X7-7, Title 24) that aim to reduce GHG emissions associated with conveying water and distributing water to ultimately achieve climate neutrality.

Conclusion

As discussed above, the project's sustainability measures are consistent with applicable polices from the 2017 Scoping Plan and regulatory programs for the area, energy, water, waste, and land use sectors. The project's consistency with other statutes and policies related to GHG reduction efforts identified in the 2017 Scoping Plan are identified under Impact GHG-2. The project would also result in a net increase in trees at the project site along with other native and drought-tolerant vegetation over existing conditions, and therefore would be consistent with Scoping Plan's overall goal of avoiding losses in carbon sequestration. The location of the project in an urban infill site in proximity to multiple transit options along with its mixed-use development of residential, TORS

units, and restaurant uses would also result in a reduction in VMT that is consistent with the Scoping Plan's long-term climate change goals. Overall, GHG emissions from construction and operation of the project would have a less-than-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?

Less Than Significant Impact.

SCAG 2020-2045 RTP/SCS

The 2020-2045 RTP/SCS is a long-range planning document that balances future mobility and housing needs with economic, environmental, and public health goals in the SCAG region. One of the key strategies of the plan is to integrate land use, housing, and transportation planning to ensure sustainable regional growth. Goals and policies included in the 2020-2045 RTP/SCS to reduce GHG emissions consist of adding density in proximity to transit stations, mixed-use development and encouraging active transportation (i.e., non-motorized transportation such as bicycling). SCAG's 2020-2045 RTP/SCS complies with SB 375, which requires an SCS to be prepared as part of the RTP by each MPO that outlines policies to reduce per capita GHG emissions from automobiles and light trucks. The SCS policies include a mix of strategies that encourage compact growth patterns, mixed-use design, alternative transportation, transit, mobility and access, network expansion, and transportation investment. Table 6-13 shows the project's consistency with the 2020-2045 RTP/SCS goals and guiding policies.

TABLE 6-13. CONSISTENCY OF PROJECT WITH SCAG 2020–2045 RTP/SCS

Applicable Targets	Project Consistency Assessment
2020-2045 RTP/SCS Goals	
1. Encourage regional economic prosperity and global competitiveness	**Not applicable**. SCAG and its member agencies are responsible for aligning RTP/SCS investments and polices with improving regional economic prosperity and competitiveness. The project would not conflict with this goal.
2. Improve mobility, accessibility, reliability, and travel safety for people and goods	**Consistent**. The project site is located in an active, mixed-use area that offers an array of transportation choices, with ready access to transit infrastructure and employment. The project includes new residential condominiums, TORS units, and commercial uses in the diverse South Park neighborhood of downtown Los Angeles. The project site is located in a highly walkable area surrounded by a diverse mix of land uses, including high- and mid-rise office buildings, residential buildings, hotels, retail and restaurant uses, museums, night clubs, theaters, cultural districts, warehouses, and light industrial uses. The project is also located in an identified Transit Priority near a number of transit opportunities including the nearby Metro Rail Pico Station (less than 0.3 miles from the project site), the 7th/Metro Center Station (approximately 0.7 mile from the project site) and the Metro Pershing Square Station (approximately 0.8 miles from the project site). The project site is also served by multiple bus lines via stations at Olive Street/11th Street (serving the 14/37, 70, 71, 76, 78/79/378, and 96 lines), Hill Street/12th Street (serving the 83, 90/91, 94, Commuter Express 409, and Dash downtown D lines), and Broadway/11th Street (serving the 2/302, 4, and 745 lines). The closest Metro bike share stations are located at 12th Street and Hill Street (129 West 12th Street) and at Grand Avenue and 14th Street (1375 South Grand Avenue). The project site is also immediately

Applicable Targets	Project Consistency Assessment
	adjacent to the future downtown LA Streetcar route along 11th Street. In addition, near the project site, Tier 1 bike lanes are provided along 11th street, northwest of Broadway. Tier 3 bike lanes are provided on South Hill Street, north of the 10 freeway and south of 4th street. The project's close location near transit enables residents and visitors to the project to reach surrounding services, jobs, and other destinations with relative ease and within a reasonable time, using a diverse array of transportation choices. This supports the goal of increased mobility, accessibility, reliability, and travel safety. The project would support public safety for travel near the project site by providing new lighting within the project site and around the perimeter including new building identification lighting, commercial accent lighting, wayfinding, balcony lighting, and security lighting. The project would incorporate street lighting along South Hill Street and West 11th Street, with street lighting on 11th Street to match the recently installed lights on 11th Street corridor for the MyFig project. Pedestrian areas including pathways and entryways into the project would be well-lit for security and ground-mounted. Pedestrian access to the project would be distinct from vehicle driveways and the project would not mix pedestrian and automobile traffic to ensure pedestrian safety. The project would be subject to site Plan review to ensure vehicle and pedestrian safety throughout the project. Therefore, the project is consistent with this goal.
3. Enhance the preservation, security, and resilience of the regional transportation system	**Consistent**. The project would support the regional transit system by encouraging increased transit use, as the project would be located in close proximity to the Metro Rail Pico Station and the 7th/Metro Center Station, and numerous bus lines, thereby contributing to increased ridership, preservation, and resilience of the City's multimodal transportation system in the region.
4. Increase person and goods movement and travel choices within the transportation system	**Consistent**. The project would encourage the use of mass transit, walking and bicycling, as the project would locate mixed-use residential, TORS units, and commercial development on a project site that is located near numerous bus lines, the Metro Rail Pico Station, 7th/Metro Center Station, and bicycle lanes. Since the project would develop residential uses within walking distance of existing bus lines and light rail transit stations, and would also provide long-term and short-term bicycle parking, the project would provide opportunities for residents and visitors to use public transit for work trips, and walk to retail businesses near the project area. Thus, the project would encourage the utilization of mass transit as a mode of transportation to and from the project site area and contribute to increasing person and travel choices within the transportation system. The project would be consistent with this goal.
5. Reduce greenhouse gas emissions and improve air quality	**Consistent.** The project would be consistent with this Goal by facilitating the use of alternative modes of transportation, which would aid in reducing car trips and positively impact air quality and reduce greenhouse gas emissions. The project includes pre-wiring for EV charging spaces for 30 percent of project's parking capacity for future use. Of the 30 percent EV parking spaces, 10 percent of the total parking capacity would include installed chargers for immediate use by EV. The project includes ample bicycle parking spaces for the residential condominiums, TORS units, and commercial uses of the project. The project would encourage transit, pedestrian and bicycle travel by incorporating a mixture of land uses area surrounded by a diverse mix of land uses including residential, commercial, and service uses. The project would be within close proximity to multiple transit options. Furthermore, the project would include pedestrian-friendly landscaping and design, streetscape improvements, and street level commercial uses that would enliven the pedestrian experience.

Applicable Targets	Project Consistency Assessment
	The project would also include a number of sustainability features that would reduce greenhouse gas emissions and improve air quality, including high efficiency heating, ventilation, and air conditioning (HVAC) equipment consisting of water source heat pumps; high efficiency glazing, external shading, enhanced insulation, enhanced façade design to minimize infiltration, high-efficiency condensing boilers, and combination of instantaneous water heaters and centralized water heaters; compartmentalized design and interior barriers to limit stack effect through building and resultant infiltration of un-conditioned air; light-emitting diode (LED) lighting; lighting controls; energy Star–labeled appliances; variable flow pool pumps; and commissioning of all mechanical, electrical, and plumbing systems.
6. Support healthy and equitable communities	**Consistent**. The project would be consistent with this Goal by facilitating the use of alternative modes of transportation and a diversity of housing options, which would support healthy and equitable communities. The project site is located in the Central City Community Plan area. According to the City data contained in the City of Los Angeles Interactive Health Atlas, the Central City Community Plan area has a walkability score of 10.3, the highest walkability score in the City. As the Health Atlas only tracks data at the Community Plan level, walkability data was also gathered for the project site specifically. According to Walkscore.com, the project site is rated 92 for a walk score, which means daily errands can be accomplished on foot and many residents are able to forgo owning a car.[57] The project site's bike score is rated "Very Bikeable" with a score of 87, which means the area is good for biking based on bike lanes and trails, hills, and road connectivity.[58] The project site is also rated a "Rider's Paradise" for transit score with a score of 100, which means the project site is served by world-class public transportation. In addition, the City of Los Angeles adopted the Health and Wellness General Plan Element (Plan for a Healthy Los Angeles) in March 2015 that provides a high-level policy vision, along with goals and objectives to elevate health as a priority for the City's future growth and development[59]. Some of the land use goals include accommodating a diversity of land uses, encouraging development near mobility options, supporting transit-oriented development, and emphasizing bicycle mobility. The project would encourage pedestrian travel and bicycle by developing new residential and commercial uses on-site within a mixed-use development in an urban area surrounded by a diverse mix of land uses including residential, commercial, industrial and service uses. The project would be within close proximity to multiple transit options. Furthermore, the project would include pedestrian-friendly landscaping and design, streetscape improvements, and street level commercial uses that would enliven the pedestrian experience for the entire community.
7. Adapt to a changing climate and support an integrated regional development pattern and transportation network	**Consistent**. The project would be consistent with this Goal by facilitating the use of alternative modes of transportation, which would aid in adapting to a changing climate and supporting an integrated regional development pattern and transportation network. The project encourages increased transit use, as the project would be located in close proximity to the Metro Rail Pico Station and the 7th/Metro Center Station, thereby contributing to increased ridership of the City's multimodal transportation network. The project includes an ample amount of bicycle parking spaces for the residential, TORS units, and commercial uses of the project. The project would

[57] https://www.walkscore.com/score/1111-s-hill-st-los-angeles-ca-90015. Accessed July 17, 2021.

[58] https://www.walkscore.com/score/1111-s-hill-st-los-angeles-ca-90015. Accessed July 17, 2021.

[59] https://planning.lacity.org/odocument/7f065983-ff10-4e76-81e5-e166c9b78a9e/Plan_for_a_Healthy_Los_Angeles.pdf Accessed July 29, 2021.

Applicable Targets	Project Consistency Assessment
	encourage pedestrian travel by incorporating new residential and commercial uses on-site within a mixed-use development as well as locating the project in an urban area surrounded by a diverse mix of land uses including residential, commercial, industrial and service uses. The project would also comply with the California Title 24 Building Standards Code and CALGreen Code. Energy savings and a sustainable design would be incorporated throughout the project. The project would emphasize energy conservation, which would be achieved through the use of energy-efficient HVAC and lighting systems.
8. Leverage new transportation technologies and data-driven solutions that result in more efficient travel	**Not Applicable**. This goal is directed towards SCAG to result in more efficient travel. Nevertheless, the project would include 30 percent of parking spaces that would be prewired for charging EVs, and 10 percent would have chargers installed for immediate use by EVs.
9. Encourage development of diverse housing types in areas that are supported by multiple transportation options	**Consistent.** The project is a mixed-use project would include 319 new multi-family residential units of various sizes and for different household types. It is anticipated that the residential unit count would comprise 24 studio units, 144 one-bedroom units, 127 two-bedroom units, 20 three-bedroom units, and 4 three-bedroom penthouse units. It would place this housing near jobs, services, and transit and provide ample bicycle parking and pedestrian infrastructure to incentivize increased biking and walking. The project also encourages increased transit use, as the project would be located in close proximity to the Metro Rail Pico Station and the 7th/Metro Center Station, and multiple bus routes, thereby contributing to increased ridership of the City's multimodal transportation system in the region and transportation options for the users of the project site.
10. Promote conservation of natural and agricultural lands and restoration of habitats	**Consistent**. The project would be consistent with this Goal because the project does not propose the conversion of any natural or agricultural lands to urban use. The project is located in an urban, infill site, and there are no natural or agricultural lands on or near the project site.
2020-2045 RTP/SCS Guiding Principles	
1. Base transportation investments on adopted regional performance indicators and MAP-21/FAST Act regional targets	**Not Applicable**. This principle is directed toward SCAG in allocating transportation investments. This principle does not apply to the individual development projects such as the project, and no further analysis is required.
2. Place high priority for transportation funding in the region on projects and programs that improve mobility, accessibility, reliability, and safety, and that preserve the existing transportation system	**Not Applicable**. This principle is directed towards SCAG in allocating transportation system funding. Nevertheless, the project would contribute to a safe, well maintained, and efficient multimodal transportation system.
3. Assure that land use and growth strategies recognize local input, promote sustainable transportation options, and support equitable and adaptable communities	**Not Applicable**. This principle is directed towards SCAG and the City of Los Angeles and does not apply to individual projects such as the project. Nevertheless, the project site's urban infill location near mass transit and proximity to services, commercial uses, and employment opportunities promotes a pedestrian- friendly environment and supports equitable and adaptable communities. The location of the project site also promotes the use of a variety of transportation options, which includes walking and the use of public transportation.
4. Encourage RTP/SCS investments and strategies that collectively result in reduced non-recurrent congestion and demand for single occupancy vehicle use, by leveraging new transportation technologies and expanding travel choices	**Not Applicable**. The project would not involve RTP/SCS investments, but would place housing and employment options near multiple public transportation options and non-motorized transportation infrastructure, which would reduce demand for single occupancy vehicle use and leverage past and future RTP/SCS investments. The project would be located within a HQTA and a TPA, and, as such, would support public transportation and other alternative methods of transportation that reduce single-occupancy vehicle use.

Applicable Targets	Project Consistency Assessment
5. Encourage transportation investments that will result in improved air quality and public health, and reduced greenhouse gas emissions	**Consistent**. The project would increase housing options in Downtown LA and provide employment opportunities near multiple public transit options. The project's proximity to transit would reduce vehicle trips and associated regional and localized air pollutant and GHG emissions, which would support the goals of public health.
6. Monitor progress on all aspects of the Plan, including the timely implementation of projects, programs, and strategies	**Not applicable**. This principle is directed toward SCAG and the City of Los Angeles and not does apply to individual projects such as the project.
7. Regionally, transportation investments should reflect best-known science regarding climate change vulnerability, in order to design for long term resilience	**Not applicable**. SCAG and its member agencies are responsible for transportation investments and ensuring that they reflect the best-known science regarding climate change vulnerability. The project would not conflict with this policy.
Focus Growth Near Destinations & Mobility Options Strategy 1. Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations	**Consistent**. As stated above, the project would provide commercial uses and residential units in a HQTA and a TPA. The project would place housing near jobs and transit and provide bicycle parking and pedestrian infrastructure to incentivize increased biking and walking. The project would include bicycle parking spaces for the residential condominiums, TORS units, and commercial uses of the project, in accordance with LAMC requirements. The project also encourages increased transit use, as the project would be located in close proximity to the Metro Rail Pico Station and the 7th/Metro Center Station, thereby contributing to increased ridership of the City's multimodal transportation system in the region and transportation options for the users of the project site.
Focus Growth Near Destinations & Mobility Options Strategy 2. Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets	**Consistent**. As stated above, the project would provide new jobs and housing through the introduction of TORS units, commercial, and residential uses in a HQTA and a TPA as shown in Figures 3-1 and 3-2. The project site is in close proximity to a network of regional transportation facilities providing connectivity to the greater Los Angeles County. The project site is less than 0.3 miles northeast of the Metro Rail Pico Station, approximately 0.7 miles southeast of the 7th/Metro Center Station, and approximately 0.8 miles south of the Metro Pershing Square Station. The project site is also served by multiple bus lines via stations at Olive Street/11th Street (serving the 14/37, 70, 71, 76, 78/79/378, and 96 lines), Hill Street/12th Street (serving the 83, 90/91, 94, Commuter Express 409, and Dash downtown D lines), and Broadway/11th Street (serving the 2/302, 4, and 745 lines). The project site is also immediately adjacent to the future downtown LA Streetcar route along 11th Street. The downtown LA Streetcar is a planned 4-mile route that would provide connections to downtown neighborhoods, destinations, and regional transit options. As the project site is surrounded by various land uses, including residences, hotels, offices, restaurants, retail uses, parking structures, and surface parking lots, it is likely that addition to transit, visitors, workers, and residents would also walk and bicycle to and from the project to destinations. The project would support this by providing bicycle parking and providing enhanced pedestrian amenities around the project site.
Focus Growth Near Destinations & Mobility Options Strategy 3. Plan for growth near transit investments and support implementation of first/last mile strategies	**Consistent**. As stated above, the project would provide commercial and residential uses in a HQTA and a TPA. The project site is in close proximity to a network of existing regional transit systems providing connectivity to the greater Los Angeles County. The project site is less than 0.3 miles northeast of the Metro Rail Pico Station, approximately 0.7 miles southeast of the 7th/Metro Center Station, and approximately 0.8 miles south of the Metro Pershing Square Station. In addition, the project would provide bicycle parking and pedestrian infrastructure to incentivize increased biking and walking for the first/last mile. The project site is also immediately adjacent to the future planned transportation investments including the downtown LA Streetcar route. Also, currently under construction, is the Metro Regional Connector Project, a 1.9-mile alignment which will extend from the Little

Applicable Targets	Project Consistency Assessment
	Tokyo/Arts District Station to the 7th Street/Metro Center Station in downtown Los Angeles.
Focus Growth Near Destinations & Mobility Options Strategy 4. Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses	**Consistent**. The project would remove an existing, vacant, warehouse uses and create substantial new investment on the project site by creating new and active uses including 3,429 sf of ground floor commercial uses and up to 160 new TORS units.
Focus Growth Near Destinations & Mobility Options Strategy 5. Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods	**Consistent**. The project would remove an existing, underutilized, vacant, warehouse and redevelop the site with up to 319 multi-family residential units, up to 3,429 sf of ground floor commercial uses, up to 160 TORS units. Furthermore, the project would include pedestrian-friendly landscaping and design, streetscape improvements, and street level commercial uses that would enliven the pedestrian experience and increase connectivity for the entire community.
Focus Growth Near Destinations & Mobility Options Strategy 6. Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations)	**Consistent**. The project would facilitate the use of alternative modes of transportation, which would aid in reducing the number of solo car trips. The project includes ample bicycle parking spaces for the residential, TORS units, and commercial uses of the project. The project would encourage pedestrian travel by incorporating new residential, TORS units, and commercial uses on-site within a mixed-use development as well as locating the project in an urban area surrounded by a diverse mix of land uses including residential, commercial, industrial and service uses. The project would be within close proximity to multiple transit options. Furthermore, the project would include pedestrian-friendly landscaping and design, streetscape improvements, and street level commercial uses that would enliven the pedestrian experience.
Focus Growth Near Destinations & Mobility Options Strategy 7. Identify ways to “right size” parking requirements and promote alternative parking strategies (e.g., shared parking or smart parking)	**Consistent**. The project would include up to 436 total vehicle parking spaces, in compliance with the LAMC requirement. The project qualifies for a reduction in automobile parking spaces, under the Municipal Code’s bicycle parking reduction provision (LAMC Section 12.21 A.4 and 12.21 A.16). Additionally, the project proposes allocation of designated parking for fuel-efficient, ride sharing, and alternative fuel vehicles and pre-wiring for EV charging spaces for 30 percent of project’s parking capacity for future use. The project would also provide ample bike parking in compliance with the LAMC requirements.
Promote Diverse Housing Choices Strategy 1. Preserve and rehabilitate affordable housing and prevent displacement	**Consistent**. The project is an infill development proposed on an urban infill site that does not contain any existing housing units.
Promote Diverse Housing Choices Strategy 2. Identify funding opportunities for new workforce and affordable housing development	**Not Applicable**. This strategy is directed toward SCAG and does not apply to individual projects such as the project. Nevertheless, the project would be providing 319 new housing units, in in a variety of sizes and price levels, in an urbanized area within the City of Los Angeles. As part of the Transfer of Floor Area Ratio (TFAR) entitlement, the Project would make a substantial Public Benefit Payment (PBP) and the City may utilize the PBP for the provision of affordable housing upon City Council approval.
Promote Diverse Housing Choices Strategy 3. Create incentives and reduce regulatory barriers for building context-sensitive accessory dwelling units to increase housing supply	**Not Applicable**. This strategy is directed toward SCAG and does not apply to individual projects such as the project.
Promote Diverse Housing Choices Strategy 4. Provide support to local jurisdictions to streamline and lessen barriers to housing development that supports reduction of greenhouse gas emissions	**Consistent**. This strategy is directed toward SCAG and does not apply to individual projects such as the project. However, the project site’s urban infill location near mass transit and proximity to services, commercial uses, and employment opportunities promotes a pedestrian- friendly environment and supports reduced greenhouse gas emissions. The location of the project site also promotes the use of a variety of transportation options, which

Applicable Targets	Project Consistency Assessment
	includes walking and the use of public transportation, which also supports reduced greenhouse gas emissions.
Leverage Technology Innovations Strategy 1. Promote low emission technologies such as neighborhood electric vehicles, shared ride hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space	**Consistent**. This strategy is directed toward SCAG and does not apply to individual projects such as the project. However, the project would provide 131 Electric Vehicle Ready Parking Spaces including 44 Electric Vehicle Charging Stations. The project would also provide bike parking in compliance with the LAMC requirements.
Leverage Technology Innovations Strategy 2. Improve access to services through technology—such as telework and telemedicine as well as other incentives such as a "mobility wallet," an app-based system for storing transit and other multi-modal payments	**Not Applicable**. This strategy is directed toward SCAG and does not apply to individual projects such as the project.
Leverage Technology Innovations Strategy 3. Identify ways to incorporate "micro-power grids" in communities, for example solar energy, hydrogen fuel cell power storage and power generation	**Consistent**. This strategy is directed towards SCAG and does not apply to individual projects such as the project. However, the project would include a number of energy conservation and efficiency measures such as high efficiency HVAC equipment consisting of water source heat pumps; high efficiency glazing, external shading, enhanced insulation, enhanced façade design to minimize infiltration, high-efficiency condensing boilers, and combination of instantaneous water heaters and centralized water heaters; and energy Star–labeled equipment. The project would designate 15 percent of the building's roof area as a zone for solar use. .
Support Implementation of Sustainability Policies Strategy 1. Pursue funding opportunities to support local sustainable development implementation projects that reduce greenhouse gas emissions	**Consistent**. This strategy is directed toward SCAG and does not apply to individual projects such as the project. However, the project site's urban infill location near mass transit and proximity to services, commercial uses, and employment opportunities promotes a pedestrian- friendly environment and supports reduced greenhouse gas emissions. The location of the project site also promotes the use of a variety of transportation options, which includes walking and the use of public transportation, which also supports reduced greenhouse gas emissions.
Support Implementation of Sustainability Policies Strategy 2. Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations	**Consistent**. This strategy is directed toward SCAG and does not apply to individual projects such as the project. However, the project would provide commercial and residential uses in a HQTA and a TPA. The project site is in close proximity to a network of existing and planned regional transit corridors, bus routes, and stations providing connectivity to the greater Los Angeles County.
Support Implementation of Sustainability Policies Strategy 3. Support local jurisdictions in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), or other tax increment or value capture tools to finance sustainable infrastructure and development projects, including parks and open space	**Not Applicable.** This strategy is directed toward SCAG and does not apply to individual projects such as the project.
Support Implementation of Sustainability Policies Strategy 4. Work with local jurisdictions/communities to identify opportunities and assess barriers to implement sustainability strategies	**Consistent**. This strategy is directed toward SCAG and does not apply to individual projects such as the project. However, the project would include a number of sustainability measures including energy efficiency, water efficiency, material conservation, and resource efficiency.
Support Implementation of Sustainability Policies	**Not Applicable**. This strategy is directed towards SCAG and does not apply to individual projects such as the project.

Applicable Targets	Project Consistency Assessment
Strategy 5. Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region	
Support Implementation of Sustainability Policies Strategy 6. Continue to support long range planning efforts by local jurisdictions	**Not Applicable**. This strategy is directed toward SCAG and does not apply to individual projects such as the project.
Support Implementation of Sustainability Policies Strategy 7. Provide educational opportunities to local decisions makers and staff on new tools, best practices and policies related to implementing the Sustainable Communities Strategy	**Not Applicable**. This strategy is directed toward SCAG and does not apply to individual projects such as the project.
Promote a Green Region Strategy 1. Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards	**Consistent**. This strategy is directed toward SCAG and does not apply to individual projects such as the project. However, the project would facilitate the use of alternative modes of transportation, which would aid in local climate adaptation and community resiliency. The project encourages increased transit use, as the project would be located in close proximity to the Metro Pico Station and the 7th/Metro Center Station, thereby contributing to increased ridership of the City's multimodal transportation network. The project includes bicycle parking spaces for the residential, TORS, and commercial uses of the project. The project would encourage pedestrian travel by incorporating new residential and commercial uses on-site within a mixed-use development as well as locating the project in an urban area surrounded by a diverse mix of land uses including residential, commercial, industrial, and service uses.
Promote a Green Region Strategy 2. Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration	**Consistent**. This strategy is directed towards SCAG and does not apply to individual projects such as the project. However, the project would be required to comply with California Building Code Title 24. Energy saving and sustainable design would be incorporated throughout the project. The project would emphasize energy and water conservation, which would be achieved through the use of energy efficient HVAC and lighting systems, and energy star appliances, and low flow plumbing fixtures. The project would include pre-wiring for EV charging spaces for 30 percent of project's parking capacity for future use. In addition, of the 30 percent EV parking spaces, 10 percent of the project's parking capacity would include installed chargers for immediate use by EV. In addition, the project would include one tree for every four dwelling units, totaling 120 trees. The project would also include a landscaped podium amenity deck on level five and a landscaped amenity roof deck on level 40, both of which would include a garden and landscaping. At each corner of the building, on the roof deck, the project would include four distinctive circular crown rooftop elements that would provide cascading landscaping.
Promote a Green Region Strategy 3. Integrate local food production into the regional landscape	**Not Applicable**. This strategy is directed toward SCAG and does not apply to individual projects such as the project.
Promote a Green Region Strategy 4. Promote more resource efficient development focused on conservation, recycling, and reclamation	**Consistent**. This strategy is directed toward SCAG and does not apply to individual projects such as the project. However, the project would reduce single-passenger vehicle trips and encourage and support transit, which would reduce transportation energy demand. In addition, the project would be required to comply with California Building Code Title 24. Energy saving and sustainable design would be incorporated throughout the project. The project would emphasize energy and water conservation, which would be achieved through the use of energy efficient HVAC and lighting systems, and energy star appliances, and low flow plumbing fixtures. The project would provide 131 Electric Vehicle Ready

Applicable Targets	Project Consistency Assessment
	Parking Spaces including 44 Electric Vehicle Charging Stations. The project would include trash collection that will facilitate separation of organic, recyclable, and non-recyclable trash streams, and diversion of at least 65 percent of construction and demolition waste from landfills.
Promote a Green Region Strategy 5. Preserve, enhance, and restore regional wildlife connectivity	**Not Applicable**. This strategy is directed toward SCAG and does not apply to individual projects such as the project.
Promote a Green Region Strategy 6. Reduce consumption of resource areas, including agricultural land	**Consistent**. This strategy is directed towards SCAG and does not apply to individual projects such as the project. However, the project does not propose the conversation of any natural or agricultural lands to urban use. The project is located in an urban, infill site, and there are no natural or agricultural lands.
Promote a Green Region Strategy 7. Identify ways to improve access to public park space	**Consistent**. This strategy is directed towards SCAG and does not apply to individual projects such as the project. However, the project includes 55,706 sf of open space and would fulfill this through a combination of common indoor open space, common outdoor open space, and private balconies.

Implementation of the RTP/SCS is intended to improve the efficiency of the transportation system and achieve a variety of land use types throughout the SCAG region that meet market demands in a balanced and sustainable manner. Some of the primary land use strategies discussed in the 2020-2045 RTP/SCS include focusing new growth around transit, growth around "Priority Growth Areas," and providing more options for short trips. Priority Growth Areas identified in the 2020-2045 RTP/SCS include Job Centers, TPAs, HQTAs, Neighborhood Mobility Areas, Livable Corridors and Spheres of Influence. Altogether, these areas account for only 4 percent of region's total land area, but implementation of SCAG's recommended growth strategies will help these areas accommodate 64 percent of forecasted household growth and 74 percent of forecasted employment growth between 2016 and 2045.

The project would be consistent with the land use strategies of the 2020-2045 RTP/SCS and the goals of SB 375, including the reduction of VMT and the corresponding mobile GHG emissions. As a transit priority project under SB 375 that is located in a HQTA, the project locates a mixed-use development consisting of residential, TORS, and restaurant uses near multiple public transit options. The urban infill location of the project site is also surrounded by a diverse mixture of land uses including residential, office, commercial, industrial, and service uses. The diversity of land uses in proximity to the project site and the mix of uses associated with the project would reduce vehicle trips and VMT by encouraging walking and non-automotive forms of transportation, which would result in corresponding reductions in mobile GHG emissions. Thus, implementation of the project would help accommodate forecasted growth within the SCAG region while also supporting the reduction of per capita GHG emissions from passenger vehicles consistent with the 2020-2045 RTP/SCS. The project would also incorporate energy and water conservation features to meet the CALGreen Code. Overall, the project would be consistent with the goals of SB 375 and the 2020-2045 RTP/SCS.

AB 32, SB 32, and 2017 Scoping Plan

AB 32 and SB 32 outline the state's GHG emissions reduction targets for 2020 and 2030, respectively. In 2008 and 2014, CARB adopted the Scoping Plan and First Update, respectively, as

a framework for achieving the emissions reduction targets in AB 32. The Scoping Plan and First Update outline a series of technologically feasible and cost-effective measures to reduce statewide GHG emissions. CARB adopted the 2017 Scoping Plan in November 2017 as a framework to achieve the 2030 GHG reduction goal described in SB 32. As discussed previously, because the project is expected to be in operation by 2024, the statewide GHG emissions reduction target for 2030 is the statutory statewide milestone target that is applicable to the project.

Based on CARB's 2017 Scoping Plan, many of the reductions needed to meet the 2030 target will come from state regulations, including cap-and-trade, the requirement for increased renewable energy sources in California's energy supply, updates to Title 24, and increased emission reduction requirements for mobile sources. The 2017 Scoping Plan indicates that reductions would need to come in the form of changes pertaining to vehicle emissions and mileage standards, changes pertaining to sources of electricity and increased energy efficiency at existing facilities, and state and local plans, policies, or regulations that will lower GHG emissions relative to business-as-usual conditions. The 2017 Scoping Plan carries forward GHG reduction measures from the First Update, as well as new potential measures to help achieve the state's 2030 target across all sectors of the California economy, including transportation, energy, and industry.

As discussed above under Impact GHG-1, the project would be consistent with the applicable policies from the 2017 Scoping Plan and regulatory programs for the area, energy, water, waste, and land use sectors. The project would be designed to meet the CALGreen Code and would emphasize energy and water conservation through the use of energy efficient HVAC and lighting systems, energy star appliances, and low flow plumbing fixtures. The project would provide 131 Electric Vehicle Ready Parking Spaces including 44 Electric Vehicle Charging Stations. The project would be consistent with the Scoping Plan's overall goal of avoiding losses in carbon sequestration by planting a net increase of 119 trees at the project site over existing conditions along with other native and drought-tolerant vegetation. By locating its mixed-use residential, TORS units, restaurant, and retail commercial development on a project site that is located within a HQTA and TPA near frequent bus and rail lines, the project would reduce VMT by encouraging the use of transit, walking, and bicycling as compared to similar stand-alone residential uses that are not located in close proximity to transit. Thus, the GHG emission reductions resulting from the project's features, design, and location would be consistent with the goals of the 2017 Scoping Plan and would assist the state with meeting its GHG reduction goals. Table 6-14 shows the project's consistency with statutes and programs identified in the state's 2017 Scoping Plan that aim to reduce GHG emissions.

Table 6-14 shows the project's consistency with statutes and programs identified in the state's 2017 Scoping Plan that aim to reduce GHG emissions.

TABLE 6-14. CONSISTENCY OF PROJECT WITH 2017 SCOPING PLAN

Applicable Policies and Objectives	Project Consistency Assessment
SB 350: Reduce GHG emissions in the electricity sector through the implementation of the 50 percent RPS, doubling of energy savings, and other actions as appropriate to achieve GHG emissions reductions planning targets in the Integrated Resource Plan process.	**Consistent.** This policy is a state program that requires no action at the local or project level. Nonetheless, the project would install energy-efficient appliances and low-flow plumbing fixtures, which would reduce emissions in the energy sector.
Low-Carbon Fuel Standard: Transition to cleaner/less-polluting fuels that have a lower carbon footprint.	**Consistent.** This policy is a state program that requires no action at the local or project level. Nonetheless, the project would reduce mobile-source GHG emissions by including short- and long-term bike parking and providing 131 Electric Vehicle Ready Parking Spaces with 44 Electric Vehicle Charging Stations.
Mobile Source Strategy (Cleaner Technology and Fuels [CTF] Scenario): Reduce GHGs and other pollutants from the transportation sector through transition to zero-emission and low-emission vehicles, cleaner transit systems and reduction of vehicle miles traveled.	**Consistent.** This policy is a state program that requires no action at the local or project level. Nonetheless, the project would reduce mobile-source GHG emissions by including short- and long-term bicycle parking and providing 131 Electric Vehicle Ready Parking Spaces with 44 Electric Vehicle Charging Stations.
SB 1383: Approve and Implement Short-Lived Climate Pollutant strategy to reduce highly potent GHGs.	**Not applicable.** This policy is a state program that requires no action at the local or project level and is not applicable to the proposed project. The project would not conflict with this statute.
California Sustainable Freight Action Plan: Improve freight efficiency, transition to zero-emission technologies, and increase competitiveness of California's freight system.	**Not applicable.** This policy is a state program that requires no action at the local or project level and is not applicable to the proposed project. The project would not conflict with this plan.
Post-2020 Cap-and-Trade Program: Reduce GHGs across largest GHG emissions sources.	**Not applicable.** This policy is a state program that requires no action at the local or project level. The project would not conflict with this program.

City of Los Angeles – Sustainable City pLAn

The 2019 Los Angeles Green New Deal is the first four-year update to the City's 2015 pLAn and expands in more detail the vision to achieve a sustainable future that entails a carbon-neutral economy by 2050. This updated plan accelerates targets from the 2015 pLAn for supplying renewable energy, increasing local water sourcing, reducing building energy, reducing VMT per capita, reducing municipal GHG emissions, increasing the percentage of zero emission passenger and City-fleet vehicles, building new housing near transit, and increasing the number of green jobs. Of the issue areas that are addressed in separate chapters in the 2019 updates to the pLAn, those that are relevant for the project include: Renewable Energy, Local Water, Clean & Health Buildings, Housing & Development, Mobility & Public Transit, Zero Emission Vehicles, Water & Resource Recovery, and Urban Ecosystems & Resilience. The relevant targets established for each of these issue areas that are applicable to the project are shown in Table 6-15. The project-level analysis describes the consistency of the project with these targets.

TABLE 6-15. CONSISTENCY OF PROJECT WITH SUSTAINABLE CITY PLAN (2019 UPDATE)

Applicable Targets	Project Consistency Assessment
Renewable Energy	
• LADWP will supply 55% renewable energy by 2025; 80% by 2036; and 100% by 2045 • Increase cumulative MW by 2025; 2035; and 2050 of: o Local solar to 900-1,500 MW; 1,500-1,800 MW; and 1,950 MW o Energy storage capacity to 1,654-1,750 MW; 3,000 MW; and 4,000 MW o Demand response (DR) programs to 234 MW (2025) and 600 MW (2035)	**Consistent**. Although this reduction target is applicable to the City's renewable energy programs, the project would support this target through its installation of high-efficiency HVAC and electrical systems. The project would also designate 15% of the building's roof area as a zone for solar use.
Local Water	
• Reduce potable water use per capita by 22.5% by 2025; and 25% by 2035; and maintain or reduce 2035 per capita water use through 2050	**Consistent**. The project would comply with the applicable requirements of the California Green Building Standards Code and the City of Los Angeles Green Building Code and incorporate water efficiency measures. The project's design would utilize low-flow plumbing fixtures that at a minimum comply with the flush volumes and gallons per minute water rates in the CALGreen Code and City requirements to reduce indoor water use. The project also incorporates outdoor water conservation measures including the installation of water-efficient irrigation systems and the planting of water-efficient landscaping consisting of native and drought-tolerant vegetation to minimize irrigation requirements. Water demand rates for multi-family residential uses are lower than those for single-family residential uses, and therefore the project would contribute to per-capita reductions in potable water use.[60]
Clean & Healthy Buildings	
• Reduce building energy use per sq. ft. for all building types 22% by 2025; 34% by 2035; and 44% by 2050	**Consistent**. The project would install energy efficient HVAC and lighting systems, Energy Star appliances, and meet Cal Green and Title 24 Building Standards Code requirements. Though the project would allow for natural gas appliances and heating, all units would meet high efficiency standards. The project would also designate 15% of the building's roof area as a zone for solar use.
Housing & Development	
• Ensure 57% of new housing units are built within 1,500 ft. of transit by 2025; and 75% by 2035 • Create or preserve 50,000 income-restricted affordable housing units by 2035 and increase stability for renters	**Consistent**. The project is located in an urban infill location that is near multiple public transportation options offered by Metro, LADOT, and municipal transit agencies and would place housing near jobs and transit. The project would no include income-restricted housing units, but project implementation would not preclude such efforts. The TFAR component requires a PBP and, as approved by the City Council, the PBP can be utilized to create or preserve income-restricted affordable housing units.
Mobility & Public Transit	
• Increase the percentage of all trips made by walking, biking, micro-mobility / matched rides or transit to at least 35% by 2025; 50% by 2035; and maintain at least 50% by 2050 • Reduce VMT per capita by at least 13% by 2025; 39% by 2035; and 45% by 2050	**Consistent**. Due to its location within a HQTA and TPA near multiple public transportation options offered by Metro, LADOT, and municipal transit agencies, the project would reduce VMT by encouraging the use of transit, walking, and bicycling as compared to similar stand-alone residential uses that are not located in close proximity to transit. The urban infill characteristics of the project site offer a diversity of land uses near the project site, which would reduce vehicle trips and VMT by encouraging walking and non-automotive forms of transportation.

[60] Walk Score. 2021. 1111 South Hill Street. Available: https://www.walkscore.com/score/1101-s-hill-st-los-angeles-ca-90015. Accessed: July 19, 2021.

Applicable Targets	Project Consistency Assessment
Zero Emission Vehicles	
• Increase the percentage of electric and zero emission vehicles in the city to 25% by 2025; 80% by 2035; and 100% by 2050	**Consistent**. By providing 131 Electric Vehicle Ready Parking Spaces including 44 Electric Vehicle Charging Stations, the project supports this reduction target by the City.
Waste & Resource Recovery	
• Increase landfill diversion rate to 90% by 2025; 95% by 2035; and 100% by 2050 • Eliminate organic waste going to landfill by 2028 • Increase proportion of waste products and recyclables productively reused and/or repurposed within L.A. County to at least 25% by 2025; and 50% by 2035	**Consistent**. The project would be served by a solid waste collection and recycling service under the recycLA program that was recently implemented on February 1, 2018. Part of the services that recycLA will offer to businesses and large multi-family customers include blue bins for recycling and organics recycling. The implementation of this program is aimed to achieve the City's zero waste goal by 2050. Construction and demolition debris would be disposed of in accordance with the 2019 CALGreen Code, as amended in the LAMC.
Urban Ecosystem & Resilience	
• Increase tree canopy in areas of greatest need by at least 50% by 2028	**Consistent**. There are six non-protected street trees along 11th Street and Hill Street. As part of the project, one of the six existing trees would be removed and replace with two new trees, for a total of seven street trees along the perimeter of the project site. the remaining tree would be maintained. The project would also provide 120 trees on the project site. As such, the project would support the City's reduction target associated with increase the City's tree canopy.

Source: ICF, 2020.

As described in Table 6-15, the project would be consistent with and support the applicable City targets of the 2019 updates to the pLAn for achieving a carbon neutral economy by 2050.

City of Los Angeles Green Building Code

The project would be consistent with the Los Angeles Green Building Code, which would reduce GHG emissions by complying with Title 24 Building Energy Efficiency Standards, as amended by the City, and installing Energy Star appliances. The project would reduce indoor water use through the installation of low-flow plumbing fixtures that, at a minimum, comply with the flush volumes and gallon-per-minute (GPM) water rates in the CALGreen Code and City requirements to decrease indoor water use. Outdoor water conservation measures include the installation of water-efficient irrigation systems and the planting of water-efficient landscaping, consisting of native and drought-tolerant vegetation, to minimize irrigation requirements. The HVAC system would also be designed in compliance with the CALGreen Code to maximize energy efficiency with respect to heat loss and heat gain. Each of these project elements would help minimize GHG emissions, and the project would be consistent with the Los Angeles Green Building Code.

Regulatory Compliance Measures

RCM-GHG-1. The project must meet Title 24 2016 standards and include ENERGY STAR appliances. Energy Star-rated appliances would reduce the projects energy demand during the operational life of the multi-family dwelling units.

RCM-GHG-2. The project is subject to construction and demolition waste recycling of at least 65 percent, per Section 4.408.1 of Title 24 Part 11, California Green Building Standards Code (CALGreen). In addition, project site operations are subject to AB 939 requirements to divert 50

percent of solid waste to landfills through source reduction, recycling, and composting. Finally, the project is required by the California Solid Waste Reuse and Recycling Access Act of 1991 to provide adequate storage areas for collection and storage of recyclable waste materials.

RCM-GHG-3. As mandated by the LA Green Building Code, the project is required to provide a schedule of plumbing fixtures and fixture fittings that reduce potable water within the development by at least 20 percent. It must also provide irrigation design and controllers that are weather- or soil moisture-based and automatically adjust in response to weather conditions and plants' needs.

RCM-GHG-4 The project must comply with the electric vehicle ready and electric vehicle charging requirements set forth in Ordinance No. 186,485.

RCM-GHG-5. Greenhouse Gas Emissions (Green Building Code): In accordance with the City of Los Angeles Green Building Code (Chapter IX, Article 9, of the Los Angeles Municipal Code), the project shall comply with all applicable mandatory provisions of the Los Angeles Green Code and as it may be subsequently amended or modified.

RCM-GHG-6. The project shall comply with City Ordinance No. 184,248 (effective June 2016) amended provisions of Articles 4 and 9 of Chapter IX of the LAMC which establish citywide water efficiency standards and require water-saving systems and technologies in buildings and landscapes to conserve and reduce water usage.

Conclusion

In summary, the GHG emission reductions resulting from the project's features, design, and location would be consistent with the goals of the 2017 Scoping Plan, SB 375, the 2020-2045 RTP/SCS, and Los Angeles' Sustainable City pLAn and Green Building Code. Accordingly, impacts related to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs would be less than significant.

Cumulative Impacts: Greenhouse Gas Emissions

The State of California, through AB 32, has acknowledged that GHG emissions are a statewide impact. The Office of Planning and Research acknowledges that although climate change is cumulative in nature, not every individual project that emits GHGS must necessarily be found to contribute to a significant cumulative impact on the environment. CEQA authorizes reliance on previously approved plans and mitigation programs that have adequately analyzed and mitigated GHG emissions to a less than significant level as a means to avoid or substantially reduce the cumulative impact of the project. As discussed above, the project would be consistent with AB 32, SB 375, SB 32, the 2020-2045 RTP/SCS, and the City's local GHG reduction plan. Therefore, the project's incremental contribution to any cumulative impacts would be less than significant and would not be cumulatively considerable.

6.9 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 involve handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d.	Be located on a site that 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.	Be located within an airport land use plan area or, where such a plan has not been adopted, be within two miles of a public airport or public use airport, and 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?	☐	☐	☒	☐
g.	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☐	☒

The following discussion is based in part, on the *Phase I Environmental Site Assessment* (Phase I ESA) prepared by PIC Environmental Services dated February 19, 2019 that was conducted to evaluate the presence of known or suspected hazardous materials or waste at the project site. The discussion is also based on the *Phase II Site Assessment Geologic Report* (Phase II) prepared by PIC Environmental Services dated March 31, 2019. The Phase I and Phase II were reviewed by PIC Environmental Services on July 6, 2021 and the findings and analysis of both reports remain valid for the project. (Appendix F). The Phase II was prepared to evaluate the potential presence of chemicals stemming from historical uses on or adjacent to the project site identified during the Phase I ESA. Specifically, the Phase II conducted drilling, sampling, and testing at three locations at the project site to evaluate the presence of methane, hydraulic oil, polychlorinated biphenyls (PCBs), and dry-cleaning solvent.

Would the project:

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

Less Than Significant. Typical of many construction projects, construction of the project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings

and other finishing materials, and cleaning agents, fuels, and oils. However, all materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions. Also, all construction work would be performed consistent with applicable federal Occupational Safety and Health Administration (OSHA) Safety and Health Standards and California Occupational Health and Safety Administration (Cal/OSHA) requirements to ensure the safety and well-being of construction workers.

Operation of the project's residential, TORS, and commercial uses would involve the use and storage of small quantities of potentially hazardous materials in the form of typical cleaning solvents, painting supplies, pesticides for landscaping, and pool maintenance. The use of these materials would be in small quantities and in accordance with the manufacturers' instructions for use, storage, and disposal of such products. Therefore, operation of the project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

Conclusion

With compliance with applicable regulatory requirements, impacts would be less than significant and no mitigation measures are required.

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

Less Than Significant. The project site was initially developed as early as 1888 for residential uses. By 1906, numerous residential structures had been constructed on site. According to the Phase I ESA, by 1923, former residential dwellings were demolished, and a former commercial building was constructed on site. Various commercial uses were conducted on site including a former cleaners in 1929. In 1954, the buildings were demolished, and the existing building was constructed and used from the 1950s through the 1980s to publish newspapers and magazines. As documented in Phase I ESA, the basement level of the on-site building contained hydraulic-powered equipment to lift newsprint and other supplies to upper levels.

There were no Recognized Environmental Conditions (RECs) documented in the Phase I ESA or Phase II at the project site, but the following issues were identified:

Asbestos-Containing Building Materials

The project site is currently developed with a warehouse building constructed in 1954. The project site was historically used from the 1950s through the 1980s to publish newspapers and magazines. As the on-site structure was built before the 1978 federal regulations banning the use of asbestos-containing building materials (ACBMs) were enacted, there is a potential for the presence of ACBMs in the on-site buildings. Therefore, prior to the issuance of any permit for the demolition of the existing buildings or the alteration of the existing church building to be retained, a comprehensive ACBM survey of the buildings must be performed. California Health and Safety Code Section 19827.5, adopted January 1, 1991, requires that local agencies not issue demolition

or alteration permits until an applicant has demonstrated compliance with notification requirements under applicable federal regulations regarding hazardous air pollutants, including asbestos.

If no ACBMs are found, the Project Applicant shall provide a letter to LADBS from a qualified asbestos consultant indicating that no ACBMs are present in the on-site buildings. However, if ACBMs are found to be present, they would be abated in compliance with the SCAQMD Rule 1403 and other applicable State and federal rules and regulations. With regulatory compliance, the risk related to any existing ACBMs at the project site would be reduced to acceptable levels, and the project would result in no impact with regard to ACBMs (RCM HAZ-1).

Lead-Based Paint

Lead and lead compounds can be found in many types of paint. In 1978, the Consumer Product Safety Commission set the allowable lead levels in paint at 0.06 percent by weight in a dry film of newly applied paint. In the 1970s, the chief concern of lead paint was its cumulative effect on bodily systems, primarily when paint chips containing lead were ingested by children. As discussed above, the existing on-site buildings were constructed prior to the 1978 federal regulations banning the use of lead-based paints (LBPs). Therefore, there is potential for the presence of LBPs in the on-site building, which could pose a significant hazard to construction workers or the public.

Cal/OSHA's Lead in Construction Standard requires project proponents to develop and implement a lead compliance plan when LBP would be disturbed during construction.[61] The plan must describe activities that could emit lead, methods for complying with the standard, safe work practices, and a plan to protect workers from exposure to lead during construction activities. Cal/OSHA requires 24-hour notification if more than 100 square feet of LBP would be disturbed. The regulations to manage and control exposure to LBP pertain to project construction and include the potential demolition and disposal of lead-containing materials.

Should LBP materials be identified, standard handling and disposal practices shall be implemented pursuant to Cal/OSHA regulations. With regulatory compliance (RCM HAZ-2), the risk related to any existing LBPs at the project site would be reduced to acceptable levels, and the project would result in no impact with regard to LBPs.

PCBs and PCEs

Polychlorinated biphenyls (PCBs) were once used as industrial chemicals whose high stability contributed to both their commercial usefulness and their long-term deleterious environmental and health effects. Prior to 1978, PCBs were commonly used in dielectric fluids in transformers, capacitors, and light ballasts due to their desirable thermal characteristics, and hydraulic fluid compactor. Due to their demonstrated toxicity and persistence in the environment, PCB manufacturing in the United States was discontinued.

Tetrachloroethene (PCE) is a nonflammable, colorless liquid also known as perchloroethene or perc. PCE is a volatile organic compound (VOC), which means it evaporates readily into the air.

[61] California Code of Regulations, Title 8, Section 1532.1 Lead. https://www.dir.ca.gov/title8/1532_1.html.

PCE is often used as a dry cleaning agent and metal degreasing solvent. PCE released to surface water or surface soil tends to evaporate quickly, but breaks down very slowly in groundwater and can persist for a long time. PCE and other VOCs may migrate from contaminated groundwater and soil into air spaces beneath buildings and enter the indoor air.

A former commercial laundry was located on the project site at 208 West 11th Street in 1929. However, the use of PCE was not available and/or commonly used until after World War II. Moreover, about 20 feet of surficial soil was excavated and removed from the property in 1954 to construct the existing building on the project site. However, due to the historic laundry cleaning and newspaper printing uses on the project site, the Phase I ESA recommended as a precautionary measure, a subsurface soil investigation to be conducted as part of the Phase II investigation to determine the potential presence of PCBs and PCE on the project site.

As part of the Phase II investigation, three vertical borings were drilled/cored and sampled at the project site (two on the north end of project site near 11th Street and one on the southwest portion of the project site near Hill Street) on March 12, 2019. Nylaflow tubing and valves were installed in borings at depths of five feet below the basement surface then sealed in hydrated bentonite. Undisturbed soil samples were also recovered at five feet below the basement surface. A total of three soil samples and six soil gas samples were recovered from the three borings. The samples were tested at a State certified laboratory for quantitative analyses of total petroleum hydrocarbons, PCBs, and VOCs.

The results of the testing concluded that no detectable residual concentrations of PCE dry cleaning solvent were measured in any boring. In addition, all of the soil testing results indicated no detected levels for petroleum, VOCs (solvents), and PCBs.

Radon Gas

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

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

pCi/L=picocuries per liter

According to the California Environmental Protection Agency (CalEPA), Los Angeles County is classified as a "Zone 2" county having a predicted average screening level between 2 and 4 picocuries per liter (pCi/L) of air. Radon sampling was not conducted as part of the Phase I ESA.

Radon gas dissipates in outdoor settings and is present throughout Los Angeles County at concentrations considered to be harmless in the vast majority of areas. However, radon gas can

accumulate inside buildings and enclosed spaces, depending on the building location, ventilation, and other factors. The US EPA recommends indoor remedial measures (such as enhanced ventilation) for residential, school, and office uses when radon concentrations exceed 4.0 picocuries per liter (pCi/L) on an average basis (the US EPA action level). Based on EPA data, the radon level within the City at the project site's general location, like much of the City of Los Angeles, is considered moderate with a predicted average indoor radon screening level between 2 and 4 pCi/L. As such, radon is not considered to present a significant hazard to the project. Standard building practices related to indoor ventilation would ensure radon does not accumulate within the proposed buildings at harmful concentrations.

As such, the presence of radon gas is not expected at the project site, and the project would result in less-than-significant impacts with respect to radon gas contamination.

Underground Storage Tank (UST)

The Phase I ESA included a site inspection and review of historic records and noted no evidence of evidence of underground storage tanks (USTs) at the project site. Although the likelihood of encountering USTs at the project site is low, should any known or previously undiscovered oil production wells be encountered at the project site during construction activities, per RCM-HAZ-3, the Project Applicant or construction manager shall halt work in the immediate area and notify California Geologic Energy Management Division (CalGEM) and the City of Los Angeles Fire Department immediately. Any such wells should be abandoned or re-abandoned in accordance with the requirements of DOGGR and the Los Angeles Fire Department. With adherence to regulations, impacts would be less than significant.

Oil and Gas Drilling Activity

The project site is located above a portion of the Los Angeles Downtown Oil Field, which was discovered in 1965. In addition, there are several historic oil wells drilled in close proximity to the project site. More specifically, in 1963 Standard Oil Co. (now Chevron) discovered oil below the project site in a nearby "core hole."[62] In 1965 Chevron drilled and completed numerous oil wells from a centralized "drill island" south of the property at the intersection of Hill Street and 14th Place. By the mid-1990s, Chevron sold its interest in the oil field. Nasco Petroleum, LLC now operates all oil wells in the field. The Phase I ESA indicates that no historic oil well drilling or oil production facilities have been located on the project site and no documented, historic occurrence of petroleum or hazardous materials contamination were discovered at the project site. However, as discussed further below, due to the presence of an underlying oil field, sampling and testing of methane gas were conducted at the project site as part of the Phase II investigation.

Methane

The Los Angeles Methane Zone Map is a publication by the LADBS. This map identifies various areas of hazardous subsurface methane gas, within Los Angeles city limits. These hazardous gas zones are usually a result of naturally surfacing tar and crude oil, or shallow soil contamination by

[62] Phase I Environmental Site Assessment (Phase I ESA) prepared by PIC Environmental Services dated February 19, 2019

old oil drilling wells. Additionally, landfill sites are known to produce methane gas. As a result, the Los Angeles Methane Zone Map categorizes two types of zones: methane buffer zones and methane zones. And each zone is based on proximity to a methane soil gas source. Consequently, according to the City of Los Angeles, most development projects within these zones require a methane mitigation system. As the project site is located in a City of Los Angeles Methane Zone, and overlies the Los Angeles Downtown oil field, there is a potential for methane and other volatile gases to occur beneath the project site. The project site has been identified to be within a "Methane Zone." These areas pose a risk of methane intrusion emanating from geologic formations. The Phase II recommended installation of preventive, Level I, passive subsurface vent piping and vapor barriers under the project to mitigate potential, subsurface accumulation of methane vapors per the Los Angeles Building Code Chapter 71, Methane Mitigation Standards Ordinance.

Based on the results of the methane gas sampling conducted as part of the Phase II investigation, the highest methane measurement was located in the southwest portion of the project site at a level of 1.3 ppm. All of the methane concentrations tested at the project site are below regulatory guidance action levels. While the project would result in a deeper excavation depth than tested in the 2019 methane survey, the project would be subject to developmental regulations pertaining to ventilation and methane gas detection systems that are mandated by the City's building code and project specific requirements within the final geological investigation submitted to the LADBS (RCM GEO-1).

Furthermore, project development would be governed by the regulations per the City of Los Angeles Building Code Chapter 71, Methane Mitigation Standards Ordinance. This ordinance provides installation procedures, design parameters and test protocols for methane gas mitigation systems. (RCM HAZ-4.) More specifically, the Methane Mitigation Standards ordinance includes requirements for site testing, methane mitigation systems, and ventilation systems. Site Design Levels are categorized as Level I through Level V. Compliance with City requirements would ensure that the project would not result in reasonably foreseeable upset or accident conditions involving the release of methane gas into the environment and impacts would be less than significant.

Conclusion

Project construction would not involve the use of hazardous materials in substantial amounts such that a measurable risk to the public or the environment would result from construction activities. In addition, all construction work would be performed consistent with applicable federal OSHA Safety and Health Standards and Cal/OSHA requirements to ensure the safety and well-being of construction workers. Thus, with compliance to applicable laws, regulations, and manufacturers' instructions, potential risks of exposure to hazardous materials for the public or the environment, including schools due to project construction, would be less than significant.

Operation of the project would involve the use of only small quantities of hazardous materials typically used in residential, TORS, and commercial projects such as cleaning solvents, painting supplies, and pesticides for landscaping. However, such materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations.

As discussed above, no evidence of significant environmental concern was identified in connection with the project site that would create a significant hazard to the public or the environment through a reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Compliance with regulatory requirements would ensure no significant construction or operational impacts related hazards would occur.

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

Less Than Significant. The closest schools to the project are Los Angeles Unified School District's (LAUSD's) Los Angelitos Early Education Center located at 915 S. Olive Street, and LA Child Care and Development Council at 1001 S. Hope Street; both are approximately 0.2 mile northwest of the project site. As discussed above, construction of the project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils typically used in construction. However, all such substances and materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions and are not expected to cause risk to the public or nearby schools. In addition, all construction work would be performed consistent with applicable federal OSHA Safety and Health Standards and Cal/OSHA requirements to ensure the safety and well-being of construction workers. Thus, with compliance to applicable laws, regulations, and manufacturers' instructions, potential risks of exposure to hazardous materials for the public or the environment, including schools due to project construction, would be less than significant.

The types of potentially hazardous substances and materials that would be used in association with the operation of the project would include those typical of residential, TORS, and commercial developments, such as small quantities of cleaning solvents, painting supplies, pesticides for landscaping, and pool maintenance. However, such substances and materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Therefore, operation of the project would not create a significant risk of exposure to hazardous materials for the public or the environment, including schools.

Conclusion

Impacts would be less than significant and no mitigation measures are required.

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

Less Than Significant Impact. Government Code Section 65962.5, amended in 1992, requires CalEPA to develop and update annually the Cortese List, which is a list of hazardous waste sites and other contaminated sites. While Government Code Section 65962.5 refers to the preparation of a list, many changes have occurred related to web-based information access since 1992, and

information regarding the Cortese List is now compiled on the websites of the Department of Toxic Substances Control (DTSC), the State Water Resources Control Board (SWRCB), and CalEPA. DTSC maintains the EnviroStor database, which includes sites on the Cortese List and also identifies potentially hazardous sites where cleanup actions (such as a removal action) or extensive investigations are planned or have occurred. The database provides a listing of Federal Superfund sites (National Priorities List); State Response sites; Voluntary Cleanup sites; and School Cleanup sites. GeoTracker is SWRCB's data management system[63] for managing sites that impact groundwater, especially those that require groundwater cleanup (USTs, Department of Defense, Site Cleanup Program) as well as permitted facilities such as operating USTs and land disposal sites. CalEPA's database includes[64] lists of sites with active Cease and Desist Orders or Cleanup and Abatement Orders from SWRCB.

As part of the Phase I ESA (Appendix F), a search was conducted for available federal, state, and local environmental database records for the project site and adjoining properties and nearby properties and surrounding areas within 1 mile of the project site. According to the review of environmental database records, the project site is listed on five regulatory databases. These database results are discussed below:

1. *Resource Conservation and Recovery Act (RCRA) - Small Quantity Generator (SQG):* This federal list includes sites which have historically obtained permits to legally dispose of hazardous waste (e.g., spent photo chemicals or waste oil). While the project site is listed in this database, appearance on the federal RCRA list does not indicate the presence of a subsurface contamination problem.

2. *Facility Index and Registry System (FINDS):* This federal list includes sites which appear on or more other federal regulatory and permit lists. The project site is included on the FINDS list due to the RCRA waste disposal permit identified above. However, appearance on the federal FINDS list does not indicate the presence of a subsurface contamination problem.

3. *Enforcement and Compliance History (ECHO):* This federal list, like the FINDS list, includes sites that appear on other lists. The project site's appearance on the ECHO list does not indicate the presence of a subsurface contamination problem.

4. *HAZNET - Facility and Manifest Data:* This state list includes sites which have historically obtained permits to legally dispose of hazardous wastes (e.g., photochemical waste). Associated Press which was located on the project site is included on the HAZNET list. The project site's appearance on the HAZNET list does not indicate the presence of a subsurface contamination problem.

5. *EDR Exclusive List of Historic Cleaners and Drycleaners (EDR US HIST CLEANERS):* EDR maintains a proprietary list of sites that have contained commercial cleaners. The project site appears on the EDR list due to a 1929 business directory listing at 208 West 11th Street. It very

[63] https://geotracker.waterboards.ca.gov/

[64] https://calepa.ca.gov/database-and-directories/

unlikely the former cleaners used chlorinated solvents (PCE) because these solvents were not commonly available until after World War II. In addition, about 20 feet of near surface soil was excavated and removed from the property in 1955 to construct the existing building and basement. In addition, soil testing conducted on the project site in March 2019 as part of the Phase II investigation, indicated no detected levels for petroleum, VOCs, PCE, and PCBs. The project site's appearance on the EDR list does not indicate the presence of a subsurface contamination problem.

The Phase I ESA included a regulatory review of adjacent properties within a one-mile radius of the project site. The Phase I ESA indicated that no adjacent properties had known historic environmental concerns.

As determined in the Phase I ESA, while the project site is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962, the project site would not create a significant hazard to the public or the environment caused in whole or in part from the project's exacerbation of existing environmental conditions. The project would not contain uses that would exacerbate existing environment conditions.

Conclusion

Impacts with respect to hazardous materials lists, including Government Code Section 65962.2 would be less than significant and no mitigation measures are required.

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

No Impact. The project site is not in a designated Airport Hazard Zone. Furthermore, the project site is not located within an airport land use plan, within two miles of a public airport or public use airport, or within the vicinity of a private airstrip. The two nearest airports are the Hawthorne Municipal Airport and Los Angeles International Airport located approximately 9 miles and 10 miles to the southwest, respectively. The nearest private airport or airstrip is the Goodyear Blimp Base Airport in the City of Carson, approximately 13 miles south of the project site. Therefore, the project would not result in an airport-related safety hazard for people residing or working in the project vicinity.

Conclusion

No impact would occur, and no mitigation is required.

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

Less Than Significant Impact.

A project would normally have a significant impact to hazards and hazardous materials if the project involved possible interference with an emergency response plan or emergency evacuation

plan. The project site is located in an established urban area that is well served by an existing roadway network. No City-designated Disaster Routes border the project site; the closest such routes are Olympic Boulevard one block to the north and Broadway one block to the east.[65] These routes would be close enough to the project site to potentially be affected by backup congestion associated with the project's construction and operation. The City's Emergency Operations Organization (EOO) implements the goals and policies of the Safety Element. The Safety Element outlines the scope of the EOO's on-going efforts to use experiences and new information to improve the City's hazard program. The EOO Master Plan and individual agency Emergency Response Plans set forth procedures for City personnel to follow in the event of an emergency situation stemming from natural disasters, technological incidents and nuclear defense operations.

Development of the project site may require temporary and intermittent partial street closures due to construction activities. Nonetheless, while such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans. During construction of the project, the rightmost southbound lane on South Hill Street would be closed with both northbound lanes would remain open. As at least one travel lane in each direction would remain on South Hill Street, access for any emergency vehicles would not be impeded during project construction along South Hill Street. Along 11th Street, no traffic lanes would be closed due to construction of the project. The bicycle lane may be converted to a shared Class III lane with the vehicles using "sharrows" for the duration of construction at the project site. This change in bicycle access would not affect emergency vehicles traveling to or near the project site.

To minimize any construction impacts on the surrounding street, bicycle, and pedestrian network, the project would implement a Construction Management Plan (PDF TRAF-1). The Construction Management Plan would include measures such as off-site truck staging; scheduling deliveries and pick-ups of construction materials during non-peak travel periods; a worksite traffic control plan; use of flag men to reroute traffic around any closures; establishment of requirements for loading/unloading and storage of materials to ensure that access would remain unobstructed for land uses in proximity to the project site; and coordination with the City and emergency service providers to ensure adequate access is maintained to the project site and adjacent uses.

Project operation would generate traffic in the project site vicinity and would result in some modifications to access to the project site from the streets that surround it, including increasing access by providing two-way traffic in the widened alley to the west of the project site. Adequate emergency access to the project site and to the surrounding area would continue to be provided. Future driveway and building configurations would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for patrons, employees, and residents. project site access and circulation plans would be subject to review and approval by LAFD and LAPD.

[65] City of Los Angeles, Department of City Planning, Safety Element of the Los Angeles City General Plan, adopted November 26, 1996, Exhibit H – Critical Facilities & Lifeline Systems, http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf.

No policy or procedural changes to an existing emergency response plan or evacuation plan would be required due to operation of the Project. Furthermore, during an unanticipated disaster event, City and County agencies (i.e., Police and Fire Departments) would implement operational protocols, as well as plans and programs, on a case by-case basis to facilitate emergency evacuations and/or response, which would consider traffic conditions at the time of the emergency. In such instances, traffic would be routed along the City's disaster routes, as determined appropriate, by the applicable responding City agencies.

Conclusion

Compliance with existing regulations and incorporation of project design features, would ensure that implementation of the project would not impair or physically interfere with an adopted emergency response plan or with an emergency evacuation plan. Impacts related to emergency response plans and emergency evacuation plans are less than significant and no mitigation measures are required.

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

No Impact. The project site is currently developed and located in a highly urbanized area and does not contain wildland features. Therefore, development of the project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.

Conclusion

No impacts would occur in this regard and no mitigation is required.

Regulatory Compliance Measures

RCM -HAZ-1 Prior to the issuance of any permit for the demolition or alteration of the existing structure(s), the applicant shall provide a letter to the Department of Building and Safety from a qualified asbestos abatement consultant indicating that no Asbestos-Containing Materials (ACM) are present in the building. If ACMs are found to be present, it shall be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other applicable State and Federal rules and regulations.

RCM-HAZ-2 Prior to issuance of demolition permits, the Project Applicant shall submit verification to the City of Los Angeles Department of Building and Safety that a lead-based paint survey has been conducted at all existing buildings located on the Project site. If lead-based paint is found, the Project Applicant shall follow all procedural requirements and regulations for proper removal and disposal of the lead-based paint.

RCM HAZ-3: Should any known, or previously undiscovered oil production wells be encountered at the project site during construction activities, the Applicant or construction manager shall halt work in the immediate area and notify DOGGR and the Los Angeles Fire Department immediately. Any encountered wells shall be abandoned or re-abandoned in accordance with the requirements of DOGGR and the Los Angeles Fire Department.

RCM-HAZ-4 The project shall provide a methane mitigation system as required by the Los Angeles Building Code Chapter 71, Methane Mitigation Standards Ordinance.

Cumulative Impacts: Hazards and Hazardous Materials

Like the project, many of the related projects would use, handle, store, and/or transport hazardous materials or require demolition of structures containing such materials. Such related projects would be required to use, store, remove and/or transport all potentially hazardous materials in accordance with the manufacturers' instructions and handle materials in accordance with federal, State, and local health and safety standards and regulations. Compliance with existing standards and regulations would ensure that the related projects would not result in significant impacts to the public or the environment through the routine transport, storage, use, or handling of hazardous materials, and that their development would not result in the release of existing hazardous materials such as ACBMs, LBPs, radon gas, or PCBs. Some of the related projects may be on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. However, each related project would be required to comply with existing Federal, State, and local regulations related to hazardous materials sites, including cleanup sites, and hazardous materials generators. Some of the related projects may also be constructed within Methane Zones, and accordingly would comply with existing City of Los Angeles regulations.

Some of the related projects may also include the use of hazardous materials within 0.25 mile of a school. However, related projects would be subject to environmental review to evaluate potential impacts from hazardous materials releases within 0.25 mile of a school, thereby reducing impacts to less than significant. None of the related projects are within two miles of an airport land use plan, thereby reducing impacts to less than significant.

Some of the related projects may involve temporary construction encroachments into adjacent sidewalks or roadways such as Olympic Boulevard one block to the north and Broadway which are designated disaster routes. However, any changes to access and building configurations would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for patrons, employees, and potential residents. All access and circulation plans would be subject to review and approval by the LAFD and would be developed to meet City standards for emergency access. The related projects would be developed within the existing urban grid and would not require alterations to emergency access routes and would not contribute to cumulative effects in concert with the project.

Related projects are all located in highly urbanized areas, would not contain wildland features, and are not located adjacent to any wildland areas. Therefore, development of related projects would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.

Conclusion

The project's contribution to cumulative hazards and hazardous materials impacts would not be cumulatively considerable, and cumulative impacts would be less than significant.

6.10 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 groundwater quality?	☐	☐	☒	☐
b.	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
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 that would:				
	Result in substantial erosion or siltation on or off site;	☐	☐	☒	☐
	Substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site;	☐	☐	☒	☐
	Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
	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?	☐	☐	☒	☐

The following impact analysis pertaining to hydrology and water quality includes information on the existing and proposed topography/drainage and infrastructure for the project site provided in the *1111 S. Hill Street Project Water Resources Technical Report, August 20,2021* prepared by Psomas. This is included in Appendix G of this SCEA.

Would the project:

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

Less Than Significant.

Construction

Surface Water Quality During Construction

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

also occur. As construction of the project would disturb less than one acre of soil, the project would not be required to obtain a National Pollutant Discharge Elimination System (NPDES) Construction General Permit. However, the project would be required to implement Best Management Practices (BMPs) as required in the project's Stormwater Pollution Prevention Plan (SWPPP) following the latest guidelines of the California Stormwater Quality Association (CASQA) handbook as part of the City's grading permit requirements. BMPs would include, but would not necessarily be limited to, erosion control, sediment control, non-stormwater management, and materials management BMPs (e.g., sandbags, storm drain inlets protection, stabilized construction entrance/exit, wind erosion control, and stockpile management) to minimize the discharge of pollutants in stormwater runoff during construction. In addition, project construction activities would occur in accordance with City grading permit regulations (LAMC Chapter IX, Division 70), such as the preparation of an Erosion Control Plan, to reduce the effects of sediment and erosion.

Construction of the project would require an excavation depth of 45 feet below grade.[66] Historic groundwater levels are located 100 to 120 feet below the existing grade according to the California Division of Mines and Geology. However, the information of groundwater data collected from SWRCB's GeoTracker website indicates that in 2010, groundwater was reported between depths of 32 and 45 feet in two 50-foot-deep monitoring wells located approximately 990 and 1000 feet north of the project site, respectively. Previous borings drilled in 2015 at the project site at depths of 90 to 120 feet did not encounter any groundwater. However, previous borings that drilled in the near vicinity of the project site to 160 feet encountered occasional minor seepage between 27 and 37 feet.[67]

Although the excavation is not below the current groundwater level, it is possible that groundwater could be encountered during excavation. If groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with all applicable regulations and requirements, including all relevant NPDES requirements related to construction and discharges from dewatering operations. NPDES requires dischargers must demonstrate that discharges do not violate any water quality objective/criteria for the receiving waters, demonstrate that discharge shall not exceed effluent limitations, perform an analysis using a sample of groundwater or wastewater to be discharged, show discharge shall not cause acute nor chronic toxicity in receiving waters, that discharge shall pass through a treatment system if necessary, and must comply with the provisions of the NPDES permit. Furthermore, if dewatering is required, the treatment and disposal of the dewatered water would occur in accordance with the Los Angeles Regional Water Quality Control Board (LARWQCB) Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties. With the implementation of site-specific BMPs included as part of the Erosion Control Plan required to comply with the City grading permit regulations, the project would significantly reduce or eliminate the discharge of potential pollutants from the stormwater runoff. Therefore, with regulations and permitting requirements including the NPDES and LARWQCB

[66] 1111 S. Hill Street Project Water Resources Technical Report, August 20,2021 prepared by Psomas
[67] 1111 S. Hill Street Project Water Resources Technical Report, August 20,2021 prepared by Psomas

permit requirements and City grading regulations, construction of the project would not violate any water quality standard or waste discharge requirements or otherwise substantially degrade surface water quality. Furthermore, construction of the project would not result in discharges that would cause regulatory standards to be violated. Thus, temporary construction-related impacts on surface water quality would be less than significant, and no mitigation measures are required.

Groundwater Quality During Construction

As discussed above, although the excavation is not below the current groundwater level, it is still possible that groundwater could be encountered during excavation. If groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with all applicable regulations and requirements, including all relevant NPDES requirements related to construction and discharges from dewatering operations. NPDES requires that dischargers must: demonstrate that discharges do not violate any water quality objective/criteria for the receiving waters; demonstrate that discharge shall not exceed effluent limitations; perform an analysis using a sample of groundwater or wastewater to be discharged; show discharge shall not cause acute nor chronic toxicity in receiving waters; show that discharge shall pass through a treatment system if necessary; and comply with the provisions of the NPDES permit. Therefore, through compliance with regulatory requirements, potential impacts would be less than significant.

If dewatering is required, the treatment and disposal of the dewatered water would occur in accordance with the LARWQCB Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties. Therefore, project construction could potentially improve the existing condition by removing impacted groundwater. In addition, the proposed construction activities would be typical of a residential project and would not involve activities that could further impact the underlying groundwater quality.

Other potential effects to groundwater quality could result from the presence of a UST or during the removal of an UST. As previously described, in Section 6.7, *Geology and Soils*, no existing USTs are anticipated to be found beneath the project site. Therefore, the removal of USTs would not pose a significant hazard on groundwater.

Based on the above, construction of the project would not result in discharges that would violate any groundwater quality standard or waste discharge requirements. Therefore, construction-related impacts on groundwater quality would be less than significant, and no mitigation measures are required.

Operation

Surface Water Quality During Operation

Under the City's LID Ordinance, post-construction stormwater runoff from new projects must be infiltrated, evapotranspirated, captured and used, and/or treated through high efficiency BMPs on-site for the volume of water produced by the greater of the 85th percentile storm event or the 0.75-inch storm event (i.e., "first flush"). Consistent with LID requirements to reduce the quantity and improve the quality of rainfall runoff that leaves the project site, the project would include the installation of capture and use and/or biofiltration system BMPs as established by the LID Manual.

The installed BMP systems would be designed with an internal bypass overflow system to prevent upstream flooding during major storm events. As most potential contaminants are anticipated to be contained within the "first flush" storm event, major storms are not anticipated to cause an exceedance of regulatory standards.

Due to the nature of the proposed development to change the land use from an existing warehouse to a residential/commercial development, the project would result in a reduction of potential types of pollutants. As detailed in the *1111 S. Hill Street Project Water Resources Technical Report, August 20,2021* prepared by Psomas, a comparison between the potential pollutants based on land use and the 303(d) list for Los Angeles River Watershed indicates that the pollutants of concern are trash, oxygen demanding substances (ammonia), nutrients (algae), and metals. These three pollutants of concern would be addressed through the proposed stormwater BMPs in order to comply with Los Angeles County's Standard Urban Stormwater Mitigation Plan (SUSMP) and City of Los Angeles' LID Ordinance. BMPs include, but are not limited to, rainwater harvesting and an increase of landscape area. For example, rainwater harvesting collects rainwater from a surface that allows for the rainwater to be stored and used later. In a typical rainwater harvesting situation, rainwater is collected from an impervious surface such as the roof of a building and then stored inside of a tank or cistern. Rainwater can be collected from other surfaces as well such as parking lots, roadways, driveways, and even land surfaces. Based on the analysis contained in the *1111 S. Hill Street Project Water Resources Technical Report,* through the use of BMPs, the SUSMP, and City's LID Ordinance, there are no significant impacts for surface water quality as a result of the project.

With compliance under the SWPPP, SUSMP, and the City's LID Ordinance, construction and operational water quality impacts would be less than significant.

Groundwater Quality During Operation

Operational activities which could affect groundwater quality include spills of hazardous materials and leaking USTs. Surface spills from the handling of hazardous materials most often involve small quantities and are cleaned up in a timely manner, thereby resulting in little threat to groundwater. Other types of risks such as leaking USTs have a greater potential to affect groundwater. However, as discussed above, the project would not include any new USTs that would have the potential to expose groundwater to contaminants. In addition, while the project would introduce more density and an additional land use (residential) to the project site which would slightly increase the use of potentially hazardous materials as described above, the project would comply with all applicable existing regulations that would prevent the project from affecting or expanding any potential areas of contamination, increasing the level of contamination, or causing regulatory water quality standards at an existing production well to be violated, as defined in CCR Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act. The project also does not include the installation or operation of water wells, or any extraction or recharge system near the coast, an area of known groundwater contamination or seawater intrusion, a municipal supply well, or a spreading ground facility.

In addition, the project includes the installation of a capture and use and/or biofiltration system as a means of treatment and disposal of the volume of water produced by the greater of the 85th

percentile storm or the 0.75-inch storm event, which would allow for treatment of the on-site stormwater. Therefore, the project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade ground water quality. The project's potential impact on groundwater quality during operation would be less than significant, and no mitigation measures are required.

Conclusion

Compliance with the applicable groundwater and surface water regulatory requirements and incorporation of BMPs would ensure impacts to surface or groundwater quality would be less than significant. No mitigation measures are required.

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

Less Than Significant Impact.

Construction

Construction activities for the project involve an excavation depth of 45 feet below grade. Historic groundwater levels are located 100 to 120 feet below the existing grade according to the California Division of Mines and Geology. Previous borings drilled in 2015 at the project site at depths of 90 to 120 feet did not encounter any groundwater. However, previous borings that drilled in the near vicinity of the project to 160 feet encountered occasional minor seepage between 27 and 37 feet. Although the excavation is not below the current groundwater level, it is still possible that groundwater could be encountered during excavation. Per the Geotechnical Investigation,[68] some minor seepage should be anticipated in the excavation, and minor dewatering consisting of gravel-filled trenches installed where necessary, should be anticipated. If groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with all applicable regulations and requirements, including all relevant NPDES requirements related to construction and discharges from dewatering operations. NPDES requires dischargers must demonstrate that discharges do not violate any water quality objective/criteria for the receiving waters, demonstrate that discharge shall not exceed effluent limitations, perform an analysis using a sample of groundwater or wastewater to be discharged, show discharge shall not cause acute nor chronic toxicity in receiving waters, that discharge shall pass through a treatment system if necessary, and must comply with the provisions of the NPDES permit. Therefore, through compliance with regulatory requirements, potential impacts would be less than significant.

Operation

Regarding groundwater recharge, the project site is currently almost entirely impervious. Therefore, there is currently low groundwater recharge potential. While the entirety of the project site would be developed, the project proposes BMPs on site for the volume of water produced by

[68] Preliminary Site Geotechnical and Geologic Assessment Report for Proposed 40-Story Hi-Rise Mixed-Use Development Project 1101-1115 S. Hill Street and 206-210 W. 11th Street, Los Angeles, California, prepared by AECOM

the greater of the 85th percentile storm event or the 0.75-inch storm event (i.e., "first flush"). Nevertheless, the underground footprint of the project's improvements and landscaping would span property line to property line, and therefore the groundwater recharge potential would remain minimal. The volume greater than the first flush of stormwater, which bypasses the BMP systems, would discharge to an approved discharge point in the public right-of-way and would not result in infiltration of a large amount of rainfall that would affect groundwater hydrology, including the direction of groundwater flow. As such, the project would not interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the West Coast Groundwater Basin.

Conclusion

With compliance with existing regulatory compliance measures, the project's construction activities and operations would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project would impede sustainable groundwater management of the basin. Impacts on groundwater would be less than significant, and no mitigation measures are required.

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

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

Less Than Significant Impact.

Construction

Construction activities have the potential to temporarily alter existing drainage patterns and flows on the project site by exposing the underlying soils, modifying flow direction, and making the project site temporarily more permeable. Also, exposed and stockpiled soils could be subject to erosion and conveyance into nearby storm drains during storm events. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. However, as discussed above, project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), such as the preparation of an erosion control plan, to permit regulations, construction activities for the project would not substantially alter the project site drainage patterns in a manner that would result in substantial erosion or siltation on- or off-site. As such, construction-related impacts to hydrology would be less than significant, and no mitigation measures are required.

Operation

The project site is almost entirely impervious under existing conditions. With implementation of the project, the amount of impervious area would not increase. As such, there would be a limited potential for erosion or siltation to occur from exposed soils or large expenses of pervious areas. Therefore, the project would not substantially alter the existing drainage pattern of the project site or surrounding area such that substantial erosion or siltation on site or off site would occur. Operational impacts to hydrology would be less than significant, and no mitigation measures are

required. Impacts are not likely to occur, because as the LARWQCB dictates, the project must provide a LID system which would capture and use all the rainwater from the greater of the 85th percentile storm event or the 0.75-inch storm event. Table 6-16 below summarizes the hydrology results demonstrating the peak stormwater runoff flows for the 5-, 10-, 25-, 50- and 100-year storm events under existing conditions and following construction of the project: As Table 6-16 demonstrates, a decrease in runoff is expected due to the development's implementation of the LID system. Therefore, no impact is expected.

TABLE 6-16. EXISTING AND PROPOSED PEAK RUNOFF FLOWS

	Existing	Proposed*	
Storm Event	**Q_{Total} [cfs]**	**Q_{Total} [cfs]**	**% Reduction**
5-Year	1.118	0.885	-20.8%
10-Year	1.490	1.258	-15.6%
25-Year	1.832	1.602	-12.5%
50-Year	2.087	1.859	-10.9%
100-Year	2.341	2.116	-9.6%

* Includes reduction from LID implementation (subtracting the 85th Percentile storm flow of 0.222 cubic foot per second [cfs])
Source: 1111 S. Hill Street Project Water Resources Technical Report, August 20,2021 prepared by Psomas

Conclusion

The project would result in less than significant impacts associated substantial erosion or siltation on or off site and no mitigation is required.

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

Less Than Significant Impact.

Construction

There are no streams or rivers within or immediately surrounding the project site.[69] Construction activities for the project would involve removal of the existing structures and associated hardscape as well as the excavation and removal of soil. These activities have the potential to temporarily alter existing drainage patterns on the project site by exposing the underlying soils, modifying flow direction, and making the project site temporarily more permeable. Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), such as the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion. Thus, through compliance with applicable City grading permit regulations, construction activities for the project would not substantially alter the project site drainage patterns in a manner that would result in flooding on or off site.

[69] 1111 S. Hill Street Project Water Resources Technical Report, August 20,2021, prepared by Psomas.

Operation

As previously discussed, under the City's LID Ordinance, post-construction stormwater runoff from new projects must be infiltrated, evapotranspirated, captured and used, and/or treated through high efficiency BMPs on site for the volume of water produced by the greater of the 85th percentile storm event or the 0.75-inch storm event (i.e., "first flush"). Consistent with LID requirements to reduce the quantity and improve the quality of rainfall runoff that leaves the project site, the project would include the installation of a BMP system, designed with an internal bypass overflow system to prevent upstream flooding during major storm events. Therefore, while the project would not increase impervious surfaces compared to existing conditions, with implementation of BMPs the project would not increase the rate or amount of surface runoff in a manner which would result in flooding on or off site.

Conclusion

Impacts would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. The project site currently consists of a vacant building, and no landscaped areas. The project site is almost entirely impervious and is not crossed by any water courses or rivers. Currently, stormwater runoff from the project site is conveyed by sheet flow from west to east and is collected in a catch basin on South Hill Street and 11th Street. There is an existing 27-inch City of Los Angeles storm drain line that is located on 11th Street.

The City Los Angeles Bureau of Engineering requires that a storm drain conveyance system be designed for a 25-year storm event and that the combined capacity of a storm drain, and street flow system accommodate flow from a 50-year storm event. In addition, the project would include appropriate on-site drainage improvements to accommodate anticipated stormwater flows Operation of the project would result in an impervious surface area within the project site of 95-percent.[70] The project would include the installation of building roof drain downspouts, area drain, and planter drains to collect roof and site runoff. The project would also direct stormwater away from the building through a series of storm drain pipes. Furthermore, based on the volumetric flow rate analysis, a comparison of the pre- and post-project peak flow rate indicated that there would be a decrease in stormwater runoff. In addition, the implementation of BMPs required by the City's LID Ordinance would target runoff pollutants that could potentially be carried in stormwater runoff due to the collection of water to meet the regional LID guidelines.

[70] 1111 S. Hill Street Project Water Resources Technical Report, August 20,2021, prepared by Psomas.

Conclusion

The project would not 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. Impacts would be less than significant, and no mitigation measures are required.

iv. Impede or redirect flood flows?

Less Than Significant Impact The project site is located inside the 500 Yr. Flood Zone, otherwise known as Zone X, in the Flood Insurance Rate Maps from the Federal Emergency Management Agency (FEMA).[71] The 500-year Flood Zone refers to an area with a 0.2 percent (or 1 in 500 chance) annual chance of flooding. This zone is also used to designate base floodplains of lesser hazards, such as areas protected by levees from 100-year flood, or shallow flooding areas with average depths of less than one foot or drainage areas less than 1 square mile. In addition to the low risk of flooding, the project would implement a capture and use and/or biofiltration system BMPs and a stormwater conveyance system. Thus, the project would not alter the existing drainage pattern of the project site in a manner that would impede or redirect flood flows.

Conclusion

Less-than-significant impacts would occur and no mitigation measures are required.

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

Less Than Significant Impact. Earthquake-induced flooding occurs when nearby water retaining structures, such as dams or storage tanks, are breached or damaged during an earthquake. The Los Angeles County Safety Element (1990) identified the project site to be within a "dam or debris basin flood area." The Hansen Dam Reservoir has been identified by the Los Angeles County Safety Element (1990) as a potential source being located approximately 17 miles to the northwest of the project site.[72] However, there appears to be minimal risk of earthquake-induced flooding at the project site due to the following:

- In general, there are engineering controls in place that are established by state and local agencies to monitor the dam safety in accordance with the National Dam Safety Act (Public Law 92-367) to ensure that these structures are designed and constructed properly as well as receive regular inspections, maintenance and design retrofits, to reduce the potential for earthquake-induced failures.

- In addition to the site distance, there are also numerous drainage channels and spreading grounds between the source and the project site, including the Los Angeles River, that would intercept and divert flood waters that would result from a breach of the Hansen Dam or similar water-storage structures upstream.

[71] 1111 S. Hill Street Project Water Resources Technical Report, August 20,2021, prepared by Psomas.
[72] 1111 S. Hill Street Project Water Resources Technical Report, August 20,2021, prepared by Psomas.

- The latest 2017 City Hazard Mitigation Plan has early-warning provisions and programs to increase public awareness for such an event. This plan was developed to encourage the incorporation of mitigation measures into repairs, major alterations, new development, and redevelopment practices, to further reduce risk.

Moreover, the project would not exacerbate potential dam failure or the possibility of flooding as a result of dam failure. The project is located too far away from the ocean and is at too high of an elevation for it to be affected by a tsunami. Seiches, which is a temporary disturbance in the water levels of lakes or partially enclosed bodies of water, would not affect the project, as it is not close enough to a large body of water to be affected.

The project site is located inside Zone X in the Flood Insurance Rate Maps from FEMA.[73] In addition to the low risk of flooding, the project includes capture and use and/or biofiltration system BMPs and a stormwater conveyance system, which would be improved upon the existing site devoid of treatment and on-site detention. Therefore, the project would not risk release of pollutant due to inundation by flood hazards.

Conclusion

Impacts would be less than significant and no mitigation measures are required.

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

Less Than Significant Impact. Under Section 303(d) of the Clean Water Act, states are required to identify water bodies that do not meet their water quality standards. Biennially, LARWQCB prepares a list of impaired waterbodies in the region, referred to as the 3030(d) list. The project site is located within the Los Angeles River Watershed. Constituents of concern listed for the Los Angeles River under California's Clean Water Act Section 303(d) List include Ammonia, Copper, Indicator Bacteria, Lead, Nutrients (Algae), Oil, and Trash. No Total Maximum Daily Load data have been recorded by U.S. EPA for this waterbody.

Stormwater currently discharges from the project site without treatment or on-site detention. Thus, the project's implementation of capture and use and/or biofiltration system BMPs would minimize the release of anticipated and potential pollutants generated by the project (e.g., sediment, nutrients, pesticides, metals, pathogens, and oil and grease). As the project would not increase the amount of impervious area, implementation of the LID BMP measures on the project site would result in an improvement in surface water quality runoff when compared to existing conditions. In addition, during construction operations the project site is required by SWRCB to implement stormwater management BMPs as required in the project's SWPPP following the latest guidelines of the CASQA handbook. These BMPs would ensure that stormwater runoff quality during construction is maintained in a manner which reduces sediment transmission, lowers stormwater turbidity, as well as maintains the overall pH of the stormwater.

[73] 1111 S. Hill Street Project Water Resources Technical Report, August 20,2021, prepared by Psomas.

As such, the project would not conflict with or obstruct any water quality control plans. With compliance with existing regulatory requirements and implementation of LID BMPs, the project would no conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Impacts would be less than significant.

Conclusion

The project would not conflict or obstruct implementation of a water quality control plan or sustainable groundwater management plan and impacts would be less than significant and no mitigation measures are required.

Regulatory Compliance Measures

RCM-HYD-1 Prior to issuance of a grading permit, the Applicant shall obtain coverage under the State Water Resources Control Board National Pollutant Discharge Elimination System General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, National Pollutant Discharge Elimination System No. CAS000002) (Construction General Permit) for the project, A Storm Water Pollution Prevention Plan shall be prepared and implemented for the project in compliance with the requirements of the Construction General Permit. The Storm Water Pollution Prevention Plan shall identify construction Best Management Practices to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities.

RCM-HYD-2 Sediment carries with it other work-site pollutants such as pesticides, cleaning solvents, cement wash, asphalt, and car fluids that are toxic to sea life.

- Leaks, drips and spills shall be cleaned up immediately to prevent contaminated soil on paved surfaces that can be washed away into the storm drains.
- All vehicle/equipment maintenance, repair, and washing shall be conducted away from storm drains. All major repairs shall be conducted off-site. Drip pans or drop clothes shall be used to catch drips and spills.
- Pavement shall not be hosed down at material spills. Dry cleanup methods shall be used whenever possible. Dumpsters shall be covered and maintained. Uncovered dumpsters shall be placed under a roof or be covered with tarps or plastic sheeting.

RCM-HYD-3. Prior to the issuance of a grading permit, the project shall comply with the SUSMP and/or the Site Specific Mitigation Plan to mitigate stormwater pollution as required by Ordinance Nos. 172,176 and 173,494. The appropriate design and application of BMP devices and facilities shall be determined by the Watershed Protection Division of the Bureau of Sanitation, Department of Public Works.

RCM-HYD-4. Prior to issuance of grading permits, the Applicant shall submit a Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan to the City of Los Angeles Bureau of Sanitation Watershed Protection Division for review and approval. The Low Impact

Development Plan and/or Standard Urban Stormwater Mitigation Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook.

RCM-HYD-5. The Best Management Practices shall be designed to retain or treat the runoff from a storm event producing 0.75 inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater, in accordance with the Development Best Management Practices Handbook Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect confirming that the proposed Best Management Practices meet this numerical threshold standard shall be provided.

Cumulative Impacts: Hydrology and Water Quality

The project in conjunction with related projects could cumulatively increase stormwater runoff flows. However, the project would have no net impact on stormwater flows. Also, in accordance with City requirements, related projects and other future development projects would be required to implement BMPs to manage stormwater in accordance with LID guidelines.

In addition, all related projects are subject to restrictions and requirements as part of the City's existing permitting process and a detailed review of the City of Los Angeles General Plan Safety Element and FEMA Flood Insurance Rate Maps would be conducted as part of the plan check process. Related projects within the 100-year flood plain or floodway would be required to implement appropriate flood plain management measures in the design of new buildings. Compliance with these existing regulatory requirements would ensure that any related projects would not place housing within a flood hazard area without incorporating proper measures. The project, in conjunction with the related projects, would not exacerbate the existing conditions related to, or risks associated with, flooding, and therefore impacts related to flood hazards are not cumulatively considerable.

With respect to drainage capacity, the project would comply with applicable City requirements, which would include the use of BMPs during construction and operation of the project as detailed in a SWPPP and in the City's LID ordinance.

Furthermore, the City of Los Angeles Department of Public Works would review each future development project on a case-by-case basis to ensure enough local and regional infrastructure is available to accommodate stormwater runoff.

Conclusion

The project's contribution to cumulative impacts to hydrology and water quality and flooding hazards would not be cumulatively considerable. Impacts would be less than significant and no mitigation measures are required.

6.11 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?	☐	☐	☐	☒
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?	☐	☐	☒	☐

Would the project:

a. Physically divide an established community?

No Impact. The project site is currently developed with a warehouse that has been vacant since approximately 2013. The project site vicinity is highly urbanized and generally built out and is surrounded by various land uses, including residences, hotels, offices, restaurants, retail uses, parking structures, and surface parking lots. The project proposes to remove the existing warehouse and construct up to 319 multi-family residential units, up to 3,429 square feet of ground floor commercial uses, up to 160 TORS units, up to 436 vehicle parking spaces, and up to 347 bicycle spaces. As such, the project would be an infill project providing uses in keeping with the mixed-use character of the surrounding area. Given the type of uses in the project site vicinity, and the infill character of the project, it would not physically divide an established community, nor would it disrupt or divide an established community through a change in street or land use patterns on surrounding streets.

Thus, given the existing mix of uses in the project site vicinity and the location within an existing developed area, the project would not physically divide, disrupt, or isolate an established community.

Conclusion

No impact would occur, and no mitigation measures are required.

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

Less Than Significant Impact. As discussed below, the project would be substantially consistent with all applicable plans, policies and regulations adopted for the purpose of avoiding or mitigating an environmental effect associated with development of the project site. Therefore, project impacts related to land use and planning would be less than significant, and no mitigation measures are required.

Southern California Association of Governments

The Southern California Association of Governments (SCAG) is a Joint Powers Authority under California state law, established as an association of local governments and agencies that voluntarily convene as a forum to address regional issues. Under federal law, SCAG is designated as a Metropolitan Planning Organization (MPO) and, under state law, as a Regional Transportation Planning Agency and a Council of Governments. SCAG is the MPO for six counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. As the federally designated MPO, SCAG is mandated to research and create plans for transportation, growth management, hazardous waste management, and air quality. Applicable SCAG publications are discussed below.

SCAG Regional Comprehensive Plan

SCAG has prepared the 2008 Regional Comprehensive Plan (2008 RCP) in response to SCAG's Regional Council directive in its 2002 Strategic Plan to define solutions to interrelated housing, traffic, water, air quality, and other regional challenges. The 2008 RCP is an advisory document that describes future conditions if current trends continue, defines a vision for a healthier region, and recommends an Action Plan with a target year of 2035. The 2008 RCP may be voluntarily used by local jurisdictions in developing local plans and addressing local issues of regional significance. The plan includes nine chapters addressing land use and housing, transportation, air quality, energy, open space, water, solid waste, economy, and security and emergency preparedness. The action plans contained therein provide a series of recommended near-term policies that developers and key stakeholders should consider for implementation, as well as potential policies for consideration by local jurisdictions and agencies when conducting project review.

The 2008 RCP replaced the Regional Comprehensive Plan and Guide (RCPG) for use in SCAG's Intergovernmental Review (IGR) process. SCAG's Community, Economic and Human Development Committee and the Regional Council took action to accept the 2008 RCP, which now serves as an advisory document for local governments in the SCAG region for their information and voluntary use in developing local plans and addressing local issues of regional significance. However, as indicated by SCAG, because of its advisory nature, the 2008 RCP is not used in SCAG's IGR process. Rather, SCAG reviews new projects based on consistency with the 2020-2045 RTP/SCS (discussed below).

SCAG 2020-2045 RTP/SCS

On September 30, 2008, SB 375 was passed to help achieve AB 32 goals related to the reduction of GHGs through regulation of cars and light trucks. SB 375 aligns three policy areas of importance to local government: (1) regional long-range transportation plans and investments, (2) regional allocation of the obligation for cities and counties to zone for housing, and (3) a process to achieve GHG emissions reductions targets for the transportation sector. It establishes a process for CARB to develop GHG emissions reductions targets for each region (as opposed to individual local governments or households). SB 375 also requires MPOs to prepare an SCS within the RTP that guides growth while taking into account the transportation, housing, environmental, and economic needs of the region. SB 375 uses CEQA streamlining as an incentive to encourage residential projects, which help achieve AB 32 goals, to reduce GHG emissions.

For the past three decades, SCAG has prepared RTPs with the primary goal of increasing mobility for the region's residents and visitors. The 2020-2045 RTP/SCS includes a strong commitment to build upon and expand land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern.

The 2020-2045 RTP/SCS provides a blueprint for improving quality of life for residents by providing choices for where they will live, work, and play and how they will move around. It is designed to promote safe, secure, and efficient transportation systems to provide improved access to opportunities, such as jobs, education, and healthcare. Its emphasis on transit and active transportation is designed to allow residents to lead a healthier, more active lifestyle. Its goal is to create jobs, ensure the region's economic competitiveness through strategic investments in the goods movement system, and improve environmental and health outcomes for its residents by 2045. More importantly, the 2020-2045 RTP/SCS is also designed to preserve what makes the region special, including stable and successful neighborhoods and an array of open spaces for future generations.

The 2020-2045 RTP/SCS also includes examples of measures that could reduce impacts from planning, development, and transportation. It notes, however, that the example measures are not intended to serve as any kind of checklist to be used on a project-specific basis. Since every project and project setting is different, project-specific analysis is needed to identify applicable and feasible mitigation. These mitigation measures are particularly important where streamlining mechanisms under SB 375 are utilized.

A detailed discussion of the project's consistency with the 2020-2045 RTP/SCS is included in Section 3, *SCEA Criteria and Transit Priority Project Consistency Analysis*. As discussed there, the project would be consistent with the applicable 2020-2045 RTP/SCS goals, principles, and strategies identified in the 2020-2045 RTP/SCS. Therefore, no significant impacts regarding consistency with this plan would occur.

The project would be consistent with 2020-2045 RTP/SCS goals to encourage regional economic prosperity; improve mobility, accessibility, reliability, and travel safety for people and goods; enhance the preservation, security, and resilience of the regional transportation system; increase person and goods movement and travel choices within the transportation system; reduce GHG emissions and improve air quality; support healthy and equitable communities; adapt to a changing climate and support an integrated regional development pattern and transportation network; leverage new transportation technologies and data-driven solutions that result in more efficient travel; encourage development of diverse housing types in areas that are supported by multiple transportation options; and promote conservation of natural and agricultural lands and restoration of habitats.

In addition, as discussed in Section 6.8, *Greenhouse Gas Emissions*, the project would accommodate increases in population, households, employment, and travel demand by implementing smart land use strategies. The project site is an infill location close to jobs, off-site housing, and services, and is in close proximity to existing and future public transit stops. Also, as discussed in Section 6.14, *Population and Housing*, the project's contributions to growth fall within

the range of growth accounted for in the SCAG projections that are used for future planning activities and provision of services. The projections are revised on four-year intervals so as to stay current with current growth trends and changes in land use activity. Changes to planning and zoning designations can be incorporated in timely fashions so long as the growth does not exceed the amount anticipated within the service timelines. Growth at specific sites may vary, while the overall growth patterns are sufficient for planning purposes.

Los Angeles General Plan Framework Element

Adopted in December 1996 and readopted in August 2001, the City of Los Angeles General Plan Framework Element (General Plan Framework) establishes the conceptual basis for the City's General Plan.[74] The General Plan Framework sets forth a citywide comprehensive long-range growth strategy and defines citywide policies regarding land use, housing, urban form, neighborhood design, open space and conservation, economic development, transportation, infrastructure, and public services. General Plan Framework land use policies are further guided at the community level through community plans and specific plans. The General Plan Framework sets forth a conceptual relationship between land use and transportation and encourages new development to be developed near transit.

As discussed in greater detail below in Table 6-17, *Comparison of the Project to the Applicable Land Use Policies of the Framework Element*, the project would be substantially consistent with applicable objectives, goals, and policies of the General Plan Framework. In particular, the project would be substantially consistent with the General Plan Framework Element as follows:

- The project would be substantially consistent with objectives of Chapter 4 on Housing by providing a notable increase in housing in the area, providing up to 319 multifamily residential units in a mix of unit sizes (studio, one-bedroom, two-bedroom, three-bedroom, and penthouse units) at varied rates. In addition, the project would be substantially consistent with the multiple objectives of locating new multifamily housing in close proximity to transit and within high-activity areas.
- The project would provide a mix of uses in close proximity to a broad range of land uses and transit options within walking distance, which would stimulate non-vehicular modes of travel, including transit, pedestrian, and bicycle activity. The project would be integrated with the surrounding area through new ground-level commercial uses and amenities, including new street trees and landscaping.
- The project site would meet the objectives of the land use, economic, and housing policies of the General Plan Framework to provide a diversity of uses, including commercial, TORS, and residential uses in close proximity to transit. The project's mixed uses would support the General Plan Framework's land use, economic, and housing goals to enhance urban lifestyles with proximity to services, retail, and transit.

[74] City of Los Angeles. *Framework Element of the General Plan*. Available: https://planning.lacity.org/odocument/513c3139-81df-4c82-9787-78f677da1561/Framework_Element.pdf. Accessed: May 6, 2021.

Because the project would support and not conflict with the General Plan Framework land use goals, policies, and objectives as described above and shown in Table 6-17, impacts with respect to the General Plan Framework would be less than significant.

TABLE 6-17. COMPARISON OF THE PROJECT TO THE APPLICABLE LAND USE POLICIES OF THE FRAMEWORK ELEMENT

Policy	Analysis of Project Consistency
Land Use Chapter	
Goal 3A: A physically balanced distribution of land uses that contributes toward and facilitates the City's long-term fiscal and economic viability; revitalization of economically depressed areas, preservation of existing residential neighborhoods, equitable distribution of public resources, conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, assurance of environmental justice and a healthful living environment, and achievement of the vision for a more livable city.	**Consistent.** While it is the City's responsibility to meet this goal in general, the project's introduction of new residential , and commercial uses would provide new services and employment, as well as new housing opportunities. As no housing currently exists on the project site, the project would provide a substantial increase in new housing units in the vicinity. Specifically, the project would provide up to 319 new residential units in a range of sizes and pricing. Project vehicle trips would be reduced by including a mixture of land use on the project site and locating the project in an urban, mixed-use area near surrounding commercial, residential, office, and industrial uses. Furthermore, residents, visitors, and employees would have ready access to multiple nearby transit options, which include the Metro Rail Pico Station, which serves the A Line and E Line; the 7th/Metro Center Station, which serves the A Line, B Line, D line, and E Line; and the Metro Pershing Square Station, which serves the B and D lines.
Objective 3.1: Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.	**Consistent.** While it is the City's responsibility to meet this objective in general, the project would include new residential, TORS units, and commercial uses that would support the City's existing and future residents, businesses, and visitors.
Objective 3.2: Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicular trips, vehicle miles traveled (VMT), and air pollution.	**Consistent.** While it is the City's responsibility to meet this objective in general, the project would be developed at an urban infill site in close proximity to existing residential uses, businesses, services, and numerous public transportation options. Furthermore, the project would include pedestrian-friendly landscaping and design, new perimeter landscaping and street-level commercial uses that would enliven the pedestrian experience. These features would reduce work trips and encourage employees to utilize alternative modes of transportation including public transportation, walking, and bicycling.
Objective 3.4: Encourage new multifamily residential, retail commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.	**Consistent.** While it is the City's responsibility to meet this objective in general, the project would provide new residents, jobs, and services within close proximity of pedestrian, roadway, and transit networks. The new residential population would have access to commercial development on site as well as a considerable amount of retail, restaurant, and public services activities within walking distance and via bus and rail services.
Objective 3.11: Provide for the continuation and expansion of government, business, cultural, entertainment, visitor-serving, housing, industries, transportation, supporting uses, and similar functions at a scale and intensity that distinguishes and uniquely identifies the Downtown Center.	**Consistent.** While it is the City's responsibility to meet this objective in general, the project includes the expansion of business, visitor-serving, and housing uses through the provision of up to 319 multifamily residential units, up to 3,429 square feet of ground-floor commercial uses, and up to 160 TORS units. The proposed height of the building (520 feet) would also be consistent with the heights of surrounding buildings in the Downtown Los Angeles area.
Objective 3.15: Focus mixed commercial/residential uses, neighborhood-oriented retail, employment opportunities, and civic and quasi-public uses around urban transit stations, while protecting and preserving	**Consistent.** While it is the City's responsibility to meet this objective in general, the project provides residential condominium, TORS unit, and commercial uses in close proximity to a variety of transit options. Residents, visitors, and employees would have ready access to multiple nearby transit

Policy	Analysis of Project Consistency
surrounding low-density neighborhoods from encroachment of incompatible land uses.	options, which include the Metro Rail Pico Station, which serves the A Line and E Line; the 7th/Metro Center Station, which serves the A Line, B Line, D line, and E Line; and the Metro Pershing Square Station, which serves the B and D lines. Additionally, the project site is not located near any low-density neighborhoods, avoiding the encroachment of incompatible uses.
Objective 3.16: Accommodate land uses, locate and design buildings, and implement streetscape amenities that enhance pedestrian activity.	**Consistent.** While it is the City's responsibility to meet this objective in general, the project orients the residential lobby, TORS lobby, and two restaurant spaces along South Hill Street and West 11th Street and would feature large glass storefronts, distinctive residential and commercial entrances, paving treatments, seating, and landscaping along both sidewalks. South Hill Street and West 11th Street are active streets that include nearby residences, hotels, offices, restaurants, and retail uses. The project would also provide new street-level landscaping and street trees and an overall increase in landscaping on the project site. As such, the project would enhance pedestrian activity surrounding the project site.
Housing	
Goal 4A: An equitable distribution of housing opportunities by type and cost accessible to all residents of the City. **Objective 4.1:** Plan the capacity for and develop incentives to encourage production of an adequate supply of housing units of various types within each City subregion to meet the projected housing needs by income level of the future population to the year 2010. **Objective 4.2:** Encourage the location of new multifamily housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher-density developments and surrounding lower-density residential neighborhoods.	**Consistent.** No housing is currently located on the project site. The project would provide up to 319 new housing units to assist in meeting housing needs established in the periodically updated SCAG Regional Housing Needs Assessment as implemented through the Housing Element of the General Plan. The new units would include a range of sizes from studios to penthouses. The project's residential units would be provided in close proximity to several transit options. The project would be located within a dense mixed-use area, with similar uses as the project. The project would provide new residents, jobs, and services close to pedestrian, roadway, and transit networks. Residents, visitors, and employees would have ready access to multiple nearby transit options.
Economic Development	
Objective 7.6: Maintain a viable retail base in the City to address changing resident and business shopping needs.	**Consistent.** While it is the City's responsibility to meet this objective in general, the project would include 3,429 square feet of ground-floor commercial uses and up to 160 TORS units that would complement nearby commercial, office, service, industrial, and residential uses and would contribute to the economic development of the community and the City. The types of commercial uses proposed at the project site would include regional and neighborhood-serving uses, including a TORS units and restaurants/cafés for the nearby community residents and visitors.
Policy 7.2.2: Concentrate commercial development entitlements in areas best able to support them, including community and regional centers, transit stations, and mixed-use corridors. This concentration prevents commercial development from encroaching on existing residential neighborhoods.	**Consistent.** While it is the City's responsibility to meet this policy in general, the project would provide new mixed-use development in an area served by multiple transit options. Commercial uses would also be oriented to public streets. There are no exclusively residential neighborhoods in the project vicinity; the surrounding area includes a diverse mix of land uses including high- and mid-rise office buildings, residential buildings, hotels, retail and restaurant uses, museums, warehouses, and light industrial uses.
Urban Design	
Goal 5A: A livable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those	**Consistent:** While it is the City's responsibility to meet this goal in general, the project would provide a new mixed-use development that would include residential, TORS, and commercial uses. The project would increase the housing choices for residents residing in the Central City Community

Policy	Analysis of Project Consistency
neighborhoods and functions at both the neighborhood and Citywide scales.	Plan area and throughout the City of Los Angeles. The location of the project adjacent to rail and bus service would increase housing opportunities for those wishing to reside near public transportation. As such, the project would support the policy of creating a livable City for existing and future residents and attract further investment in the area.
Policy 8.3.13: Enhance pedestrian circulation in neighborhood districts, community centers, and appropriate locations in regional centers and mixed-use boulevards.	**Consistent.** The project is currently occupied by a vacant warehouse building. The project would replace this building and would activate the streetscape by creating a new mixed-use project with ground-floor commercial uses, which would consist of restaurant uses. The project would also provide new street-level landscaping and street trees and an overall increase in landscaping on the project site. As such, the project would enhance pedestrian circulation surrounding the project site.

Source: ICF 2021.

City Center Redevelopment Plan

The Redevelopment Plan for the City Center Redevelopment Project Area (City Center Redevelopment Plan or Redevelopment Project Area) was adopted on May 15, 2002 with an end date of May 15, 2032.[75] The 879-acre Redevelopment Project Area incorporates the Historic Downtown, South Park, and City Markets subareas. The Redevelopment Project Area includes portions of the former Central Business District Redevelopment Project Area, which was amended on May 1, 2002, allowing these areas to become part of the City Center Redevelopment Project Area. Because the project would not conflict with the City Center Redevelopment Plan goals, policies, and objectives as described above and shown in Table 6-18, impacts with respect to consistency with the City Center Redevelopment Plan would be less than significant.

TABLE 6-18. COMPARISON OF THE PROJECT TO THE APPLICABLE LAND USE POLICIES OF THE CITY CENTER REDEVELOPMENT PLAN

Goal/ Policy/Objective	Analysis of Project Consistency
Section 105. Project Objectives	
1. To eliminate and prevent the spread of blight and deterioration and to rehabilitate and redevelop the Project Area in accordance with this Plan.	**Consistent**: The proposed development furthers the development of Downtown as a major center of the Los Angeles metropolitan region by removing a vacant and underutilized warehouse use and replacing it with a high quality mixed use development. The project includes the development of 319 residential units, 160 TORS units, and 3,429 square feet of commercial floor area on underutilized property in South Park, a district envisioned for high-density development.
2. To further the development of Downtown as the major center of the Los Angeles metropolitan region, within the context of the Los Angeles General Plan as envisioned by the General Plan Framework, Concept Plan, City-wide Plan portions, the Central City Community Plan, and the Downtown Strategic Plan.	
3. To create an environment that will prepare, and allow, the Central City to accept that share of regional growth and development which is appropriate, and which is economically and functionally attracted to it.	**Consistent.** The project would provide a mixed-use high density development that is appropriate for growth anticipated for the Central City and is designed to be compatible with surrounding high-rise development. The housing provided by the project would support a fair share of regional growth and development.

[75] CRA/LA, City Center Redevelopment Plan, available at: http://www.crala.org/internet-site/Projects/City_Center/upload/citycenter.pdf. Accessed August 18, 2021.

Goal/ Policy/Objective	Analysis of Project Consistency
4. To promote the development and rehabilitation of economic enterprises including retail, commercial, service, sports and entertainment, manufacturing, industrial and hospitality uses that are intended to provide employment and improve the Project Area's tax base.	**Consistent.** The project would further the development and rehabilitation of businesses in Downtown by replacing a vacant warehouse with a mixture of housing, TORS units and amenities and ground floor commercial uses. The increase would support Downtown and South Park's wide variety of entertainment and cultural uses, retail businesses, restaurants, and other local businesses and services and, as such, would contribute to the rehabilitation of the area's economic enterprises.
5. To guide growth and development, reinforce viable functions, and facilitate the redevelopment, revitalization or rehabilitation of deteriorated and underutilized areas.	Consistent. The project would demolish a vacant warehouse use, and provide a modern high-rise residential, TORS, and commercial development. No existing business or residential units will be displaced. The project would provide ground level commercial uses and new TORS and residential uses that would contribute to the revitalization of the project area.
6. To create a modern, efficient and balanced urban environment for people, including a full range of around-the-clock activities and uses, such as recreation, sports, entertainment and housing.	**Consistent.** The project would provide new housing, TORS units, and commercial uses that would support a full range of around-the-clock activities and uses. The introduction of new residents within walking distance of restaurants, services, employment and entertainment uses that would generate connectivity and higher activity in the South Park area.
8. To facilitate the development of an integrated transportation system which will allow for the efficient movement of people and goods into, through and out of the Central City.	**Consistent.** Residents, visitors, and employees would have ready access to multiple nearby transit options, which include the Metro Rail Pico Station, which serves the A Line and E Line; the 7th/Metro Center Station, which serves the A Line, B Line, D line, and E Line; and the Metro Pershing Square Station, which serves the B and D lines. Additionally, the project site is not located near any low-density neighborhoods, avoiding the encroachment of incompatible uses. I-10 and I-110 are also located in close proximity to the project site. The introduction of new residents in this area would support the development of an integrated transportation system and would thus facilitate the efficient movement of goods and people through and out of the City.
9. To achieve excellence in design, based on how the Central City is to be used by people, giving emphasis to parks, green spaces, streetscapes, street trees and places designed for walking and sitting, and to develop an open space infrastructure that will aid in the creation of a cohesive social fabric	**Consistent:** The proposed TORS use will provide 24/7 operations and economic activity that contributes to constant and positive presence in the Central City. In addition, the project will improve the social fabric of South Park through provision of ground floor commercial uses, improved streetscaping, which will include widened sidewalks, and new landscaping.
13. To provide high and medium density housing close to employment and available to all ethnic, social and economic groups, and to make an appropriate share of the City's low- and moderate-income housing available to residents of the area.	**Partially Consistent.** The project's 319 proposed residential units would contribute to meeting housing needs in the City. The units would range in size, providing housing opportunities for an array of household sizes and income levels. Furthermore, the project would provide added housing by providing residential development in an area compatible with residential uses, and without displacing existing housing. The project would not require the demolition of existing housing stock serving low and moderate income households.

Source: ICF 2021.

Central City Community Plan

Adopted in 2003, and currently in the process of being updated, the Central City Community Plan (Community Plan) identifies and establishes goals and polices for land use within the Community Plan area.[76] As shown in Table 6-18, *Comparison of the Project to the Applicable Land Use Policies of the Central City Community Plan*, the project would be substantially consistent with applicable

[76] City of Los Angeles, *Central City Community Plan.* Available: https://planning.lacity.org/odocument/2ddbdde0-a8fb-46e3-a151-f52fd09cc084/Central_City_Community_Plan.pdf. Accessed: July 19, 2021.

objectives and policies of the Central Community Plan. In particular, the project would be substantially consistent with the Community Plan as follows:

- The project would include up to 319 new housing units, including studio, one-bedroom, two-bedroom, three-bedroom, and penthouse units, with substantial resident amenities. The project would be substantially consistent with objectives and policies that aim to provide housing of types, sizes, and densities required to satisfy the varying needs and desires of all segments of the community's population.
- The project would be substantially consistent with goals and policies that aim to provide a balance of development that promotes additional business and tourism uses. The project would provide up to 3,429 square feet of ground-floor commercial uses and up to 160 TORS units which would serve the needs of visitors or short terms workers to downtown, and would create an active downtown environment for current residents.

Because the project would not conflict with the Central Community Plan goals, policies, and objectives as described above and shown in Table 6-19, impacts with respect to consistency with the Central Community Plan would be less than significant.

TABLE 6-19. COMPARISON OF THE PROJECT TO THE APPLICABLE LAND USE POLICIES OF THE CENTRAL CITY COMMUNITY PLAN

Goal/ Policy/Objective	Analysis of Project Consistency
Residential	
Objective 1-1: To promote development of residential units in South Park. **Objective 1-2:** To increase the range of housing choices available to Downtown employees and residents. **Objective 1-3:** To foster residential development, which can accommodate a full range of incomes.	**Consistent.** The provision of residential development in South Park supports walkable accessibility to surrounding entertainment districts and the financial district, thus reducing the use of private vehicles for activities, creates symbiotic relationships that contribute to the vibrancy of Central City area and provides increased density to support the use of public transportation**.** The project would provide up to 319 multifamily residential units in the South Park neighborhood, including studios, one-bedrooms, two-bedrooms, three-bedrooms, and penthouse units, at varied rates contributing to the overall housing stock available within the City. The project would serve to increase the range of available housing choices to downtown employees and residents and could accommodate a range of income levels.
Commercial	
Objective 2-1: To improve Central City's competitiveness as a location for offices, business, retail, and industry. **Objective 2-3:** To promote land uses in Central City that will address the needs of all the visitors to Downtown for business, conventions, trade shows, and tourism. **Objective 2-4:** To encourage a mix of uses which create an active, 24-hour downtown environment for current residents and which would also foster increased tourism.	**Consistent.** The project would provide up to 3,429 square feet of ground-floor commercial uses and up to 160 TORS units. The TORS use would address the need for more accommodations for visitors in downtown related to business, conventions, trade shows, and tourism. The ground-floor commercial uses would consist of restaurant uses, which would contribute to an active downtown environment for current residents and visitors to the area.
Open Space and Recreation	
Objective 4-1: To encourage the expansion and additions of open spaces as opportunities arise. **Policy 4-4.1:** Improve Downtown's pedestrian environment in recognition of its	**Consistent.** The project would provide 55,706 square feet of open space through a combination of common indoor open space, common outdoor open space, and private balconies. Indoor residential amenity spaces would include a gym, a health spa, a lounge room, clubhouse, a combined dining/lounge function room, changing rooms, and lobby

Goal/ Policy/Objective	Analysis of Project Consistency
important role in the efficiency of Downtown's transportation and circulation systems and in the quality of life for its residents, workers, and visitors.	areas. On levels 5 and 40, outdoor amenities such as a pool and roof deck would be provided, for a total of 20,555 sf. The project would also provide 19,451 sf of common indoor open space, and 15,700 sf of private balconies. The project also proposes to plant 120 trees o**n the project site**, remove one of the six existing street trees along the project site and replace the one tree with two new street trees along South Hill Street which would enhance the pedestrian environment around the project site.
Police Protection	
Policy 5-2.1: Promote the safety and security of personal property through proper design and effective use of the built environment, which can lead to a reduction in the incidence and fear of crime, reduction in calls for police service, and to an increase in the quality of life.	**Consistent.** The project would include design features to enhance safety around the project site, such as new lighting and signage. Outdoor areas would be exposed to windows and allow for natural surveillance, interior and exterior spaces would be well lit with proper signage to direct flow of people and decrease opportunities for crime, building access/design would be secured to all areas, building entryways would be well-lit, staff would be trained in safety and sound security policies, and entrances and exits of the building would be monitored. By reducing demand for police services, existing facilities can better support the needs of the community, while avoiding the construction of new facilities.

Source: ICF 2021.

Los Angeles General Plan Housing Element

The Housing Element of the General Plan is prepared and updated pursuant to state law and provides planning guidance in meeting the housing needs identified in SCAG's Regional Housing Needs Assessment (RHNA). The Housing Element identifies the City's housing conditions and needs, establishes the goals, objectives, and policies that are the foundation of the City's housing and growth strategy, and provides the array of programs the City intends to implement to create sustainable, mixed-income neighborhoods.

The 2021-2029 Housing Element was adopted by the City Council on November 24, 2021.[77] The City's 2021-2029 Housing Element must accommodate a 6th cycle RHNA allocation of 456,643 new housing units of which 184,721 units (40 percent) are designated for very low and low-income households, 75,091 units are for moderate income households (17 percent), and 196,831 units (43 percent) would be for above moderate-income households. These figures are more than five times higher than the prior 5th RHNA cycle allocation. This significant increase is primarily the result of changes in state law that included new markers of existing housing needs such as overcrowding and cost burden in the RHNA. The City's approach to meeting the City's housing needs is to facilitate the development of creating sustainable mixed-use, mixed-income neighborhoods across the City and to provide for housing, jobs, transit and basic amenities for all segments of the population.

[77] City of Los Angeles. *General Plan Housing Element.* Available https://planning.lacity.org/plans-policies/housing-element. Accessed: December 14, 2021.

The Housing Element goals related to the project include:

- **Goal 1:** A City where housing production results in an ample supply of housing to create more equitable and affordable options that meet existing and projected needs.

- **Goal 2:** A City that preserves and enhances the quality of housing and provides greater housing stability for households of all income levels.

- **Goal 3**: A City in which housing creates healthy, livable, sustainable, and resilient communities that improve the lives of all Angelenos.

The project would remove an existing, underutilized, vacant warehouse and redevelop the project site with a mixed-use development that would increase the housing stock in Downtown Los Angeles by offering up to 319 new residential units in a mix of studio, one-bedroom, two-bedroom, three-bedroom, and penthouse units. All units would be market-rate units, but the mixture of different unit types at varied rates would provide variety for different income levels and household sizes and contribute to the range of housing choices available in Downtown Los Angeles. Furthermore, as part of the Transfer of Floor Area Ratio (TFAR) entitlement, the project would make a substantial Public Benefit Payment (PBP), which the City can utilize for the provision and preservation of affordable housing. The project would prevent the spread of blight and deterioration by redeveloping the underutilized site with a mixture of housing. Thus, the project would support the above Los Angeles General Plan Housing Element goals and in meeting the City's RHNA allocations by contributing to the overall supply of housing. Furthermore, the project would provide these new units close to multiple transit options that serve the greater Los Angeles region. Therefore, the project would be substantially consistent with the Los Angeles General Plan Housing Element and impacts would be less than significant.

City of Los Angeles Mobility Plan 2035

Mobility Plan 2035 (Mobility Plan),[78] which was adopted in January 2016, is a comprehensive update of the Transportation Element, which in part includes the City's classification system for roadways. The Mobility Plan provides revised street standards in an effort to provide a more enhanced balance between traffic flow and other important street functions, including transit routes and stops, pedestrian environments, bicycle routes, building design, and site access. Various modes of travel are encouraged by the Mobility Plan, including walking, biking, and using public transit.

Key objectives within the Mobility Plan are as follows:

- **Policy 2.3:** Recognize walking as a component of every trip and ensure high-quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.

[78] City of Los Angeles. *Mobility Plan 2035, An Element of the General Plan*. Available: https://planning.lacity.org/plans-policies/housing-element-update#draft-plan Accessed: July 19, 2021

- **Policy 3.1:** Recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes—including goods movement—as integral components of the city's transportation system.

- **Policy 3.3:** Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.

- **Policy 3.4:** Provide all residents, workers, and visitors with affordable, efficient, convenient, and attractive transit services.

- **Policy 3.8:** Provide bicyclists with convenient, secure, and well-maintained bicycle parking facilities.

- **Policy 4.13:** Balance on-street and off-street parking supply with other transportation and land use objectives.

- **Policy 5.2:** Support ways to reduce vehicle miles traveled (VMT) per capita.

- **Policy 5.4:** Continue to encourage the adoption of low and zero emission fuel sources, new mobility technologies, and supporting infrastructure.

The project would support the Mobility Plan policies listed above, as it promotes a balanced transportation system by locating a mixed-use project on an urban infill site in an area that has an existing mix of commercial, residential, office, and service uses. The project site is also located within a TPA and is within close proximity to multiple transit options, as it is less than 0.3 mile northeast of the Metro Rail Pico Station, which serves the A Line and E Line; approximately 0.7 mile southeast of the 7th/Metro Center Station, which serves the A Line, B Line, D line, and E Line; and approximately 0.8 mile south of the Metro Pershing Square Station, which serves the B and D lines. The project encourages pedestrian and bicycle activity by locating new residents, employees, and visitors in close proximity to public transit and services. Project residents, employees, patrons, and visitors would have the option to walk, ride bicycles, or use public transit to access jobs and services in the surrounding neighborhood.

The project would provide bicycle parking for residential and commercial uses, adhering to the code requirements for bicycle parking. As such, the project would provide convenient, secure, and well-maintained bicycle parking facilities that would encourage the use of bicycles by project residents, patrons, and visitors and a reduction in the use of vehicular travel.

Because the project would be consistent with these applicable policies of the Mobility Plan, impacts would be less than significant. Additional discussion of the Mobility Plan is provided in Section 6.17, *Transportation*.

City of Los Angeles General Plan Noise Element (1999)

The City of Los Angeles General Plan Noise Element references the City's noise standards, which are contained in LAMC Section 111.[79] The Noise Element addresses noise issues, noise sources, and contains noises guidelines, mitigation strategies, and regulations. The project's compliance with the Noise Element is described in Section, 6.13, *Noise,* of this SCEA. Based on the information contained in Section 6.13, the project would be consistent with the applicable policies and standards of the Noise Element, and impacts would be less than significant.

Health and Wellness Element (Plan for a Healthy Los Angeles)

The Plan for a Healthy Los Angeles, the Health and Wellness Element of the City's General Plan, provides high-level policy vision, along with measurable objectives and implementation programs to elevate health as a priority for the City's future growth and development. The Plan includes the following seven goals: (1) Los Angeles, A Leader in Health and Equity; (2) A City Built for Health; (3) Bountiful Parks and Open Spaces; (4) Food that Nourishes the Body, Soul, and Environment; (5) An Environment Where Life Thrives; (6) Lifelong Opportunities for Learning and Prosperity; and (7) Safe and Just Neighborhoods. As such, the provisions of this plan element address a number of policies not directly tied to the physical environment. However, included within this General Plan element are policies pertaining to the arrangement of land uses within the City and building design procedures.

Because the project would not conflict with the Plan for a Healthy Los Angeles policies as shown in Table 6-20 impacts with respect to consistency with the Plan for a Healthy Los Angeles would be less than significant.

TABLE 6-20. COMPARISON OF PROJECT CHARACTERISTICS TO APPLICABLE POLICIES OF THE HEALTH AND WELLNESS ELEMENT

Plan Policies	Analysis of Project Consistency
Policy 2.2 Healthy Building Design and Construction. Promote a healthy built environment by encouraging the design and rehabilitation of buildings and sites for health living and working conditions, including promoting enhanced pedestrian-oriented circulation, lighting, attractive and open stairs, healthy building materials and universally accessibility using existing tools, practices, and programs	The project would be near public multiple transportation options, place housing near jobs and transit, and provide ample bicycle parking and pedestrian infrastructure to incentivize increased biking and walking. The project would encourage pedestrian travel by incorporating new residential and commercial uses in its mixed-use development and locating this development on a site located within walking distance of businesses in the area, as well as within close proximity to multiple transit options. Furthermore, the project would include pedestrian-friendly landscaping and design, new perimeter streetscape improvements, and street level commercial uses that would enliven the pedestrian experience The project would be required to comply with California Title 24 Building Standards Code and CALGreen Code. Energy saving and sustainable design would be incorporated throughout the project. The project would emphasize energy conservation, which would be achieved through the use of energy efficient HVAC and lighting systems. In addition, of the 30 percent of the parking

[79] City of Los Angeles. *Noise Element*. Available: https://planning.lacity.org/odocument/b49a8631-19b2-4477-8c7f-08b48093cddd/Noise_Element.pdf. Accessed: May 6, 2021.

Plan Policies	Analysis of Project Consistency
	spaces that would be prewired for charging, 10 percent would have chargers installed for immediate use by EVs.
Policy 5.1 Air Pollution and Respiratory Health: Reduce. Air pollution from stationary and mobile sources; protect human health and welfare and promote improved respiratory health	The project would include characteristics and design features that support reductions in air emissions and encouragement of alternative modes of transportation, as discussed more fully in Sections 6.3, *Air Quality*, and 6.7, *Greenhouse Gas Emissions*, of this SCEA. The project would provide residential uses and employment opportunities in proximity to job centers in Los Angeles where people can live and work and have access to convenient modes of transportation that provides options for reducing reliance on automobiles and minimizing associated air pollutant emissions. The project would be required to comply with California Title 24 Building Standards Code and CALGreen Code. Energy saving and sustainable design would be incorporated throughout the project. The project would emphasize energy conservation, which would be achieved through the use of energy efficient HVAC and lighting systems. In addition, of the 30 percent of the parking spaces that would be prewired for charging, 10 percent would have chargers installed for immediate use by EVs.
Policy 5.7 Land Use Planning for Public Health and GHG Emission Reduction. Promote land use policies that reduce per capita greenhouse gas emissions, result in improved air quality and decreased air pollution, especially for children, seniors and others susceptible to respiratory diseases.	The project would be consistent with SCAG RTP/SCS goals and objectives under SB 375 to implement "smart growth." The project is consistent with the City's Land Use Plans (in particular the General Plan Framework and the Community Plan), which support a population distribution pattern that increases population density in the Downtown Center and within a TPA, thus supporting the use of alternative transportation that could help reduce GHG emissions from private automobile travel.

Source: ICF, 2021

Downtown Design Guide

The project is located within the boundaries of the Downtown Design Guide (DDG) in the South Park District. The DDG supplements LAMC provisions and applies to all projects within its boundaries. The DDG contains standards and guidelines for sustainable design, sidewalks and setbacks, ground floor treatment, parking and access, massing and street wall, on-site open space, architectural detail, streetscape improvement and signage prepared at a finer grain specifically for the Downtown neighborhood districts.

The DDG encourages Downtown Los Angeles to develop as a more sustainable community with an emphasis on walkability and the making of great streets, districts and neighborhoods. The focus of the DDG is the relationship of the buildings to the street, including sidewalk treatment, and the character of the building as it adjoins the sidewalk and connections to transit. The DDG is not intended to be applied so rigidly that they impede good development. Rather, recognizing that every development site is unique, the DDG—"in the spirit of affording maximum creativity"—states the intention to allow for flexibility for "projects that do not adhere to the letter of every provision in the Design Guide, but none-the-less demonstrate a clear alternative approach which is superior to and achieves all the prominent objectives of the Design Guide." The project complies with the standards and guidelines set forth in the DDG as noted in Table 6-21 below, and respects and meets the DDG policies and intent. Key items that require further justification in relation to the project have been elaborated on in Table 6-21 below.

TABLE 6-21. CHECKLIST JUSTIFICATIONS WITH APPLICABLE STANDARDS/GUIDELINES OF THE DOWNTOWN DESIGN GUIDE

Goal/ Policy/Objective	Analysis of Project Consistency
Sustainable Design	
(2.D.2) Re-uses and integrates existing structures into new projects to retain the architectural fabric of Downtown, wherever possible.	The existing structure on the project site is an unoccupied warehouse, devoid of any significant architectural or cultural contribution to the fabric of Downtown Los Angeles.
Sidewalks and Setbacks	
(3.A.2) If a building projects over required sidewalk easement, projects at height of at least 40' or less than 5' to accommodate street trees. (Excepting projections permitted in public ROW by the Municipal Code, such as signs canopies, and awnings.) The DDG encourages creativity and innovation and recognizes flexibility in determining compliance with the DDG. More specifically, DDG Section 1.B authorizes alternative means of compliance so long as the project is found to comply with the overall objectives of the DDG.	While, the feature building awning would project three feet over the required sidewalk easement, starting at a height of 17 feet above grade, the project would comply with the alternative means of compliance authorized by the DDG. The feature awning will serve as a prominent architectural feature of the overall project design, would appropriately accommodate street trees, and would contribute to, and enhance, the pedestrian experience and streetscape character. The awning will be designed with timber-like beams that will extend horizontally from the building façade at varying lengths to undulate and accommodate the locations of street tree canopies. Above the awning, timber-like beams with vertical landscaping woven into the design will seamlessly extend vertically to screen auto parking. The projection allows a structural connection to the feature awning, and at a lower height provides a more pedestrian friendly scale, able to be experienced by pedestrians, and providing shelter and shade to the sidewalk. Additionally, the feature awning varies in height and projection; the intent is to enhance the experience and architecture, simultaneously corresponding and accommodating the locations of street trees, creating a visually interesting architectural feature that enhances the public realm. The Applicant proposes to provide a Covenant and Agreement Regarding the Maintenance of all Street Trees. The Covenant and Agreement will run with the land and will be binding on current and all future owners and will continue in effect until released by the Authority of the Superintendent of Building of the City of Los Angeles. The proposed mixed-use tower's design excellence, concealment of the parking podium and accommodation of the street trees (with permanent continued maintenance by property owner) provides a clear alternative approach for conformance with Section 3.A.2 Sidewalks and Setbacks and supports the DDG's encouragement of creative and innovative architecture.
Ground Floor Treatment	
Ground Floor Treatment Along Retail Streets (4.A.2) If the project is on a Retail Street, designs ground floor space with a linear frontage equal to at least 50% or 75% of street frontage, as specified in Figure 3-1, to accommodate retail, professional office and live-work uses.	11th Street is a Retail Street. 11th Street has an active use of 82%. Collectively, the active uses of both 11th and Hill Streets total 89%. Additionally, the non-active use portion of 11th street is proposed to seamlessly integrate to the façade design and ground floor storefront. Due to constraints with a small site, and project utility requirements, the generator room, a non-active use is buffered from the street by a storefront display.
Ground Floor Treatment: "Back of House" Uses (4.C.8) Does not locate electrical transformers, mechanical equipment and other equipment along the ground floor street wall.	Back of House uses, such as main electrical room and generator room are set back away from ground floor street walls to allow for storefront display and active uses to continue the façade design; thereby reducing retail street impact and enhancing pedestrian experience without interrupting proposed architecture.

Goal/ Policy/Objective	Analysis of Project Consistency
Parking and Access	
(5.A.4) If parking above the ground floor that is not lined with habitable space is permitted, includes a maximum three parking levels fronting on a public street above the ground floor (provided parking levels are integrated into the design of the building façade and at least one habitable floor is provided directly above the visible parking levels).	In order to maintain the intent of the DDG and to promote and contribute to an activated and pedestrian friendly ground floor, the parking area is completely concealed from view with a highly articulated and integrated façade system. The project would feature an innovative awning design at the ground level. The awning would serve as a prominent architectural feature of the overall design that will provide shade and engage pedestrians at the street level. Above the awning, vertical timber-like beams will seamlessly extend vertically to screen vehicle parking on Levels three and four. Integrated with the beams, layers of opaque glazing, vertical fins, and landscaping will extend upwards, effectively screening the vehicles and preventing spillover lighting.
Drop Off Areas (5.A.6) If providing a drop-off area, including residential, hotel, and restaurant drop-off, provides it: 1) within the off-street parking facilities using the parking access, or 2) along the required curb line where there is a full-time curbside parking lane, with no sidewalk narrowing. (Exception: where there is no curbside parking lane and off-street drop-off is not feasible, a hotel may have drop-off lane up to 80 feet long provided the required sidewalk width is maintained.)	A drop-off would be provided on 11th Street in front of the TORS entrance along the required curb line where there is a full-time curbside parking lane, with no sidewalk narrowing. All other vehicular loading will be located in the proposed carpark on the ground floor.
Architectural Detail	
Security Grilles and Roll-Down Doors and Windows (8.G.1). Does not include exterior roll-down doors and security grilles, with the exception of interior roll-down doors and security grilles, provided they are at least 75% transparent (open), retractable and designed to be fully screened from view during business hours.	There are no exterior/interior roll-down doors or grilles facing 11th and Hill Street. For security at the alley, there are security grilles and roll-down doors proposed at alley facing entries for the garage, back-of- house uses Loading/Service Dock, and utility and generator room. These are located away from public street view.

Los Angeles Municipal Code

Density, Zoning, and General Plan Land Use Designations

The project site is located within the Central City Community Plan Area and is designated with the Regional Center Commercial Land Use category of the City's General Plan and with a corresponding zoning of C2-4D-O (Commercial, Height District 4 with Development "D" Limitation, Oil Drilling Supplemental Use District) which permits various commercial uses (inclusive of restaurants, hotels, and TORS subject to a conditional use permit) as well as multi-family residential uses. The proposed project's mixture of commercial and residential uses would be consistent with the uses permitted by the LAMC on the project site.

Height District 4 within the C2 Zone does not impose any height limit and normally establishes a maximum FAR of 13:1. However, the maximum permitted FAR on the project site is restricted to 6:1 by the "D" Limitation other than under certain enumerated exceptions, such as when utilizing the City's Transfer of Floor Area Rights (TFAR) program. The project would utilize the TFAR program and include TFAR greater than 50,000 square feet. The Applicant is requesting the transfer of 327,487 square feet of floor area for a total of 491,977 square feet of floor area. This equals an 11.34:1 FAR in lieu of the 6:1 FAR otherwise normally regulated by the "D" Limitation. The

project, with approval of the TFAR request, would be consistent with the maximum FAR permitted on the project site.

The Greater Downtown Housing Incentive Area (LAMC Section 12.22.C.3.) provides a list of incentives to increase housing opportunities including eliminating LAMC yard requirements and allowing an unlimited amount of dwelling units or guest rooms (subject to the physical constraints of the allowable maximum FAR) contingent on the total floor area utilized by guest rooms not exceeding the total floor area utilized by dwelling units. The project complies with this requirement that the total floor area utilized by dwelling units is greater than that utilized by guest rooms.

In sum, the project would be a mixed-use 40-story (520-foot) building with 319 residential condominium units; 160 TORS units; and approximately 3,429 square feet of ground floor commercial accommodating two restaurants and is consistent with the general provisions and area requirements of the LAMC. The proposed development would be within the allowable FAR for the project site. Thus, the project would be consistent with the LAMC density, zoning, and use requirements.

Open Space

Based on the maximum 319 residential condominium units and 160 TORS units proposed, the project would be required to include 55,575 sf of open space. The project would fulfill this requirement by providing 55,706 sf of open space through a combination of 20,555 sf of common exterior open space (open to the sky), 19,451 sf of common indoor open space, and 15,700 sf of private balconies open space. A total of 102 of the 160 TORS units would have a private balcony, and 212 of the 319 residential condominiums would have a private balcony. As part of the open space requirements, the project includes planting trees at a rate of one tree for every four dwelling units, which requires 120 trees be planted on-site. Thus, the project would be consistent with the open space requirements of the LAMC.

Conclusion

The project would not 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, and impacts would be less than significant. No mitigation measures would be required.

Cumulative Impacts: Land Use and Planning

Related projects would be located primarily within the Central City Community Plan area and would have access or be in close proximity to transit. The intensification of development within this area would be consistent with the intent of the General Plan Framework, which encourages a diversity of uses, including restaurants, commercial, and residential uses, in close proximity to transit. In addition, many related projects feature mixed-use components that provide housing, office, and street-oriented commercial uses that would enliven the street front and enhance pedestrian activity in accordance with the objectives of the General Plan Framework and other adopted plans. Because it is anticipated that development of the related projects would be consistent with the objectives of the General Plan and other plans that support intensification and redevelopment, land use impacts would be less than significant. Any related projects requesting

discretionary approvals, such as changes to the General Plan or zoning, would be vetted through environmental review and only allowed at the discretion of the City and with consideration of consistency with applicable plans.

The related projects are located in urbanized areas that are nearly fully developed where, therefore, most opportunities to build involve infill development or reusing previously developed property. As both the project and the related projects constitute infill development and would increase density, together they would not alter existing basic land use patterns.

The project would be consistent with the policies and objectives of the Los Angeles Framework Element, Los Angeles General Plan Housing Element, Los Angeles General Plan Noise Element, Los Angeles General Plan Mobility Plan 2035, the SCAG's 2020-2045 RTP/SCS, the Central City Community Plan, and the LAMC. Specifically, the project is consistent with goals and policies contained within these plans that aim to provide new housing, improve the pedestrian environment, support mixed-use development near transit, improve air quality and active transportation (e.g., bicycling and walking), and encourage new high-quality development that is compatible with existing uses and development.

Conclusion

Cumulative land use and planning impacts would be less than significant and would not be cumulatively considerable. No mitigation measures would be required.

6.12 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?	☐	☐	☐	☒

Would the project:

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

No Impact. The project site is within the Central City Community Plan and is designated as Regional Center Commercial, which corresponds to the property's current zoning of C2-4D-O (Commercial, Height District 4 with Development "D" Limitation, Oil Drilling Supplemental Use District). Oil resource areas are designated as Oil Drilling Districts or State Designated Oil Fields, which often overlap. Generally, State Designated Oil Fields are broader than the drilling districts and follow specific streets and other geographic markers.

As identified in the City of Los Angeles General Plan, Conservation Element, 2001, Appendix A, there are no mineral resources located on the project site but the project is located in an "Oil Drilling District" and on "State Designed Oil Fields." [80] In addition, as shown in the Los Angeles General Plan Safety Element, Exhibit E, Oil Field and Oil Drilling Areas, and as identified in the Geotechnical Investigation,[81] the project site is located within a Los Angeles City Oil Drilling District, the LA Downtown Oil Field.[82] This denotes an area in which the drilling of oil wells or the production from the wells of oil, gases or other hydrocarbon substances is permitted.

As noted in the Phase I ESA,[83] no oil or gas wells are located on the project site or have been historically located on the project site, and as a mixed-use project, implementation of the project would not involve any oil, gas, or mineral extraction uses. As the project site does not have contain any known oil wells and the project site has not been used for mineral extraction and does not

[80] City of Los Angeles General Plan, Conservation Element, 2001. Appendix A. https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation_Element.pdf, Accessed August 16, 2021.

[81] Preliminary Site Geotechnical and Geologic Assessment Report for Proposed 40-Story Hi-Rise Mixed-Use Development Project 1101-1115 S. Hill Street and 206-210 W. 11th Street, Los Angeles, California, (Geotechnical Investigation) dated August 16, 2021.

[82] Los Angeles General Plan Safety Element, 1996, Exhibit E, Oil Field and Oil Drilling Areas. https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf. Accessed August 16, 2021.

[83] Phase I Environmental Site Assessment (Phase I ESA) prepared by PIC Environmental Services dated February 19, 2019.

include any oil or mineral extraction uses, the project would not result in the loss of availability of known mineral resources.

Conclusion

There would be no impact to mineral resources and no mitigation measures are required.

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

No Impact. In addition to oil and gas resources, mineral resources of local value in the City of Los Angeles include sand and gravel deposits and mining operations. Sand and gravel resources and mining operations are concentrated in the Sylmar community of the north San Fernando Valley.[84] Sand and gravel resources do not occur in the section of the Los Angeles basin occupied by the project site. Because the project would not encroach on the City's existing sand and gravel mining operations or known sand and gravel resources, it would not result in the loss of availability of these locally important mineral resources. Therefore, there would be no impact to locally-important mineral resources.

Cumulative Impacts: Mineral Resources

Because of the large number and broad extent of City oil drilling districts and State-designated oil fields in the project study area, including the LA City Oil Drilling District and its respective State Designated Oil Field, some of the related projects would be located within these designated areas. However, with implementation new methodologies, such as slant drilling, related projects would not substantially reduce extraction capabilities, impede exploratory operations, or would cumulatively result in the significant loss of availability of oil resources. As discussed above, the project would have a no impact on mineral resources. As the project would have no incremental contribution to the potential cumulative impact on mineral resources, the project's impact would not be cumulatively considerable and the cumulative impact would be less than significant.

Conclusion

As discussed above, the project would have no impact on mineral resources and the project's contribution to a cumulative impact would not be cumulatively considerable. There would be no impact and no mitigation measures are required.

[84] City of Los Angeles General Plan, Conservation Element, 2001. Appendix A. https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation_Element.pdf, Accessed August 16, 2021.

6.13 Noise

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:					
a.	Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in a local general plan or noise ordinance or applicable standards of other agencies?	☐	☒	☐	☐
b.	Generate excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c.	Be 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 and expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

The analysis is based on the information provided in the project-specific Noise Technical Report contained in Appendix H.

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?

Less Than Significant with Mitigation Incorporated. A significant impact may occur if the project would generate noise levels during construction and operations that exceed the applicable noise level standards set forth in the City's General Plan Noise Element and LAMC. The following analysis evaluates the potential noise impacts at nearby noise-sensitive land uses and sensitive receptors resulting from construction and operation of the project. As discussed below, implementation of mitigation measures would ensure a less-than-significant impact with respect to construction, while operational noise impacts would be less than significant without mitigation.

Noise Fundamentals

Sound can be described as the mechanical energy of a vibrating object transmitted by pressure waves through a liquid or gaseous medium (e.g., air) to a hearing organ, such as a human ear. Noise is often defined as sound that is objectionable because it is unwanted, disturbing, or annoying. In the science of acoustics, the fundamental model consists of a sound (or noise) source, a receptor, and the propagation path between the two. The loudness of the noise source and the obstructions or atmospheric factors, which affect the propagation path to the receptor, determine the sound level and the characteristics of the noise perceived by the receptor.

Frequency, Amplitude, and Decibels

Continuous sound can be described by its *frequency* (pitch) and *amplitude* (loudness). A low-frequency sound is perceived as low in pitch; a high-frequency sound is perceived as high-pitched. Frequency is expressed in terms of cycles per second, or Hertz (Hz) (e.g., a frequency of 250 cycles per second is referred to as 250 Hz). High frequencies are sometimes more conveniently expressed in kilohertz (kHz), or thousands of Hz. The audible frequency range for humans is generally between 20 Hz and 20,000 Hz.

The amplitude of pressure waves generated by a sound source correlates with the loudness of that source. The amplitude of a sound is typically described in terms of *sound pressure level* (SPL), also referred to simply as the sound level. The SPL refers to the root-mean-square (rms)[85] pressure of a sound wave and is measured in units called microPascals (µPa). One µPa is approximately one hundred-billionth of normal atmospheric pressure. Sound pressure amplitudes for different kinds of noise environments can range from less than 100 to over 100,000,000 µPa. Because of this large range of values, sound is rarely expressed in terms of µPa. Instead, a logarithmic scale is used to describe the SPL in terms of decibels, abbreviated dB. The decibel is a logarithmic unit that describes the ratio of the actual sound pressure to a reference pressure (20 µPa is the standard reference pressure level for acoustical measurements in air).

Because decibels represent noise levels using a logarithmic scale, SPLs cannot be added, subtracted, or averaged through ordinary arithmetic. On the dB scale, a doubling of sound energy corresponds to a 3-dB increase. In other words, when two identical sources are each producing sound of the same loudness, their combined sound level at a given distance would be 3 dB higher than one source under the same conditions. For example, if one bulldozer produces an SPL of 80 dB, two bulldozers would not produce a combined sound level of 160 dB. Rather, they would combine to produce 83 dB. The cumulative sound level of any number of sources, such as excavators, can be determined using decibel addition.

The dB scale alone does not adequately characterize how humans perceive noise. Human hearing is limited in the range of audible frequencies as well as in the way it perceives the SPL in that range. In general, people are most sensitive to the frequency range of 1,000 to 8,000 Hz and perceive sounds within that range better than sounds of the same amplitude at higher or lower frequencies. To approximate the response of the human ear, sound levels of individual frequency bands are weighted (i.e., adjusted), depending on human sensitivity to those frequencies. The resulting SPL is expressed in A-weighted decibels, or dBA. The A-weighting scale approximates the frequency response of the average young ear when listening to most ordinary sounds.

[85] Root-mean-square (rms) is defined as the square root of the mean (average) value of the squared amplitude of the noise signal.

Noise Descriptors

Because sound levels can vary markedly over a short period of time, various descriptors or noise "metrics" have been developed to quantify environmental and community noise. These metrics generally describe either the average character of the noise or the statistical behavior of the variations in the noise level. Some of the most common metrics used to describe environmental noise, including those metrics used in this report, are described below.

- **Equivalent Sound Level (L_{eq})** is the most common metric used to describe short-term average noise levels. Many noise sources produce levels that fluctuate over time; examples include mechanical equipment that cycles on and off, or construction work, which can vary sporadically. The L_{eq} describes the average acoustical energy content of noise for an identified period of time, commonly 1 hour. Thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustical energy over the duration of the exposure. For many noise sources, the L_{eq} will vary, depending on the time of day. A prime example is traffic noise, which rises and falls, depending on the amount of traffic on a given street or freeway.

- **Maximum Sound Level (L_{max})** and **Minimum Sound Level (L_{min})** refer to the maximum and minimum sound levels, respectively, that occur during the noise measurement period. More specifically, they describe the rms sound levels that correspond to the loudest and quietest 1-second intervals that occur during the measurement.

- **Percentile-Exceeded Sound Level (L_{xx})** describes the sound level exceeded for a given percentage of a specified period. For example, the L_{50} is the sound level exceeded 50 percent of the time (such as 30 minutes per hour), and L_{25} is the sound level exceeded 25 percent of the time (such as 15 minutes per hour).

- **Community Noise Equivalent Level (CNEL)** is a measure of the 24-hour average A-weighted noise level that is also time-weighted to "penalize" noise that occurs during the evening and nighttime hours when noise is generally recognized to be more disturbing (because people are trying to rest, relax, and sleep during these times). In order to account for this in calculating the CNEL, 5 dBA is added to the L_{eq} during the evening hours of 7 p.m. to 10 p.m.; 10 dBA is added to the L_{eq} during the nighttime hours of 10 p.m. to 7 a.m.; and the energy average is then taken for the whole 24 hour day.

- **Day-Night Sound Level (L_{dn})** is similar to the CNEL described above. L_{dn} is also a time-weighted average of the 24-hour A-weighted noise level. The only difference is that no "penalty" is applied to the evening hours of 7 p.m. to 10 p.m. 10 dBA is added to the L_{eq} during the nighttime hours of 10 p.m. to 7 a.m., and the energy average is then taken for the whole 24-hour day.

Relevant Noise Regulations

City of Los Angeles Municipal Code

The following is a discussion of the relevant noise regulations and standards established under the LAMC that would be applicable to the project.

Construction Noise

Section 41.40(a) of the LAMC prohibits the use, operation, repair, or servicing of construction equipment, as well as job-site delivery of construction materials, between the hours of 9:00 p.m. and 7:00 a.m. where such activities would disturb "persons occupying sleeping quarters in any dwelling hotel or apartment or other place of residence." Under Section 41.40(b), construction noise emanating from property zoned for manufacturing or industrial uses is exempted from the Section 41.40(a) standards. Additionally, Section 41.40(b) also states that construction, repair, or excavation work occurring outside of the permitted hours identified in Section 41.40(a) is allowed if written permission from the Board of Police Commissioners (through its Executive Director) is obtained. In particular, permission can be granted in instances where the construction work is deemed to be in the public interest, or where hardship or injustice, or unreasonable delay would result from its interruption outside of the permitted hours identified in Section 41.40(a). In addition, Section 41.40(c) prohibits construction, grading, and related job-site deliveries on or within 500 feet of land developed with residential structures before 8:00 a.m. or after 6:00 p.m. on any Saturday or national holiday or at any time on Sunday.

Section 112.05 of the LAMC places a noise level limit of 75 dBA at a distance of 50 feet for powered equipment or tools, which includes construction equipment in, or within 500 feet of, any residential zone between the hours of 7 a.m. and 10 p.m. Under the code, such limits shall not apply where compliance is technically infeasible. Technical infeasibility means that the noise limit cannot be achieved despite the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques during operation of the equipment. Section 111.02 of the LAMC provides guidance on conducting sound level measurements pursuant to City noise regulations. The guidance from this section states, in part:

> *"…the level of a particular noise being measured shall be the numerical average of noise measurements taken at a given location during a given time period."*

The LAMC does not state a specific averaging time to be used for a noise measurement conducted pursuant to City noise regulations. However, as indicated in Section 111.02(b) of the LAMC in regard to sound level measurement procedure and criteria, the City references a period of "60 consecutive minutes" as a criterion in assessing an alleged offensive noise. Therefore, for the purpose of assessing construction activities, the L_{eq} for a 1-hour period is appropriate to assess project impacts.

Operational Noise

Chapter XI, *Noise Regulation (Noise Ordinance)*, of the LAMC regulates noise from non-transportation noise sources such as commercial or industrial operations, mechanical equipment, or residential activities. Although these regulations do not apply to vehicles operating on public rights-of-way, it is noted that they do apply to noise generated by vehicles on private property, such as in parking lots or parking structures. The exact noise standards vary, depending on the type of noise source; however, the allowable noise levels are generally determined relative to the existing ambient noise levels at the affected location. Section 111.01(a) defines ambient noise as "the composite of noise from all sources near and far in a given environment, exclusive of occasional

and transient intrusive noise sources and the particular noise source or sources to be measured. Ambient noise shall be averaged over a period of at least 15 minutes."

Section 111.02 provides procedures and criteria for measuring the sound level of noise sources that are alleged to be "offending." Section 111.02 states that under conditions where noise alleged to be offending occurs for more than five but less than 15 minutes in any 1-hour period between the hours of 7:00 a.m. and 10:00 p.m. of any day, a five dBA allowance should be provided to the noise source (i.e., a value of -5 dBA would be added to the sound level measurement of the offending noise source). Additionally, under conditions where the offending noise occurs for five minutes or less in any 1-hour period between the hours of 7:00 a.m. and 10:00 p.m. of any day, an additional five dBA allowance can be provided to the noise source. However, under conditions where the offending noise source generates either repeated impulsive noise levels or steady-tone noise levels with an audible fundamental frequency or overtones (except for noise emanating from any electrical transformer or gas-metering and pressure-control equipment existing and installed prior to September 8, 1986), a five dBA penalty should be accounted for in the noise levels (i.e., a value of +5 dBA would be added to the sound level measurement of the offending noise source).

Section 111.03 provides minimum ambient noise levels for various land uses, as described in Table 6-22. below. In the event that the actual measured ambient noise level at a subject location is lower than that provided in the table, the level in the table shall be assumed.

TABLE 6-22. CITY OF LOS ANGELES ASSUMED MINIMUM AMBIENT NOISE LEVELS

Zone	Assumed Minimum Ambient Noise (L_{eq}), dBA[a]	
	Daytime (7 a.m. – 10 p.m.)	Nighttime (10 p.m. – 7 a.m.)
A1, A2, RA, RE, RS, RD, RW1, RW2, R1, R2, R3, R4, and R5	50	40
P, PB, CR, C1, C1.5, C2, C4, C5, and CM	60	55
M1, MR1, and MR2	60	55
M2 and M3	65	65

Source: Los Angeles Municipal Code, Section 111.03.
[a] At the boundary line between two zones, the ambient noise level of the quieter zone shall be used.

As discussed previously, the LAMC is not explicit with respect to defining the length of time over which an average noise level should be assessed. However, based on the noted reference to "60 consecutive minutes" in Section 111.02 of the LAMC, the 1-hour L_{eq} metric is used as the length of time to determine an average noise level.

Section 112.01 of the Noise Ordinance addresses noise from radios, television sets, and similar devices that are used for the producing, reproducing, or amplification of the human voice, music, or any other sound. This section states that any noise level caused by these devices that is audible to the human ear at a distance in excess of 150 feet from the property line of the noise source, within any residential zone of the City or within 500 feet thereof, would be a noise violation. Additionally, these devices may not generate noise that exceeds the ambient noise level at any adjacent property by more than 5 dBA.

Section 112.02 of the Noise Ordinance addresses noise from air-conditioning, refrigeration, heating, pumping, and filtering equipment. This section states that such equipment may not generate noise that would exceed the ambient noise level at any adjacent property by more than 5 dBA.

Section 112.04 of the Noise Ordinance addresses noise from powered equipment intended for repetitive use in residential areas (e.g., lawn mower, backpack blower, lawn edger, riding tractor) and other machinery, equipment, and devices. This section states that the operation of said equipment between the hours of 10:00 p.m. and. 7:00 a.m. within any residential zone or within 500 feet of a residence is prohibited. Additionally, noise levels associated with the operation of this type of equipment may not generate noise that would exceed the ambient noise level at any adjacent property by more than 5 dBA.

Section 114.02 of the Noise Ordinance addresses noise from motor-driven vehicles. (It is noted that the requirement applies to vehicles on private property only, and does not apply to vehicles operated within public rights-of-way.) This section states that such vehicles may not generate noise that would exceed the ambient noise level at any occupied residential property by more than 5 dBA.

Section 114.03 of the Noise Ordinance addresses noise from vehicle loading and unloading. This section prohibits the loading or unloading of any vehicle, or operation of any dollies, carts, forklifts, or other wheeled equipment, between the hours of 10:00 p.m. and 7:00 a.m. of the following day that causes any impulsive sound or raucous or unnecessary noise within 200 feet of any residential building.

City of Los Angeles General Plan Noise Element (1999)

In addition to the previously described LAMC provisions, the City has also established noise guidelines in the Noise Element of the City's General Plan that are used for planning purposes. These guidelines are based, in part, on the community noise compatibility guidelines established by the California State Governor's Office of Planning and Research and are intended for use in assessing the compatibility of various land use types with a range of noise levels.[86] These are not strict standards, but rather are intended to help guide the determination of appropriate land use and mitigation measures relative to existing or anticipated ambient noise levels. The land use/noise compatibility guidelines in the City's General Plan Noise Element are shown in Table 6-23. As shown, **t**he CNEL noise levels for specific land uses are classified into four categories: (1) "normally acceptable" (2) "conditionally acceptable" (3) "normally unacceptable" and (4) "clearly unacceptable." A CNEL value of 70 dBA is considered the dividing line between a "conditionally acceptable" and "normally unacceptable" noise environment for noise sensitive land uses, including residences, transient lodgings, schools, and libraries.

[86] State of California, General Plan Guidelines, Governor's Office of Planning and Research, 2003.

TABLE 6-23. CITY OF LOS ANGELES GUIDELINES FOR NOISE COMPATIBLE LAND USE

Land Use Category	Day-Night Average Exterior Sound Level (CNEL dB)						
	50	55	60	65	70	75	80
Residential Single-Family, Duplex, Mobile Home	A	C	C	C	N	U	U
Residential Multi-Family	A	A	C	C	N	U	U
Transient Lodging, Motel, Hotel	A	A	C	C	N	U	U
School, Library, Church, Hospital, Nursing Home	A	A	C	C	N	N	U
Auditorium, Concert Hall, Amphitheater	C	C	C	C/N	U	U	U
Sports Arena, Outdoor Spectator Sports	C	C	C	C	C/U	U	U
Playground, Neighborhood Park	A	A	A	A/N	N	N/U	U
Golf Course, Riding Stable, Water Recreation, Cemetery	A	A	A	A	N	A/N	U
Office Building, Business, Commercial, Professional	A	A	A	A/C	C	C/N	N
Agriculture, Industrial, Manufacturing, Utilities	A	A	A	A	A/C	C/N	N

Source: City of Los Angeles General Plan, Noise Element, 1999.
Notes:
A = Normally acceptable. Specified land use is satisfactory, based on the assumption that the buildings involved are conventional construction, without any special noise insulation.
C = Conditionally acceptable. New construction or development only after a detailed analysis of noise mitigation is made and needed noise insulation features are included in project design. Conventional construction; closed windows and fresh air supply systems or air-conditioning normally will suffice.
N = Normally unacceptable. New construction or development generally should be discouraged. A detailed analysis of noise reduction requirements must be made and noise insulation features included in the design of a project.
U = Clearly unacceptable. New construction or development generally should not be undertaken.

Thresholds of Significance

Short-term Construction Noise Criteria

As discussed above, the City regulates construction noise levels per the requirements of the LAMC, which establishes permissible hours for construction activities under Section 41.40 and noise level limits for construction equipment under Section 112.05. As such, the construction noise levels generated by the project would be assessed against these noise regulations and standards of the LAMC to determine whether potential noise impacts would occur. It should be noted that both Sections 41.40 and 112.05 of the LAMC also identify conditions where their respective provisions would not apply. With respect to permissible hours for construction activities, Section 41.40(b) states that construction work occurring outside of the hours between 7:00 a.m. to 9:00 p.m. is allowed if written permission from the Board of Police is obtained. With respect to noise level limits for construction equipment, Section 112.05 of the LAMC also states that its noise limit "shall not apply where compliance is technically infeasible. Technical infeasibility means that the noise limit cannot be achieved despite the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques during operation of the equipment." Therefore, construction activities that either occur outside of the City's permitted construction hours and days identified in Section 41.40 of the LAMC without written permission from the Board of Police, or generate noise levels in excess of the 75 dBA 1-hour L_{eq} noise limit established under Section 112.05 of the LAMC without implementation of technically feasible noise-reduction measures or techniques, are considered to result in significant impacts. Section 112.05 of the LAMC indicates that the 75 dBA L_{eq} noise limit applies at a distance of 50 feet. However, for the purpose of conducting a conservative analysis, the noise limit is applied at the nearest sensitive receptors to the project site

even though these existing noise-sensitive receptors are located farther than 50 feet from the project site.

Long-term Operational Noise Criteria

In accordance with the noise regulations established under the LAMC, a noise level increase of 5 dBA over the existing average ambient noise level at an adjacent property line is considered a noise violation for most operational noise sources.[87] This standard applies to: (1) radios, television sets, and similar devices defined in LAMC Section 112.01; (2) air conditioning, refrigeration, heating, pumping, and filtering equipment defined in LAMC Section 112.02; (3) powered equipment intended for repetitive use in residential areas and other machinery, equipment, and devices defined in LAMC Section 112.04; and (4) motor vehicles driven on site as defined in LAMC Section 114.02. As such, based on the regulations of the LAMC, a significant operational noise impact would occur if project-related operational on-site (i.e., non-roadway) noise sources such as building mechanical/electrical equipment, parking facilities, outdoor gathering areas, and loading dock areas increase the existing ambient noise level at noise-sensitive uses by more than 5 dBA.

Traffic Noise Criteria

With respect to roadway noise, which is a continual noise source that occurs throughout the day, a 24-hour average noise level metric (i.e., dBA CNEL) is used to assess noise impacts associated with the project based on the City's land use/noise compatibility guidelines shown in Table 6-23.[88] With respect to the community noise assessment, changes in noise levels of fewer than 3 dBA are generally not discernable to most people, while changes greater than 5 dBA are readily noticeable and would be considered a significant increase. For the purpose of this analysis, a significant impact related to an increase in traffic noise levels resulting from project-induced vehicle trips during construction and operations would occur if the project causes the ambient noise level at affected sensitive land uses to increase by 3 dBA in CNEL to or within the "normally unacceptable" or "clearly unacceptable" category identified in Table 6-23, or any 5 dBA or greater noise increase if the ambient noise level at the affected sensitive land use is within the "normally acceptable" or "conditionally acceptable" category.

Existing Noise Environment

The project site is located in an urbanized area surrounded by a mix of land uses, including commercial, institutional, residential, and industrial uses situated in low-, mid-, and high-rise buildings, as well as surface parking lots. As discussed previously, the Hill Grill and Blue Moon Hookah Lounge commercial buildings and a surface parking lot are located north of the project site, across West 11th Street. To the east of the project site, across South Hill Street, is the seven-story Axis Apartments mixed-use building, beyond which is the historic five-story Herald Examiner Building. Across South Hill Street to the southeast is a 10-story Public Works office building. A one-story Bank of America building and surface parking lot borders the project site to the south, beyond which is the 12-story Eleven49 office building. To the southwest of the project

[87] City of Los Angeles. *Noise Element of the City of Los Angeles General Plan*. February 3, 1999.

[88] As discussed above, the City's land use/noise compatibility guidelines are most commonly applied to noise from mobile (transportation) noise sources, such as traffic, rail, and aircraft noise. Stationary noise sources are most commonly addressed using the municipal code standards.

site and adjacent to the Eleven49 office building is the 32-story USC Tower office building. An alley abuts the project site to the west, across from which is a surface parking lot. The Belasco and Mayan theaters are located to the northeast of the project site, across the intersection of South Hill and West 11th Streets.

Given the urbanized area where the project site is located, the existing noise environment in the project vicinity would generally be dominated by traffic noise on local streets. However, due to the current COVID-19 pandemic at the time that writing of this technical report began and the reduction in active uses, including associated changes to traffic patterns and other restrictions and changes resulting from COVID-19 related statewide, countywide, and local emergency orders, no noise measurements were conducted to document existing noise levels in the project study area as such measurements would not provide a proper representation of the project area's noise environment. Due to these circumstances, noise measurements that were taken in the project site vicinity for the 1045 Olive Project Draft EIR that was certified in February 2020 was used for the purpose of analyzing potential noise impacts for the project in this technical report.[89] The 1045 Olive Project site is located approximately 260 feet from the project site to the northwest and, like the project, also fronts 11th Street. Given the proximity of these two sites, the selected noise measurement locations at identified sensitive land uses for that project would also provide coverage of noise-sensitive land uses near the project site. The nearest sensitive receptors located within 500 feet of the project site, and the noise measurement locations where measured noise levels from the 1045 Olive Project were used for the project's noise analysis in this report are shown on Figure 6-1. The measured noise levels at the noise measurement locations shown on Figure 6-1 are summarized in Table 6-24. In summary, the noise measurement locations include:

- Noise Measurement 1 (NM1): Located along Olive Street approximately 400 feet northwest of the project site;
- Noise Measurement 2 (NM2): Located along and fronting 11th Street approximately 375 feet northwest of the project site;
- Noise Measurement 3 (NM3): Located along Margo Street approximately 430 feet west of project site; and
- Noise Measurement 4 (NM4): Located at the southeastern corner of 11th Street and S. Hill Street, approximately 80 feet east of project site.

TABLE 6-24. SUMMARY OF MEASURED AMBIENT NOISE LEVELS IN PROJECT AREA

Location	Date Measurement Conducted	Time[a]	Noise Levels (dBA)		
			Hourly L_{eq}	Average Hourly L_{eq}	CNEL
NM1[a]	1/31/2018 to 2/1/2018	Daytime[b]	63–76[c]	69	70.6
		Nighttime[b]	54–68[d]	62	

[89] City of Los Angeles. *1045 Olive Project Draft Environmental Impact Report*. ENV-2016-4630-EIR. September 2019. Available: https://planning.lacity.org/development-services/eir/1045-olive-project-0. Accessed July 1, 2020.

Location	Date Measurement Conducted	Time[a]	Noise Levels (dBA)		
			Hourly L_{eq}	Average Hourly L_{eq}	CNEL
NM2[a]	1/31/2018 to 2/1/2018	Daytime[a]	63–76[c]	69	72.0
		Nighttime[a]	54–69[d]	64	
NM3[e]	1/31/2018	9:02 a.m. to 9:17 a.m.	65.6	NA	NA
NM4[e]	4/24/2019	9:39 a.m. to 9:54 a.m.	71.8	NA	NA

Note: NA = Not applicable
[a] Long-term noise measurement that was conducted over a 24-hour period.
[b] Daytime = 7 a.m. to 10 p.m. Nighttime = 10 p.m. to 7 a.m.
[c] The value represents the range of hourly noise levels measured across the daytime period (i.e., 7 a.m. to 10 p.m.).
[d] The value represents the range of hourly noise levels measured across the nighttime period (i.e., 10 p.m. to 7 a.m.).
[e] Short-term noise measurement that was conducted over a 15-minute period.

As shown in Table 6-24, the daytime ambient noise levels in the project vicinity generally ranged between approximately 63 and 76 dBA L_{eq} in the project area. The two long-term (i.e., 24-hour) noise measurements indicate that the average hourly noise levels during daytime hours were 69 dBA L_{eq} at both the NM1 and NM2 locations, while the average hourly noise levels during nighttime hours were 62 dBA L_{eq} at the NM1 location and 64 dBA L_{eq} at the NM2 location.

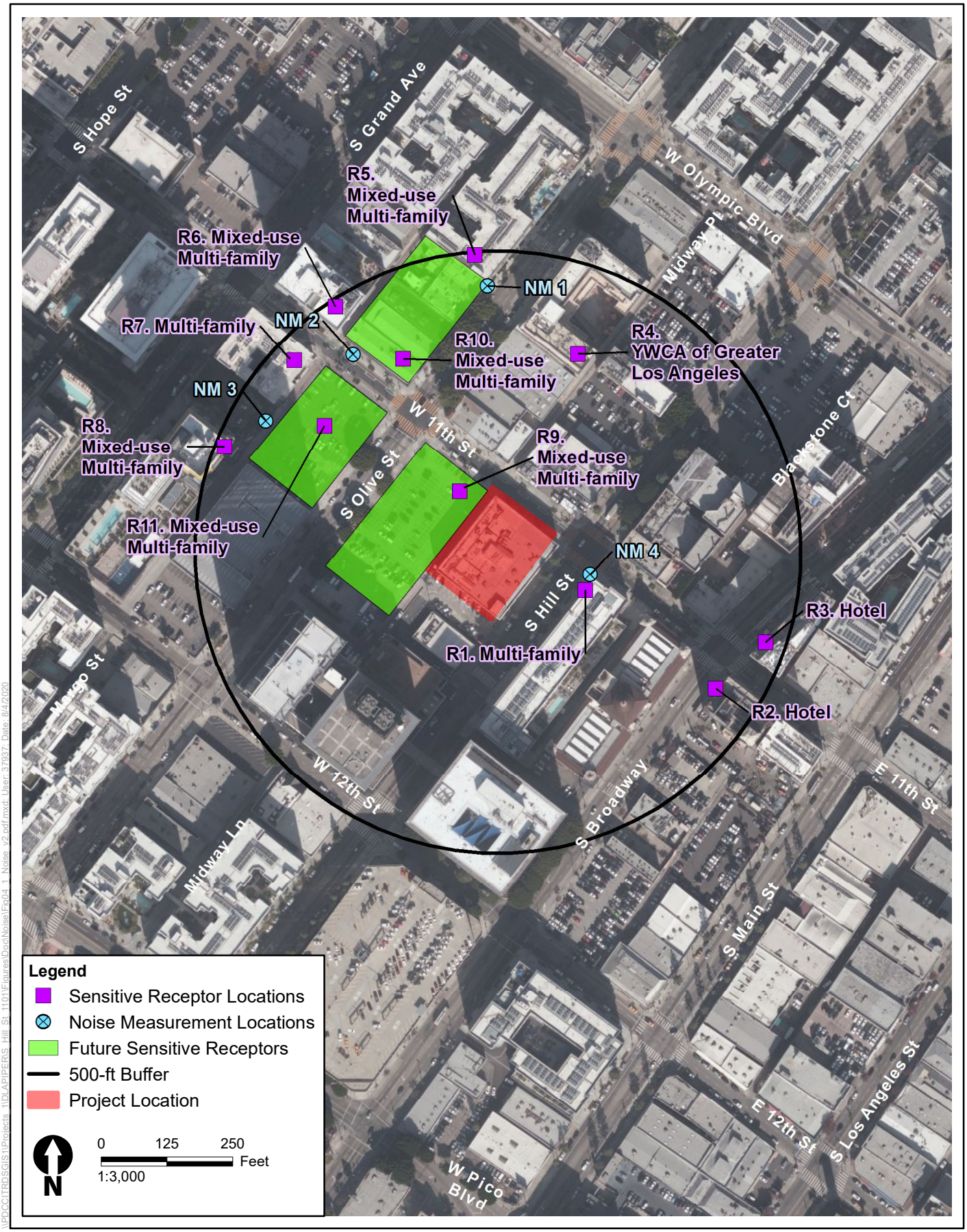

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Figure 6-1
Existing Project Area Noise Conditions and Nearby Sensitive Receptors

Project Design Features

The following project design feature (PDF) would be implemented as part of the project:

- **PDF-NOI-1**: Each mechanical room shall be outfitted with sound attenuation measures to further minimize noise levels at neighboring properties in accordance with Section 112.02 of the LAMC, which prohibits noise from mechanical equipment from exceeding the ambient noise level on the premises of other occupied properties by more than 5 dBA.

- **PDF-NOI-2:** The mechanical room at the ground-floor level of the Project building adjacent to the alleyway housing the emergency generators shall be designed with sufficient noise attenuation features (e.g., silencers, generator enclosures, insulation, etc.) to provide compliance with Section 112.02 of the LAMC, which prohibits noise from mechanical equipment from exceeding the ambient noise level on the premises of other occupied properties by more than 5 dBA.

Construction Noise

On-site Construction Activities

Construction activities associated with the project are anticipated to last approximately 36 months, with construction completion anticipated in 2025. During this time, temporary increases in noise levels in the project area would occur during certain phases of the construction period due to the operation of various large construction equipment within the project site. Construction of the project would involve demolition of the existing two-story warehouse building followed by construction of a 40-story mixed-use building with TORS units, residential, and commercial uses. Grading activities would include excavation and removal of approximately 58,000 cubic yards of soil from the project site. For any individual off-site receptor located in proximity to the project, noise levels experienced over the construction period would fluctuate depending on the type of construction activity and the location of that activity occurring within the project site. The noise levels generated by each individual piece of construction equipment associated with each of the different construction activities that would occur as part of the project are shown in Table 6-25.

TABLE 6-25. PROJECT CONSTRUCTION ACTIVITIES AND EQUIPMENT NOISE LEVELS

Activity	Equipment	Quantity[a]	Individual Equipment Noise Levels (dBA) at 50 Feet
			L_{eq}
Demolition	Excavator	2	77
Site preparation	Excavator	1	77
Grading	Excavator	1	77
	Dump Truck[b]	2	73
Building Foundation Concrete Pour[c]	Concrete Pump Truck	4	74
	Concrete Mixer Truck	8	75
Building Construction	Tower Crane[d]	1	73
	Manlifts	3	68
	Concrete Trailer Pump	1	74

Activity	Equipment	Quantity[a]	Individual Equipment Noise Levels (dBA) at 50 Feet
			L_{eq}
Paving	Asphalt Paver	1	74

Source: FHWA 2008.
[a] The quantity of each type of equipment that is anticipated to operate at the project site during each construction activity.
[b] Assumes two dump trucks would be operating on site with an excavator at any given time during the grading phase.
[c] The building foundation concrete pour phase will be conducted over approximately 20 hours over the course of 1 day.
[d] For the purpose of conducting a conservative analysis, the noise level for a mobile crane is used in the analysis. Tower cranes, which are electrically powered, generally produce lower noise levels than diesel-powered cranes.

For the purpose of this analysis, the composite hourly average noise levels for the multiple equipment items associated with each construction activity shown in Table 6-2 were first calculated at a reference distance of 50 feet as part of an intermediary step for use in estimating the noise levels at sensitive off-site receptors. The composite hourly average noise levels for each construction activity are shown in Table 6-26.

TABLE 6-26. COMPOSITE NOISE LEVELS FOR EACH CONSTRUCTION ACTIVITY

Construction Activity	Average Composite Hourly Noise Level (Leq) at 50 feet, dBA
Demolition	80
Site preparation	77
Grading	79
Building Foundation Concrete Pour	85
Building Construction	78
Paving	74

As shown in Table 6-26, the average hourly noise levels for the project's construction activities would range from 74 to 85 dBA L_{eq} at the reference distance of 50 feet. The highest noise levels would be associated with the one-day concrete pour activities.

The nearest sensitive land uses in the project site vicinity that could be exposed to increased noise levels during project construction include:[90]

- R1: The seven-story Axis Apartments building located approximately 85 feet to the east of the project site, across South Hill Street;
- R2: The Proper Hotel located approximately 395 feet to the east of the project site at 1100 South Broadway;

[90] The distances identified for each off-site sensitive receptor listed below from the project site are measured from the receptor buildings to the project site. Given the built-out and urban environment of the project area, none of the identified off-site sensitive receptor locations have outside amenity areas (e.g., lawns) adjacent to their respective buildings where people would congregate and be closer to the project site.

- R3: The Hoxton Hotel located approximately 415 feet to the east of the project site at 1060 South Broadway;
- R4: The YWCA Greater Los Angeles campus building, which includes residential units, located approximately 280 feet to the north at 1020 S Olive Street;
- R5: The seven-story mixed-use multi-family development building located approximately 425 feet to the north at 1001 S. Olive Street;
- R6: The 20-story Ten50 mixed-use multi-family development building located approximately 435 feet to the northwest at 1050 S. Grand Avenue;
- R7: The 13-story Grand Lofts building located approximately 445 feet to the northwest at 1100 S. Grand Avenue; and
- R8: The 38-story Aven Apartments building located approximately 490 feet to the west at 1120 S. Grand Avenue.

In addition to these existing nearby noise-sensitive receptors, there are two future noise-sensitive land uses in proximity to the project site that would have a direct line of sight of the project site. One project is the proposed 60-story mixed-use DTLA South Park Project (i.e., the future Mack Urban) located approximately 18 feet away and directly west of the alley adjacent to the project site at 1120 S. Olive Street.[91] The second project is the proposed 1045 S. Olive Street Project, which consists of a 70-story mixed-use building that would include up to 794 residential dwelling units located approximately 265 feet to the northwest of the project site at 1045 S. Olive Street.[92] Given that these two developments could potentially be constructed, and in operation by the time project construction commences, these two future sensitive receptors could also be exposed to noise levels generated from project related construction.[93] For the purposes of this analysis, potential construction-related noise impacts were assessed at each of these sensitive receptors. The locations of these receptors are shown on Figure 6-1.

The highest construction noise levels at each of the analyzed receptor locations were estimated based on the composite noise levels shown in Table 6-26 and the distance of each analyzed receptor from the project's construction activities. The estimated construction noise levels experienced by the nearby sensitive receptors are shown in Table 6-27. Detailed calculations are provided in the project-specific Noise Technical Report contained in Appendix H.

[91] Depicted as receptor R9 in Table 6-27 below.

[92] Depicted as receptor R10 in Table 6-27 below.

[93] An additional future nearby sensitive receptor would be the proposed mixed-use development located approximately 255 feet to the northwest at 1105 S. Olive Street (at the southwest corner of W. 11th Street and S. Olive Street). However, this receptor site would be located farther to the west of the project site and would be behind the 60-story DTLA South Park Project that is located directly west (across the alley) from the project site. Thus, the project's potential noise impacts during construction are analyzed at the closer DTLA South Park Project and at the proposed mixed-use 1045 Olive Street Project as these two future projects would have a direct line-of-sight of the project site and would be exposed to higher noise levels from the proposed project.

TABLE 6-27. ESTIMATED CONSTRUCTION NOISE LEVELS AT NEARBY SENSITIVE RECEPTORS – UNMITIGATED

Receptor	Description/Location	Project Construction Phase	Estimated Average Hourly Noise Level (dBA L_{eq})[a,b]	Highest Estimated Average Hourly Noise Level (dBA L_{eq})	Exceed Applicable Noise Standard?
R1	Seven-story Axis Apartments building directly east of project site, across South Hill Street	Demolition	71	76	**Yes**
		Site preparation	68		
		Grading	70		
		Building Foundation Concrete Pour	76		
		Building Construction	69		
		Paving	66		
R2	Proper Hotel located approximately 395 feet to the east of the project site at 1100 South Broadway	Demolition	56	61[c]	No
		Site preparation	53		
		Grading	55		
		Building Foundation Concrete Pour	61		
		Building Construction	54		
		Paving	50		
R3	Hoxton Hotel located approximately 415 feet to the east of the project site at 1060 South Broadway	Demolition	60	65	No
		Site preparation	57		
		Grading	59		
		Building Foundation Concrete Pour	65		
		Building Construction	58		
		Paving	54		

Receptor	Description/Location	Project Construction Phase	Estimated Average Hourly Noise Level (dBA L_{eq})[a,b]	Highest Estimated Average Hourly Noise Level (dBA L_{eq})	Exceed Applicable Noise Standard?
R4	YWCA Greater Los Angeles campus building approximately 280 feet north of project site at 1020 S Olive Street	Demolition	58	63[c]	No
		Site preparation	55		
		Grading	57		
		Building Foundation Concrete Pour	63		
		Building Construction	56		
		Paving	52		
R5	Seven-story mixed-use multi-family development building approximately 425 feet to the north of project site at 1001 S. Olive Street	Demolition	54	59[c]	No
		Site preparation	51		
		Grading	53		
		Building Foundation Concrete Pour	59		
		Building Construction	52		
		Paving	49		
R6	20-story Ten50 mixed-use multi-family development building approximately 435 feet northwest of project site at 1050 S. Grand Avenue	Demolition	60	65	No
		Site preparation	57		
		Grading	59		
		Building Foundation Concrete Pour	65		
		Building Construction	58		
		Paving	54		
R7	13-story Grand Lofts building approximately 445 feet northwest of project site at 1100 S. Grand Avenue	Demolition	60	65	No
		Site preparation	57		
		Grading	59		
		Building Foundation Concrete Pour	65		

Receptor	Description/Location	Project Construction Phase	Estimated Average Hourly Noise Level (dBA L_{eq})[a,b]	Highest Estimated Average Hourly Noise Level (dBA L_{eq})	Exceed Applicable Noise Standard?
		Building Construction	58		
		Paving	54		
R8	38-story Aven Apartments building approximately 490 feet west of project site at 1120 S. Grand Avenue	Demolition	59	64	No
		Site preparation	56		
		Grading	58		
		Building Foundation Concrete Pour	64		
		Building Construction	57		
		Paving	53		
R9	Future mixed-use DTLA South Park Project located approximately 18 feet away and west of the alley adjacent to the project site at 1120 S. Olive Street	Demolition	69	74	No
		Site preparation	66		
		Grading	68		
		Building Foundation Concrete Pour	74		
		Building Construction	67		
		Paving	63		
R10	Future mixed-use residential and commercial project located approximately 265 feet northwest of the project site at 1045 S. Olive Street	Demolition	53	58	No
		Site preparation	50		
		Grading	52		
		Building Foundation Concrete Pour	58		
		Building Construction	51		
		Paving	42		

[a] The noise levels are estimated using a source-to-receptor distance that represents the acoustical average distance between the construction area and each receptor location.
[b] The highest estimated average hourly noise levels at each of the off-site noise-sensitive receptors are those resulting from the project's one-day concrete pour activities, which generates the highest noise levels when compared to the other construction activities.
[c] The estimated construction noise level at this location takes into account an additional 5 dBA reduction in noise levels due to the presence of intervening building structures that obstruct the line of sight between the receptor and the project site.

As shown in Table 6-27, the highest estimated construction-related noise levels that could result at nearby sensitive receptors over the course of project's construction period would range from 58 dBA L_{eq} at sensitive receptor R10 to 76 dBA L_{eq} at sensitive receptor R1. With the exception of sensitive receptor R1, all of the other analyzed sensitive receptors in proximity to the project site would not be exposed to construction noise levels exceeding 75 dBA L_{eq}. The exceedance of the 75 dBA L_{eq} at sensitive receptor R1 occurs during the building foundation concrete pour phase, which would only occur over the course of one day. The noise levels generated from all of the project's remaining construction phases would not exceed 75 dBA L_{eq} at sensitive receptor R1. Thus, aside from the one-day concrete pour, noise levels over the duration of the project's construction schedule would not exceed the applicable noise standard at any of the analyzed sensitive receptors. Additionally, it should be noted that with the exception of the one-day concrete pour, the noise levels shown in Table 6-27 for the other activities are considered to be a conservative estimate as they account for the concurrent operation of all construction equipment for the highest noise-generating construction activity. Throughout the course of a construction day, it would be seldom if ever that all construction equipment would be run simultaneously. Instead, the operation of each piece of construction equipment at the project site is expected to be staggered throughout the construction day and each piece would be turned off when not in use. Furthermore, during the quieter phases of construction or when construction activity moves farther away from a receptor, the noise levels would decrease. As such, the highest construction noise levels experienced at each off-site sensitive receptor would only occur over a temporary period within the project's overall construction schedule.

As discussed above and shown in Table 6-27, the construction noise levels at sensitive receptor R1 during the one-day concrete pour would exceed 75 dBA L_{eq} by 1 dBA. To ensure that construction noise levels would be minimized on surrounding properties, the proposed project would implement Mitigation Measure NOI-1 to reduce construction noise levels at nearby receptors by requiring the implementation of various noise-minimizing measures during the entire duration of the project's construction activities, including the erection of an 8-foot-high temporary barrier around the project site. With the implementation of technically feasible measures in accordance with Section 112.05 of the LAMC under Mitigation Measure NOI-1 to reduce noise levels at nearby sensitive receptors, the project's construction noise impacts would be reduced to a less-than-significant level.

Furthermore, because the one-day concrete pour would be conducted over approximately 20 hours, the construction activities during that day would occur outside of the City's standard construction hours (i.e., between 7:00 a.m. to 9:00 p.m.). As such, the project would implement Mitigation Measure NOI-2, which would require the obtainment of a Board of Police Commissioners Permit to allow for the project's one-day continuous concrete pour to occur outside of the hours between 7:00 a.m. to 9:00 p.m. With the obtainment of this permit, the project's concrete pour activities would comply with the provisions of Section 41.40 of the LAMC and impacts associated with violation of the permissible construction hour provisions of the LAMC would be less than significant.

Mitigation Measures

MM NOI-1: The following measures shall be employed during project construction to reduce short-term noise levels at nearby noise-sensitive residential receptors:

a) An 8-foot-high temporary barrier with a minimum sound transmission (STC) rating of 26, shall be erected along eastern and southern side of the project site boundary. The barrier will start at the northern extent of the construction site at the intersection of 11th Street and S. Hill Street and shall continue to the southern terminus of the construction site where it will turn perpendicular to the construction site and continue until the western terminus of the project site at the alley way west of the project site. This barrier shall be constructed in one of the following ways:

- From acoustical blankets hung over or from a supporting frame. The blankets shall be firmly secured to the framework. The blankets shall be overlapped by at least 4 inches at seams and taped and/or closed with hook-and-loop fasteners (i.e., Velcro®) so that no gaps exist. The largest blankets available shall be used in order to minimize the number of seams. The blankets shall be draped to the ground to eliminate any gaps at the base of the barrier.

- From commercially available acoustical panels lined with sound-absorbing material (the sound-absorptive faces of the panels should face the construction equipment).

- From common construction materials such as plywood provided that the barrier is designed with overlapping material at the seams to assure that no gaps exist between the panels.

b) On-site vehicle speeds shall be limited to 15 miles per hour or less (except in cases of emergency).

c) Construction-related truck traffic shall be routed away from noise-sensitive areas to the extent feasible.

d) All construction equipment shall be properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded.

e) Pneumatic tools used at the site shall be equipped with an exhaust muffler on the compressed air exhaust to minimize noise levels.

f) Stationary noise sources shall be located as far from adjacent sensitive receptors as possible and shall be muffled and enclosed within temporary sheds or insulated barriers.

g) Back-up beepers for all construction equipment and vehicles shall be broadband sound alarms or adjusted to the lowest noise levels possible, provided that Occupational Safety and Health Administration (OSHA) and California OSHA safety requirements

are not violated. On vehicles where back-up beepers are not available, alternative safety measures such as escorts and spotters will be employed.

h) A designated website shall be set up during project construction that provides the public with information about the project and its construction schedule as well as opportunities for the public to submit questions on the project.

i) Prior to commencement of construction a designated project contact person shall directly notify the management of any surrounding residential properties located within 100 feet of the project site about the construction schedule and activities and provide a contact number to address any noise-related complaints during construction.

j) The construction management company's name and telephone number(s) shall be posted at a least one location along each street frontage that borders the project site.

k) A designated point of contact shall be identified to address noise-related complaints during construction. The noise disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., starting too early, bad muffler) and will be required to implement reasonable measures such that the complaint is resolved.

MM NOI-2: A Board of Police Commissioners Permit in accordance with the provisions in LAMC Section 41.40 shall be obtained by the project construction contractor to allow for a continuous concrete pour at the project site during hours outside of the period between 7:00 a.m. and 9:00 p.m.

Construction Traffic

Construction worker vehicles and haul trucks, which would transport equipment and materials to and from the project site, would incrementally increase noise levels on the local roads in the project area. The trucks traveling to and from the project site would be required to travel along the haul route approved by the City of Los Angeles for the project. The proposed haul route for the project will require trucks to access the project site from the nearby Interstate (I-) 10, taking the Los Angeles Street exit from the westbound I-10 and the Los Angeles Street entrance onto the eastbound I-10. Trucks will drive along Hill Street to travel between the freeway and the project site. Interstate 10 is located approximately 0.5 mile south of the project site. The construction worker vehicles would not be restricted to travel exclusively on this City-approved haul route, and instead are allowed to access the project site via other routes. However, for the purpose of conducting a conservative traffic noise analysis, all construction traffic for the project (i.e., worker and truck trips) is assumed to travel on this approved haul route.

Based on construction-related information provided by the Applicant, it was determined that the one-day building foundation concrete pour phase for the project would require the heaviest truck trips per day, followed by the grading construction phase. These two phases would contribute most to increased roadway noise levels in the project area. During the concrete pour phase, an estimated 1,152 daily concrete truck trips (576 inbound and 576 outbound) and 10 daily worker trips (5 inbound and 5 outbound) would occur. During the grading phase, an estimated 252 daily haul truck trips (126 inbound and 126 outbound) and 60 daily worker trips (30 inbound and 30 outbound)

would occur. To assess the potential traffic noise increase resulting from project construction, the additional daily traffic volumes generated from project construction (i.e., 1,152 concrete truck trips and 10 worker trips during the concrete pour phase and 252 haul truck trips and 60 worker trips during the grading phase) were added to the existing daily traffic volumes on the segments of South Hill Street in the project vicinity to assess the increase in noise levels. The estimated roadway noise levels resulting from the addition of the project's construction-related traffic on these roadway segments are shown in Table 6-28.

TABLE 6-28. OFF-SITE CONSTRUCTION TRAFFIC NOISE LEVELS

Roadway	Roadway Segment	Existing Traffic Volume Noise Levels (dBA CNEL)[a]	Existing + Project Construction Traffic Volume Noise Levels (dBA CNEL)[a]	Increase (dBA CNEL)
Building Foundation Concrete Pour Phase[b]				
South Hill Street	South of 11th Street [c]	63.9	67.1	3.2
	North of 12th Street [c]	63.6	67.0	3.4
	South of 12th Street	63.7	67.0	3.3
Grading Phase				
South Hill Street	South of 11th Street [c]	63.9	64.9	1.0
	North of 12th Street [c]	63.6	64.7	1.1
	South of 12th Street	63.7	64.7	1.0

Source: Existing Traffic Information Source: Fehr & Peers 2020.
[a] Noise levels are estimated at 50 feet from the roadway centerline.
[b] The proposed project's building foundation concrete pour phase would only occur over the course of 1 day.
[c] The stretch of roadway, South Hill Street north of 12th Street and south of 11th Street is the same geographic area. However within this geographic extent, traffic will ingress or egress to parking structures and alleyways which explains the difference in traffic noise levels.

As shown in Table 6-29, the increase in traffic noise levels on Hill Street that could potentially be used as the project's haul route would be below the applicable criterion of 5 dBA CNEL increase during both the concrete pour and grading phases. As such, the project's effect on daily average ambient noise levels related to construction traffic would be slightly perceptible during the one-day concrete pour phase and would be barely noticeable during the grading phase. Overall, impacts would be less than significant.

Operational Noise

Operational Traffic Noise

The project would generate new vehicle trips that would incrementally add to traffic levels on surrounding streets and could change the associated traffic noise levels. Based on the project's TA, it is estimated that the project would generate 150 trips in the AM peak hour trips and 181 trips in the PM peak hour trips.[94] As discussed previously, while the TA does not directly analyze ADT on the roadway segments in the project site vicinity, the ADT volumes on these nearby roadway

[94] Fehr & Peers. *1111 S. Hill Street Transportation Assessment, Draft*. August 2020 and Fehr & Peers Memorandum: Subject: 1111 S Hill Street Revised Project Analysis, July 2021.

segments were estimated, based on guidance from Fehr & Peers, by assuming that the peak PM traffic volumes at the study intersections reported in the TA represented 10 percent of the ADT.[95]

Table 6-29 summarizes the predicted existing and future noise levels, both with and without the project, from the roadway segments considered in the TA. The results indicate that future traffic noise levels with the project along the studied roadway segments would be 1.3 to 4.1 dBA higher than existing baseline conditions.[96] Project-generated traffic results indicate that the project would contribute no more than a 0.4 and 0.2 dBA increase over the existing baseline and future no project conditions, respectively. With respect to the community noise assessment, changes in noise levels of less than 3 dBA are generally not discernable to most people. As such, the small level of traffic noise increase resulting from the project is considered imperceptible to the human ear. Therefore, impacts associated with traffic noise levels from implementation of the project would be less than significant.

[95] Personal communication with John Muggridge of Fehr & Peers on March 19, 2020.

[96] It should be noted that increases in traffic noise between the future year and baseline (existing) conditions represent traffic from cumulative projects, general growth, and the proposed project. The existing plus project minus baseline and future with project minus future without project (Table 6-29) represent the projects contribution.

TABLE 6-29. PREDICTED TRAFFIC NOISE LEVELS

Roadway/Segment	Estimated Traffic Noise Levels at 50 feet from Roadway Centerline (dBA CNEL)						
	Existing (Baseline)	Existing with Project	Increase over Existing (Project Only)[a]	Future without Project	Future with Project	Increase over Existing (Cumulative)[a]	Increase over Future without Project[a]
11th Street							
West of Olive Street	58.3	58.5	0.1	60.8	60.8	2.5	0.1
East of Olive Street	57.7	58.0	0.3	60.0	60.2	2.5	0.2
West of South Hill Street	57.8	58.1	0.4	60.0	60.2	2.4	0.2
East of South Hill Street	57.7	58.0	0.3	59.9	60.1	2.4	0.2
12th Street							
West of Olive Street	55.2	55.5	0.2	59.3	59.3	4.1	0.1
East of Olive Street	54.6	55.0	0.3	56.6	56.8	2.2	0.2
West of South Hill Street	55.2	55.5	0.3	56.9	57.1	1.9	0.2
East of South Hill Street	55.9	56.0	0.2	57.3	57.4	1.6	0.1
Olive Street							
North of 11th Street	62.9	63.0	0.1	64.7	64.8	1.8	0.1
South of 11th Street	63.2	63.2	0.0	65.1	65.1	1.9	0.0
North of 12th Street	62.9	63.0	0.0	65.5	65.5	2.6	0.0
South of 12th Street	62.8	62.8	0.0	64.8	64.8	2.0	0.0
South Hill Street							
North of 11th Street	64.0	64.1	0.1	65.4	65.5	1.5	0.1
South of 11th Street	63.9	64.1	0.1	65.2	65.3	1.4	0.1
North of 12th Street	63.6	63.9	0.3	65.0	65.2	1.6	0.2
South of 12th Street	63.7	63.9	0.2	64.9	65.0	1.3	0.1

[a] Values representing noise increases may not add up exactly due to rounding.

Stationary Noise Sources

Once operational, the project would introduce stationary onsite noise sources at the project site. These would include the onsite parking structure, mechanical equipment (i.e., dry coolers and emergency generators), loading/unloading activities, and activities at the outdoor amenity areas (i.e., landscaped pool amenity deck on Level five; balconies on Level 39; and landscaped amenity roof deck on Level 40).

Parking Noise

The project would include a parking structure consisting of one subterranean levels and three levels of aboveground parking that provides up to 436 parking spaces (325 residential and 111 TORS parking spaces). The parking in the subterranean level would be fully enclosed and the aboveground parking levels would be screened from public view on the north and east side of the building while the south and west sides would be partially enclosed. Vehicular access to the parking structure would be provided at two ingress-egress points: one from the existing alley west of the building and one from South Hill Street. Activities at the parking structure would generate sporadic noise from vehicles starting, car doors slamming, car alarms, people talking, etc. The nearest existing noise-sensitive use to the project's parking structure is the Axis Apartments building located directly to the east, across South Hill Street, followed by the YWCA Greater Los Angeles campus building at 1020 South Olive Street located to the north of the project site. Aside from these nearest existing sensitive receptors, the future mixed-use DTLA South Park Project would also be located directly west of the alley adjacent to the project site and across from two of the ingress/egress points for the project's parking structure.

Based on the peak hour traffic volumes presented in the project's TA, vehicles traveling into and out of the project site would result in approximately 85 AM peak hour and 106 PM peak hour trips at the project's driveway on South Hill Street, and approximately 69 AM peak hour and 80 peak hour trips at the intersection of the alley and 11th Street. It is assumed that all peak hour vehicle trips at the alley and 11th Street driveway would be accessing the project's parking structure entrances off of the alley. For the purposes of this analysis, the PM peak-hour traffic volumes were used to estimate noise levels generated at the parking structure, as they are higher than the traffic volumes for the AM peak hour. Based on the PM peak hour traffic volumes at the parking structure entrances and the distance to the nearest off-site sensitive receptors, it was determined, using FTA's recommended methodology for stationary source general assessment, that the project's highest peak-hour vehicle trips would generate noise levels of approximately 42 dBA L_{eq} at the Axis Apartments building located directly to the east, 31 dBA L_{eq} at the YWCA Greater Los Angeles campus building located to the north, and 33 dBA L_{eq} at the nearest residential floor of the DTLA South Park development located to the west of the project site. As shown in Table 6-24, the existing daytime hourly noise level measured at the NM4 location where the Axis Apartments building is located is approximately 72 dBA L_{eq}, while the existing hourly average daytime noise level measured at the NM1 location that is in proximity to the YWCA building is 69 dBA L_{eq}. Additionally, the average hourly noise levels during nighttime hours were measured at 62 dBA L_{eq} at the NM1 location and 64 dBA L_{eq} at the NM2 location, which are representative of the noise

environment in the immediate project area.[97] Thus, because the noise levels generated from the project's parking structure at the nearest off-site sensitive receptors are well below the existing ambient daytime and nighttime noise levels at these receptors, the noise levels generated by the project's parking-related activities would not result in any substantial increase in long-term noise levels at these off-site receptors. As these nearest receptors would not be exposed to a substantial increase in long-term noise levels from the project's parking structure, the noise levels experienced at receptors that are farther from the project site would also not be substantial. While other parking-related noise sources such as tire squeal and car alarms could also be generated within the project's parking structure, these noise sources only happen occasionally and the noise levels generated would not be of a magnitude that would present a nuisance unless sensitive land uses are located immediately adjacent to the parking structure. Although the future DTLA South Park Project building would be located adjacent to the alley to the west of the project site, the future residential uses at that building are set back approximately 72 feet from the edge of the alley and would be located on floors 7 to 60 of the building above six levels of podium parking above the ground floor. With the six-story parking structure located along the entire edge of the alley, this structure would also serve as a noise barrier for the future residential units from noise generated by the project's parking structure. Therefore, this impact would be less than significant.

Mechanical Equipment

As part of the project, noise-generating mechanical equipment at the project site would include numerous HVAC equipment located in mechanical rooms throughout the building, rooftop dry coolers, and emergency generators. As discussed previously, all mechanical rooms within the project building would be outfitted with sound attenuation measures to reduce noise levels at neighboring properties in accordance with Section 112.02 of the LAMC as part of PDF-NOI-1. The other operational equipment that may be audible at nearby sensitive receptors would be the four dry coolers (located on the roof top) and two emergency generators (located on the ground floor mechanical room).

Noise from the rooftop dry coolers would be generated when the equipment is in operation throughout the day. However, because the rooftop level where the dry coolers would be located is beyond 40-stories in height (approximately 451 feet from the ground level), the dry coolers would be situated much higher than the existing nearest sensitive receptor building, which is the seven-story Axis Apartments building located directly to the east of the project site

This vertical distance would attenuate noise levels generated by the dry coolers. Based on the manufacturer's specification sheet for the dry coolers, noise levels generated by a single dry cooler would be approximately 50 dBA at 50 feet. Given this reference noise level, the simultaneous operation of all four dry coolers on the rooftop would generate a composite noise level of approximately 56 dBA at 50 feet. Given this composite noise level and the distance from the approximate center of the project building's rooftop to the seven-story Axis Apartments building,

[97] While existing nighttime ambient noise levels were only measured at the NM1 and NM2, the measured noise levels at these two locations would still be representative of nighttime noise conditions in the Project study area as the identified offsite sensitive receptor locations to the Project also front the same roadways where the measurements were taken.

the resulting noise level at this nearest receptor was estimated to be approximately 38 dBA L_{eq}. At the next nearest existing sensitive receptor, which is the seven-story YWCA of Greater Los Angeles campus building, the noise levels from the project's rooftop dry coolers would be approximately 36 dBA L_{eq}. Both the 38 dBA L_{eq} and 36 dBA L_{eq} noise levels that would result at the nearest sensitive receptors would be well below both the daytime and nighttime ambient noise levels in the project area and for the receptors (refer to Table 6-29). The future DTLA South Park development would include residential units on levels 7-60 of the building. As such, some of the residential uses located at the highest floors would have a direct line of sight to the project's dry coolers, with the nearest residences located approximately 186 feet (straight line distance) from the noise source. Noise levels from the project's rooftop dry coolers would be approximately 45 dBA L_{eq} at these nearest residences. Noise levels of this magnitude would not exceed the calculated existing daytime or nighttime ambient noise levels of 57 and 52 dBA L_{eq} at this receptor height and therefore would not be obtrusive at the exterior uses located in the DTLA South Park tower. It should also be noted that this noise level estimate is conservative as it does not account for any noise attenuation that may be provided by any screening or parapets at the rooftop. As an industry practice, the design of such mechanical equipment would often be provided with shielding that would further reduce its noise levels. Overall, the operation of the project's rooftop dry coolers would comply with Section 112.02 of the LAMC, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than 5 dBA, and would not generate substantial noise level increases at nearby off-site sensitive uses. As the two nearest existing receptors would not be exposed to a substantial increase in long-term noise levels from the project's rooftop dry coolers, nor would the closest future development, the noise levels experienced at other receptors farther from the project site would also not be substantial. As such, this impact would be less than significant.

The two emergency generators located on the ground-floor of the project building would be operated periodically for testing and maintenance purposes as well as during times of electrical power failure at the project site. As required under PDF-NOI-2, the mechanical room housing the emergency generators would be designed with sufficient noise attenuation features required to comply with Section 112.02 of the LAMC. These noise attenuation features, which would be selected when the specific generator equipment and design of the mechanical room are finalized, may include use of silencers, generator enclosures, additional room insulation, etc. For the purpose of conducting a quantitative analysis in this report, it is assumed that generator enclosures will be used in the mechanical room to attenuate the noise levels from the two generators. Based on the manufacturer's specification sheet for a generator enclosure, the generator's attenuated noise levels from the enclosure would be approximately 75 dBA at a distance of 23 feet. Under conditions where the two generators are operated concurrently, the resulting noise level would be 78 dBA at 23 feet. While the nearest existing sensitive receptor to the project's emergency generator room based on distance would be the Axis Apartments Building located to the east of the project, across South Hill Street, the emergency generator room is located on the westernmost side of the project building and thus the project building itself, in addition to the mechanical room and other adjacent intervening rooms (i.e., lobby and restaurant), would serve to adequately attenuate the noise levels resulting from operation of the generators to a level that would likely be inaudible at this receptor. The nearest existing receptors that would have a direct line-of-sight of the project's emergency generator room would be the YWCA of Greater Los Angeles campus building to the north and the

Grand Lofts building at 1100 S. Grand Avenue to the west that are located approximately 340 feet and 445 feet, respectively, from the project's emergency generator room. Based on these distances, and taking into consideration that the mechanical room housing the generators would generally provide a minimum additional noise attenuation of 10 dBA, the resulting noise levels at these receptors would be approximately 45 dBA L_{eq} at the YWCA of Greater Los Angeles campus building and 42 dBA L_{eq} at the Grand Lofts building when the two generators are operating simultaneously. This noise level would be well below both the daytime and nighttime ambient noise levels in the project area and for these receptors (refer to Table 6-29). As discussed above, the future DTLA South Park Project would be located across the alley to the west of the project site. However, the residential uses at this future development would be located on levels 7–60 of the building and these residential floors would be set back from the building's perimeter at the alley. The nearest residential units at this receptor would be located approximately 127 feet from the location of the emergency generators. Based on the distance from the generators to the receiver, and a liberal estimate of 10 dB attenuation from the building shell, noise levels associated with the operation of the emergency generators would be approximately 53 dBA L_{eq}. As discussed above, NM2 would be representative of the immediate project area. The daytime noise level on the low end was 63 dBA L_{eq}, which would be well above the noise level produced by emergency generators. Nighttime noise levels could be as low as 54 dBA L_{eq} based on measurements at NM2. Therefore, if it were necessary to run generators at night, noise levels would be similar with respect to their intensity but would not dominate the noise environment. It should be further noted that noise levels from these emergency generators would not occur on a frequent basis or for prolonged periods of time at the project site, as their operation would mainly occur during electrical power outages that are often short-lived. Additionally, their operation for the purposes of testing and maintenance would also only occur for a limited duration over the course of a day and would generally would not take place during the more noise-sensitive nighttime hours. Thus, the operation of the project's emergency generators would not generate substantial noise level increases at nearby off-site sensitive uses. This impact would be less than significant.

Loading Area

A loading area serving the project's TORS units, and restaurant uses would be located on the ground level on the western side of the building that is adjacent to the alley. The ingress/egress point for delivery vehicles accessing this loading area would be from the alley. Noise-generating activities at this loading area would include truck movements and idling along with general loading/unloading operations. Based on previously measured noise level data collected at a loading dock serving a retail warehouse, noise levels generated by loading/unloading activities were measured at approximately 62 dBA L_{eq} at a distance of 66 feet. The nearest existing off-site sensitive receptors that would be exposed to noise levels generated by the project's loading area would be the YWCA of Greater Los Angeles campus building to the north and the Grand Lofts building to the west of the project site, which would be located approximately 354 feet and 445 feet

from the project loading area, respectively.[98] Given these distances, the resulting noise levels at these off-site sensitive receptors would be approximately 37 and 45 dBA L_{eq}. The future residential uses at the DTLA South Park Project, which would be located as close as 127 feet from the project's loading area, would be exposed to noise levels of approximately 46 dBA L_{eq}. These noise levels would not exceed either the daytime or nighttime ambient noise levels measured in the project area and for these receptors (refer to Table 6-29). As such, the noise levels generated at the loading area serving the project would not result in any substantial increase in long-term noise levels at the nearest existing and future off-site receptors or at other sensitive receptors that are located farther from the project site. Therefore, this impact would be less than significant.

Outdoor Amenity Areas

The project would include outdoor residential amenity spaces at Levels five, 39, and 40 of the building. The pool amenity deck would be on Level five and would include pool deck and spa area, flexible lawn area, and lounge decks. While Level 39 would primarily consist of enclosed amenity rooms, outdoor spaces on that level would be provided by balconies on each side of the floor. Level 40 would feature an outdoor planting area and an associated outdoor deck as well as roof terraces. The closest existing noise-sensitive use to the project would be the seven-story Axis Apartments building located directly to the east, across South Hill Street, while the closest future noise-sensitive use to the project would be the 60-story mixed-use DTLA South Park Project located west of the project site across the alley. As such, the noise levels generated at the project's outdoor amenity areas would be most perceptible at these two nearest off-site receptors.

The outdoor amenity areas would be shared amongst the project's residents and TORS guests. Noise levels generated at these outdoor amenity areas would primarily consist of conversational speech between people. To conduct a conservative analysis for the nearest off-site receptor to the project site, it is assumed that the various outdoor amenity areas on Levels five, 39, and 40 would all be used concurrently by tenants and guests at full capacity. For this analysis scenario, the following assumptions regarding the number of people at each outdoor amenity area level and their voice levels at each floor was used:

- Level five Pool Amenity Deck – 374 people (half male/half female), with 50 percent of the people talking at a "raised" voice level at any given moment[99]

- Level 39 Balcony Areas – 41 people (half male/half female), with 50 percent of the people talking at a "raised" voice level at any given moment[100]

[98] Although the nearest existing off-site sensitive receptor based on distance would be the Axis Apartments Building located to the east of the Project, across South Hill Street, the loading area is located on the westernmost side of the Project building and thus the Project building itself along with other occupied spaces on the ground-floor level (e.g., residential lobby), would serve to adequately attenuate the noise levels resulting from operation of the loading area to a level that would likely be inaudible at this receptor.

[99] The occupant design capacity for the outdoor amenity areas on Level five is 374 people.

[100] The occupant design capacity for the balconies on Level 39 is 41 people.

- Level 40 Tower Amenity Area – 458 people (half male/half female), with 50 percent of the people talking at a "raised" voice level at any given moment[101]

Based on the acoustical average distance from the nearest off-site sensitive receptor to each of the outdoor amenity areas listed above and published data for human speech noise levels, the resulting noise levels at the receptor were estimated. In addition, the amenity areas on Level five would also be equipped with an outdoor speaker system. As discussed previously, the purpose of the speaker system is to provide ambient background music only and would not be played at volumes that would dominate the noise environment where casual conversing amongst residents and guests would be difficult. The individual and combined noise levels generated by the project's outdoor amenity areas at the two nearest existing off-site sensitive receptors, which are the Axis Apartments building to the east and the YWCA of Greater Los Angeles campus building to the north of the project site, as well as the nearest future off-site sensitive receptors at the DTLA South Park Project are shown in Table 6-30.

As shown in Table 6-30, the combined noise levels generated by the project's outdoor amenity areas would not exceed the existing daytime or nighttime ambient noise level at these nearest off-site sensitive receptors to the project site by 5 dBA or more. As such, the project's outdoor amenity noise levels at all other off-site sensitive receptor locations that are located farther away would also be lower than those shown in Table 6-30. As such, this impact would be less than significant. Furthermore, it should be noted that the Level five outdoor amenity area would be installed with either a landscape or water barrier along the westerly, easterly, and southerly facades of the level as part of the project's design, which would increase the distance between the outdoor gathering areas from nearby off-site receptors that in turn would also help to further minimize noise levels at off-site receptors.

[101] The design occupant capacity for the outdoor amenity area on Level 40 is 458 people.

TABLE 6-30. ESTIMATED NOISE LEVELS FROM PROJECT OUTDOOR AMENITY AREAS AT NEAREST SENSITIVE RECEPTOR LOCATIONS

Noise Source	Estimated Noise Level at Sensitive Receptor (dBA L_{eq})		Existing Average Hourly Daytime (7 a.m. to 10 p.m.) Ambient Noise Level (dBA L_{eq})	Existing Daytime Ambient + Project (dBA L_{eq})	Exceed Ambient Noise Level by 5 dBA?	Existing Average Hourly Nighttime (10 p.m. to 7 a.m.) Ambient Noise Level (dBA L_{eq})	Existing Nighttime Ambient + Project (dBA L_{eq})	Exceed Ambient Noise Level by 5 dBA?
	Individual Sources	Combined Sources						
Axis Apartments Building								
Level five Pool Amenity Deck	57[a]	57	64[b]	65	No	59[b]	61	No
Level 39 Balcony Areas	36							
Level 40 Tower Amenity Area	46							
YWCA of Greater Los Angles Campus Building								
Level five Pool Amenity Deck	49[a]	50	66[c]	66	No	59[c]	59	No
Level 39 Balcony Areas	33							
Level 40 Tower Amenity Area	44							
DTLA South Park Project Building – 7th Level[d]								
Level five Pool Amenity Deck	56[a]	57	63[e]	64	No	58[e]	61	No
Level 39 Balcony Areas	36							
Level 40 Tower Amenity Area	46							
DTLA South Park Project Building – 40th Level[f]								
Level five Pool Amenity Deck	48	54	57[g]	59	**No**	52[g]	56	**No**
Level 39 Balcony Areas	42							
Level 40 Tower Amenity Area	53							

[a] Noise level accounts for operation of the outdoor speaker system.

[b] For the purpose of this analysis, which analyzes noise sources from the project that occur during both daytime and nighttime hours, the existing average hourly daytime and nighttime ambient noise levels measured at NM2 (refer to Figure 6-1) are used to represent the existing ambient noise levels at the Axis Apartment building, as the short-term (i.e., 15 minute) measurement at this receptor (i.e., NM4) was only conducted during the daytime. Additionally, the use of the average hourly daytime noise level from NM2 (69 dBA L_{eq}) would also provide a more conservative analysis than the short-term daytime noise level measured by NM4 (72 dBA L_{eq}). As the existing daytime and nighttime levels measured at NM2 were conducted at the street level, these noise levels have been adjusted for the Axis Apartment building to take into account distance attenuation at the seventh floor of this building where receptors would be closest to the project's outdoor amenity areas.

[c] The existing average hourly daytime and nighttime ambient noise levels measured at NM1 (refer to Figure 6-1) are used to represent the existing ambient noise levels at the YWCA of Greater Los Angeles campus building. As the existing daytime and nighttime levels measured at NM1 were conducted at the street level, these noise levels have been adjusted for the YWCA of Greater Los Angeles campus building to take into account distance attenuation at the seventh floor of this building where receptors would be closest to the project's outdoor amenity areas.

[d] The 7th level of the future DTLA South Park Project is analyzed as it is the first level where residential uses would be located in the building.

[e] The existing average hourly daytime and nighttime ambient noise levels measured at NM2) are used to represent the existing ambient noise levels at the future DTLA South Park Project. As the existing daytime and nighttime levels measured at NM2 were conducted at the street level, these noise levels have been adjusted for the DTLA South Park Project to take into account distance attenuation at the seventh floor of this building where the closest residences to the project's Level five podium amenity area are located..

[f] The 40th level of the future DTLA South Park Project is analyzed as the residences on this level would be most exposed to noise levels generated at the outdoor amenity areas on both Levels 39 and 40 of the project building.

[g] Similar to the analysis for the 7th level at this future sensitive receptor, the existing daytime and nighttime ambient noise levels measured at NM2 were used and were adjusted to account for distance attenuation at the 40th floor of this building.

Composite Operational Noise Levels

The composite noise levels experienced by the nearby sensitive receptors due to all of the project's operational noise sources occurring concurrently are also evaluated to assess the potential maximum overall increase in ambient noise levels at these off-site receptor locations. For the purpose of this analysis, the composite noise levels generated during project operations are assessed at the nearest existing off-site sensitive receptors, which include the Axis Apartments building and the YWCA of Greater Los Angeles campus building located to the east and north of the project site, respectively, and the nearest future sensitive receptor, which is the DTLA South Park Project that is located west of the alley adjacent to the project site. These off-site receptor locations would experience noise levels generated by the project's parking structure, rooftop mechanical equipment, and outdoor amenity areas. Additionally, while the Axis Apartments building would be shielded by the project building itself from the noise generated at the loading area, the YWCA of Greater Los Angeles campus building would experience noise levels generated by this noise source as residents situated at the higher floors of this building would have a direct line-of-sight to this noise source. The proposed DTLA South Park Project would also be located in proximity to the project's loading area and would be exposed to noise levels from this noise source, although the resident floors would be located on levels 7 to 60 of this new building above six levels of parking and would be set back from the alley. As the project's emergency generators would only be operated during electrical power failures as well as periodically for testing and maintenance purposes, this equipment is not considered to be part of the project's daily operational noise sources and thus are not assessed as a contributor to the composite noise levels experienced by off-site receptors from project operations. The analysis of the project's composite operational noise levels is evaluated using the CNEL noise metric and is conducted using the following assumptions for each noise source:

- Outdoor Amenity Areas: Noise levels generated on levels five, 39, and 40 of the project building area are assumed to occur continuously between 7 a.m. to 10 p.m. and since there will be less activity at these outdoor areas during the late night, early a.m. hours, for four hours between 10 p.m. to 7 a.m.;

- Parking Structure: Noise levels that would be generated at the project parking structure by peak hour vehicle trips are assumed to occur continuously throughout the hours of 7 a.m. to 10 p.m. and since there will be less activity in the parking garage during the late night, early a.m. hours, for three hours between 10 p.m. to 7 a.m.;

- Rooftop Dry Coolers: Noise levels generated by the project's rooftop dry coolers are assumed to occur continuously for 24 hours per day; and

- Loading Area: Noise levels generated by the project's loading area are assumed to occur for four hours between 7 a.m. to 10 p.m. and one hour between 10 p.m. to 7 a.m.

It should be noted that this analysis of the project's composite operational noise levels is conservative in nature because it assumes that most of the project's stationary noise sources, with the exception of the loading area, are generating noise at the same time throughout the day. In practice, such occurrences are generally rare, as the timing of peak noise levels generated by one

noise source typically does not coincide with that of another noise source. For instance, the highest noise levels from the project's parking structure are expected to be generated during the peak weekday morning and evening hours when residents depart for and return from work, which would not normally coincide with the hours when the project's residential tenants are expected to use the outdoor amenity areas. Nonetheless, for the purpose of conducting a conservative analysis, the composite noise levels generated from all of the project's on-site noise sources at the nearest off-site sensitive receptors have been estimated and are shown in Table 6-31.

TABLE 6-31. COMPOSITE NOISE LEVELS FROM UNMITIGATED PROJECT OPERATIONS AT NEARBY SENSITIVE RECEPTORS

Operational Noise Source	Noise Levels (dBA CNEL)			
	Axis Apartments building to the east of project site	YWCA of Greater Los Angeles campus building to the north of project site	DTLA South Park Project Building	
			7th Level	40th Level
Outdoor Amenity Areas				
Level five Pool Amenity Deck[a]	61.0	52.6	60.5	51.9
Leve 39 Balcony Areas	40.0	37.4	40.0	46.1
Level 40 Tower Amenity Area	50.1	47.7	50.1	56.6
Parking Structure	45.6	33.5	35.7	30.0
Rooftop Equipment (Dry Coolers)	44.9	42.6	44.8	51.6
Loading Area	NA	35.5	44.4	43.8
Project-Related Traffic	49.2	46.4	45.3	38.7
Project Composite Noise Level	61.8	55.0	61.2	59.2
Existing Ambient Noise Level	67.3[b]	67.5[c]	66.3[d]	59.7[d]
Existing Ambient Plus Project Composite Noise Level	**68.4**	**67.8**	**67.5**	**62.5**
Increase Over Existing Ambient Noise Level Due to Project	1.1	0.2	1.2	2.8
Exceed 5 dBA?	No	No	No	No

[a] Noise level accounts for the operation of the outdoor speaker system.
[b] Existing 24-hour ambient noise level at Axis Apartments building is based on the long-term noise measurement conducted at the NM2 location (refer to Figure 6-1) and adjusted to take into account distance attenuation at the seventh floor of this building where receptors would be exposed to the highest noise levels generated from the project's operational noise sources.
[c] Existing 24-hour ambient noise level at YWCA of Greater Los Angeles campus building is based on the long-term noise measurement conducted at the NM1 location (refer to Figure 6-1) and adjusted to take into account distance attenuation at the seventh floor of this building where receptors would be exposed to the highest noise levels generated from the project's operational noise sources.
[d] Existing 24-hour ambient noise level at the future DTLA South Park Project location is based on the long-term noise measurement conducted at NM2 location (refer to Figure 6-1) and adjusted to take into account distance attenuation at the 7th and 40th floors where sensitive receptors would experience the highest noise levels from the project's operational noise sources.

As shown in Table 6-31, operation of the project would result in an increase in composite noise levels of 1.2 and 0.3 dBA CNEL at the Axis Apartments building and the YWCA of Greater Los Angeles campus building, which are the two nearest existing sensitive receptors to the project site. The future DTLA South Park Project would experience a maximum noise level increase of 3.0 dBA CNEL from the project's operational noise sources. None of these nearest receptors to the project site would experience an increase in ambient noise levels exceeding 5 dBA. As such, sensitive receptors that are located farther away from the project site would experience even lower composite

noise levels as those shown in Table 6-31. Because noise levels at off-site sensitive receptors would not be exceeded by 5 dBA or more during project operations, this impact is less than significant.

Land Use/Noise Compatibility

The project would consist of a 40-story mixed-use building with TORS units, residential, and commercial uses. Based on the noise measurement conducted at NM2, which would be representative of the immediate project area, a 24-hour noise level of 72 dBA CNEL was measured. This measured noise level, which was taken at the street level, would be representative of the noise level for the project's ground-floor commercial uses. Both the project's TORS and residential uses would be located on higher floors of the building, and as such noise levels at these TORS units and residential units would be lower than what was measured at the street level. Given the urbanized area where the project site is located, the existing noise environment in the project vicinity is generally dominated by traffic noise on local streets. To take into account these traffic noise sources and the reflective nature of the project site environment from existing nearby buildings, the noise levels at the project's TORS units and residential units were conservatively estimated based on noise attenuation provided by distance for a line source, where noise levels are attenuated by approximately 3 dBA per doubling of distance. Given that the noise measurement conducted at NM2 was conducted at approximately 25 feet from the center of 11th Street and that the 6th and 14th floors of the project building would be located at heights of approximately 79 and 164 feet from the ground level, respectively, the ambient noise levels at these floor levels were estimated. By accounting for distance attenuation at the 6th and 14th floors of this building, i.e., the first level of the TORS units and residential units, respectively, it is estimated that the resulting ambient noise levels would be approximately 67 dBA CNEL at the 6th floor uses and 64 dBA CNEL at the 14th floor residential uses. Based on the City's General Plan Noise Element land use/noise compatibility guidelines that are shown in Table 6-31, the ambient noise levels for the project's commercial, TORS and residential land uses would all fall under the "conditionally acceptable" range, which indicates that conventional construction (i.e., closed windows and fresh air supply systems or air-conditioning) of new development would suffice. Given that the proposed commercial, TORS, and residential uses associated with the project would be provided with these conventional construction features, the proposed project would be compatible with the City's noise/land use compatibility guidelines. Thus, impacts related to the project's consistency with the City's General Plan's noise/land use compatibility guidelines would be less than significant.

Conclusion

Compliance with regulatory measures and implementation of project design features PDF NOI-1, PDF NOI-2, and mitigation measures MM NOI-1and MM NOI-2 would ensure a less than significant impact with respect to construction noise and operational noise impacts.

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

Less Than Significant. A significant impact may occur if the project would generate groundborne vibration levels during construction and operations that would result in potential structural damage risks and human annoyance. The following analysis evaluates the potential groundborne vibration impacts at nearby noise-sensitive land uses resulting from construction and operation of the project.

As discussed below, both construction and operational vibration impacts would be less than significant and therefore would not require mitigation measures.

Groundborne Vibration Fundamentals

Groundborne vibration is a small, rapidly fluctuating motion transmitted through the ground. The effects of groundborne vibrations are typically limited to causing nuisance or annoyance to people, but at extreme vibration levels, damage to buildings may also occur.

In contrast to airborne sound, groundborne vibration is not a phenomenon that most people experience every day. The ambient groundborne vibration level in residential areas is usually much lower than the threshold of human perception. Most perceptible indoor vibration is caused by sources within buildings, such as mechanical equipment while in operation, people moving, or doors slamming. Typical outdoor sources of perceptible groundborne vibration are heavy construction activity (such as blasting, pile driving, or earthmoving), steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the groundborne vibration from traffic is rarely perceptible, even in locations close to major roads. The strength of groundborne vibration from typical environmental sources diminishes (or attenuates) fairly rapidly over distance.

For the prediction of groundborne vibration, the fundamental model consists of a vibration source, a receptor, and the propagation path between the two. The power of the vibration source and the characteristics and geology of the intervening ground, which affect the propagation path to the receptor, determine the groundborne vibration level and the characteristics of the vibration perceived by the receptor.

Displacement, Velocity, and Acceleration

When a vibration source (blasting, dynamic construction equipment, train, etc.) impacts the ground it imparts energy to the ground, creating vibration waves that propagate away from the source along the surface and downward into the earth. As vibration waves travel outward from a source, they excite the particles of rock and soil through which they pass and cause them to oscillate. The distance that these particles move is referred to as the *displacement* and is typically very small, usually only a few ten-thousandths to a few thousandths of an inch. *Velocity* describes the instantaneous speed of the motion, and *acceleration* is the instantaneous rate of change of the speed. Each of these measures can be further described in terms of *frequency* and *amplitude*. Although displacement is generally easier to understand than velocity or acceleration, it is rarely used to describe groundborne vibration because most transducers used to measure vibration directly measure velocity or acceleration, not displacement.

Frequency and Amplitude

The frequency of a vibrating object describes how rapidly it is oscillating. The unit of measurement for the frequency of vibration is Hz (the same as used in the measurement of noise), which describes the number of cycles per second.

The amplitude of displacement describes the distance that a particle moves from its resting (or equilibrium) position as it oscillates and can be measured in inches. The amplitude of vibration

velocity (the speed of the movement) can be measured in inches per second (in/s). The amplitude of vibration acceleration (the rate of change of the speed) can be measured in inches per second per second.

Vibration Descriptors

As noted above, there are various ways to quantify groundborne vibration based on its fundamental characteristics. Because vibration can vary markedly over a short period of time, various descriptors have been developed to quantify vibration. The two most common descriptors used in the analysis of groundborne vibration are peak particle velocity and vibration velocity level, each of which are described below:

- **Peak Particle Velocity (PPV)** is defined as the maximum instantaneous positive or negative peak amplitude of the vibration velocity. The unit of measurement for PPV is in/s. Unlike many quantities used in the study of environmental acoustics, PPV is typically presented using linear values and does not employ a dB scale. Because it is related to the stresses that are experienced by buildings, PPV is generally accepted as the most appropriate descriptor for evaluating the potential for building damage (both FTA and the California Department of Transportation [Caltrans] guidelines recommend using PPV for this purpose). It is also used in many instances to evaluate the human response to groundborne vibration (Caltrans guidelines recommend using PPV for this purpose).

- **Vibration Velocity Level (L_V)** describes the rms vibration velocity. Due to the typically small amplitudes of groundborne vibrations, vibration velocity is often expressed in decibels, calculated as follows:

  $L_v = 20 \times \log_{10}(V/V_{ref})$

  where *V* is the actual rms velocity amplitude and V_{ref} is the reference velocity amplitude. It is important to note that there is no universally accepted value for V_{ref}, but the accepted reference quantity for vibration velocity in the U.S. is 1 micro-inch per second (1×10^{-6} inches/second). The abbreviation VdB is commonly used for vibration decibels to distinguish from noise level decibels. L_V is often used to evaluate human response to vibration levels (Federal Transit Administration guidelines recommend using L_V for this purpose).

Effects of Groundborne Vibration

Vibration can result in effects that range from annoyance to structural damage. Annoyance or disturbance of people may occur at vibration levels substantially below those that would pose a risk of damage to buildings.

Potential Building Damage

When groundborne vibration encounters a building, vibrational energy is transmitted to the structure, causing it to vibrate. If the vibration levels are high enough, damage to the building may occur. Depending on the type of building and the vibration levels, this damage could range from

cosmetic architectural damage (e.g., cracked plaster, stucco, or tile) to more severe structural damage (e.g., cracking of floor slabs, foundations, columns, beams, or wells). Buildings can typically withstand higher levels of vibration from transient sources than from continuous or frequent intermittent sources. Transient sources are those that create a single, isolated vibration event, such as blasting or drop balls. Continuous or frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment. Older, fragile buildings (which may include important historical buildings) are of particular concern. Modern commercial and industrial buildings can generally withstand much higher vibration levels before potential damage becomes a problem.

Human Disturbance or Annoyance

Groundborne vibration can be annoying to people and can cause serious concern for nearby neighbors of vibration sources, even when vibration is well below levels that could cause physical damage to structures. Groundborne vibration is almost exclusively a concern inside buildings and is rarely perceived as a problem outdoors, where the motion may be discernible but there is less adverse reaction without the effects associated with the shaking of a building. The normal frequency range of most groundborne vibration that can be felt generally starts from a low frequency of less than 1 Hz to a high of about 200 Hz.

Numerous studies have been conducted to characterize the human response to vibration, and, over the years, numerous vibration criteria and standards have been suggested by researchers, organizations, and governmental agencies. These studies suggest that the thresholds for perception and annoyance vary according to duration, frequency, and amplitude of vibration. For transient vibration sources (single, isolated vibration events such as blasting), the human response to vibration varies from barely perceptible at a PPV of 0.04 in/s, to distinctly perceptible at a PPV of 0.25 in/s, and severe at a PPV of 2.0 in/s. For continuous or frequent intermittent vibration sources (such as impact pile driving or vibratory compaction equipment), the human response to vibration varies from barely perceptible at a PPV of 0.01 in/s, to distinctly perceptible at a PPV of 0.04 in/s, and severe at a PPV of 0.4 in/s.[102]

Thresholds of Significance

The City currently has not established any regulatory standards for groundborne vibration in the LAMC or in the Noise Element of the General Plan. While there are also no state vibration standards that would be directly applicable to the project, guidance published by Caltrans nonetheless provides groundborne vibration quantitative criteria that are useful in establishing thresholds for significant impacts. Caltrans' widely referenced *Transportation and Construction Vibration Guidance Manual* provides guidance for two types of potential vibration impacts: (1) damage to structures, and (2) annoyance to people. Guideline criteria for each are provided in Table 6-33 and Table 6-34.

[102] California Department of Transportation (Caltrans). Transportation and Construction Vibration Guidance Manual. April 2020.

TABLE 6-33. CALTRANS GUIDELINE VIBRATION DAMAGE CRITERIA

Structure and Condition	Maximum PPV (in/s)	
	Transient Sources	Continuous/Frequent Intermittent Sources
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5

Source: Caltrans 2013.
Notes: Transient sources create a single, isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

TABLE 6-34. CALTRANS GUIDELINE VIBRATION ANNOYANCE CRITERIA

Human Response	Maximum PPV (in/s)	
	Transient Sources	Continuous/Frequent Intermittent Sources
Barely perceptible	0.04	0.01
Distinctly perceptible	0.25	0.04
Strongly perceptible	0.9	0.10
Severe	2.0	0.4

Source: Caltrans 2013.
Notes: Transient sources create a single, isolated vibration event, such as blasting or drop balls. Continuous/ frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

Thus, because the City has not established regulatory standards for groundborne vibration, the lead agency has determined to use the quantitative criteria published by Caltrans to assess potential structural damage risks and human annoyance resulting from groundborne noise and vibration as the threshold of significance for this analysis.

Construction Vibration

The operation of heavy construction equipment at the project site would generate groundborne vibration that could affect structures immediately adjacent to the project site. These vibration levels could also cause an annoyance to people at those locations. The closest existing structures in the vicinity of the project site include:

- Hill Grill restaurant at 1061 South Hill Street located approximately 55 feet from project site
- Los Angeles Job Corps Center at 215 West 11th Street located approximately 55 feet from the project site
- Belasco Theater building at 1050 South Hill Street located approximately 120 feet from the project site

- Axis Apartments building at 1100 South Hill Street located approximately 85 feet from the project site
- Bank of America building at 1127 South Hill Street located approximately 70 feet from the project site

In addition to these existing structures, the future DTLA South Park Project, which could potentially be in operation during project construction, would also be located directly west of the alley adjacent to the project site at 1120 South Olive Street. For the purpose of this analysis, the Belasco Theater building is considered to fall under the "historic and some old buildings" category under Caltrans vibration guidelines as this theater was built back in 1926. The Axis Apartments building, which was recently constructed, and the future DTLA South Park Project building are both considered to be a "new residential structure," while the Los Angeles Job Corps Center and bank of America buildings are considered to be "modern industrial/commercial buildings under Caltrans vibration guidelines. The Hill Grill, which appears to be an older commercial structure, is conservatively evaluated as a "older residential structure" under the guidelines. Referring to the Caltrans guideline criteria in Table 6-32, the PPV thresholds for potential building damage from continuous and frequent intermittent sources are 0.5 in/s for both modern commercial buildings and new residential structures, 0.3 in/s for older residential structures, and 0.25 in/s for historic buildings.

Construction of the project would not require high-impact construction methods such as pile driving or blasting. As such, groundborne vibration would be generated from conventional heavy construction equipment, such as bulldozers, backhoes, loaders, and excavators, during project construction. Table 6-35 shows the estimated construction-related groundborne vibration levels that could occur at the nearest off-site structures to the project site, based on the use of either large (full-size) or smaller (mini-size) mobile equipment (e.g., bulldozers, backhoes, loaders), and the resulting vibration impacts at these locations related to potential building damage and human annoyance.

TABLE 6-35. GROUNDBORNE VIBRATION LEVELS AT OFF-SITE RECEPTOR LOCATIONS

Off-Site Receptor Location	Approximate Distance to Project Site (feet)	Large Mobile Equipment[a]			Small Mobile Equipment[b]		
		Estimated PPV (in/s)	Building Damage?[c]	Human Response[d]	Estimated PPV (in/s)	Building Damage?[c]	Human Response[d]
Hill Grill restaurant located north of project site	55	0.037	No	Barely perceptible	0.001	No	Below barely perceptible
Los Angeles Job Corps Center located north of project site	55	0.037	No	Barely perceptible	0.001	No	Below barely perceptible
Belasco Theater building located northeast of project site	120	0.016	No	Barely perceptible	0.001	No	Below barely perceptible
Axis Apartments building located east of project site	85	0.023	No	Barely perceptible	0.001	No	Below barely perceptible
Bank of America building located south of project site	70	0.029	No	Barely perceptible	0.001	No	Below barely perceptible
Future mixed-use DTLA South Park Project located west of the alley adjacent to the project site at 1120 S. Olive Street	19[e]	0.120	No	NA[f]	0.004	No	NA[f]
	24[g]	0.093	NA	Distinctly perceptible	0.003	NA	Below barely perceptible
	91[h]	0.022	No	Barely perceptible	0.001	No	Below barely perceptible

[a] Representative of any full-size/large excavator, dozer, loader, etc.
[b] Representative of any small excavator, dozer, loader, etc.
[c] Based on Caltrans vibration guidelines, the Belasco Theater is considered to be a historic buildings, the Axis Apartment building and future DTLA South Park Project are considered to be new residential structures, and the Los Angeles Job Corps Center and Bank of America buildings are considered to be modern commercial buildings. The Hill Grill, which is an older commercial structure, is considered to be an "older residential structure" for the purpose of providing a conservative analysis. Referring to the Caltrans guideline criteria shown in Table 6-33, the PPV thresholds for both modern commercial buildings and new residential structures are 0.5 in/s for, the PPV threshold for an older residential structure is 0.3 in/s, and the PPV threshold for a historic building is 0.25 in/s.
[d] Refer to Table 6-34 for Caltrans vibration annoyance criteria.
[e] The presented distance is from the project site to the six-story above-ground parking structure of the DTLA South Park Project.
[f] As the DTLA South Park Project's parking structure is not considered to be a sensitive receptor, only building damage from vibration is analyzed.
[g] As the DTLA South Park Project would have ground-floor retail uses, the vibration impacts related to human annoyance for these non-sensitive receptors are analyzed.
[h] The presented distance is from the project site to the residential floors of the DTLA South Park Project.

As shown in Table 6-35, even with the use of large, full-size mobile equipment at the project site the vibration levels generated during project construction would not exceed the applicable vibration criteria for building damage or human annoyance at the nearest surrounding existing and future off-site structures. Of the nearby receptors analyzed in Table 6-35, only the future ground-floor retail uses at the DTLA South Park Project would experience distinctly perceptible vibration levels, while all of the other receptors would experience vibration levels that are barely perceptible. While vibration during project construction would be distinctly perceptible at times at the future retail uses, these occurrences would only occur briefly throughout the day when a large mobile equipment is operating near the project site boundary directly across the alley from these uses. Once the equipment moves to another location within the project site that is farther away the vibration levels would dissipate rapidly and would be barely perceptible. Additionally, retail land uses are not considered to be vibration-sensitive uses as these locations do not involve people trying to relax or sleep, and patrons are generally transient visitors that do not stay for an extended amount of time. As shown in Table 6-35, the vibration levels at all of the nearby sensitive land uses to the project site would be barely perceptible. Consequently, off-site receptors farther from the project site would also not be exposed to excessive groundborne vibration levels during project construction. Therefore, impacts would be less than significant.

Project Operation

As the project is a mixed-use development a with TORS units, residential, and commercial uses, there would be no major sources of vibration resulting from operation of the project. While operation of on-site mechanical equipment such as HVAC equipment and exhaust fans could produce low levels of vibration, these vibration levels would only occur in the immediate area where the equipment is located within the project building and would not result in any impacts at nearby off-site structures. Given that the operation of construction equipment at the project site would not result in vibration levels that would exceed the applicable vibration criteria for building damage or human annoyance at the nearest surrounding off-site structures (refer to Table 6-35), any vibration levels generated by the project's on-site mechanical equipment would also not result in perceptible vibration levels at nearby off-site structures. Therefore, impacts related to groundborne vibration and noise during project operations would be less than significant.

Conclusion

Groundborne vibration and groundborne noise impacts related to building damage and human annoyance during project construction and operation would be less than significant without the need for mitigation.

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

No Impact. The project site is not in the vicinity of a private airstrip or airport land use plan or within two miles of a public airport of public use airport. The nearest airport to the project site is the Hawthorne Municipal Airport approximately 9 miles to the southwest, followed by the Los Angeles International Airport approximately 10 miles to the southwest. Therefore, the project

would not expose people residing or working in the project area to excessive noise levels generated from this airport, and no impacts would occur.

Conclusion

No impact would occur in this regard and no mitigation measures are required.

Cumulative Impacts

Cumulative noise or vibration impacts can occur when two or more projects are under construction simultaneously or generate operational noise or vibration at the same time. Because noise and vibration are localized effects that decrease with distance from the source, significant cumulative impacts do not typically occur unless two or more projects are close to a single receptor. The presence of any natural or manmade barriers (e.g., hills, topography, walls, buildings) between a project site and a receptor will increase the rate of noise reduction over distance and will further reduce any cumulative noise levels.

Related projects in the vicinity of the noise- and vibration-sensitive receptors considered in this analysis include construction activities that could occur simultaneously with construction of the project, depending on project timing. For the reasons discussed above, construction noise and vibration levels at any single receptor are typically dominated by the closest construction activity. As a result, the chances of construction noise from more distant related project sites making a substantial contribution to overall noise levels at the same receptor is generally low. Nonetheless, incremental increases in total construction noise levels could occur. Based on the related projects list provided in the project's TA, the nearest related project to the project site would be the proposed mixed-use DTLA South Park Project at 1120 South Olive Street, which is west of the alley adjacent to the project site. Additionally, other related projects that are also located in the immediate proximity of the project site include the mixed-use project at 1105 South Olive Street located approximately 255 feet to the west, the mixed-use project at 1030 South Hill Street located approximately 330 feet to the northwest, and the mixed-use project at 1111 South Broadway located approximately 215 feet to the east. Given these distances of the nearest related projects in the immediate project site area, a substantial increase in construction noise levels in the project area could potentially occur should construction of these related projects occur at the same time as the project.[103] It should be noted that while the DTLA South Park Project and 1105 South Olive Street related project currently have a direct line-of-sight to the project site, the other related project locations identified (i.e., 1030 South Hill Street and 1111 South Broadway) currently have existing intervening buildings between those sites and the project site. Nonetheless, because some of these intervening structures are sensitive noise uses (e.g., residential), these uses would experience construction noise levels from both the related projects and the project should they be constructed at the same time. Thus, the concurrent construction of the project and nearby related projects could

[103] While the future DTLA South Park Project has been analyzed as a sensitive receptor that would be in operation during construction of the proposed project, there is also the potential that this related project could undergo construction during the same time as the proposed project.

potentially contribute to cumulative construction noise impacts on existing noise-sensitive uses that are currently interspersed throughout the South Park neighborhood in proximity to the project site.

While cumulative construction noise levels could result, each of the related projects would be subject to LAMC Section 41.40, which limits the hours of allowable construction activities, and it is assumed that each of these projects would comply with this regulation. Each of the related projects would also be subject to Section 112.05 of the LAMC, which prohibits any powered equipment or powered hand tool from producing noise levels that exceed 75 dBA at a distance of 50 feet from the noise source within 500 feet of a residential zone. Noise levels are only allowed to exceed this noise limitation under conditions where compliance is technically infeasible. With conformance to LAMC Sections 41.40 and 112.05, construction-related noise levels generated by related projects would not exceed City noise regulations or standards. As discussed under Section 6.13a above, the highest estimated construction-related noise levels that could result from the project would only exceed 75 dBA L_{eq} at the Axis Apartments building during the one-day concrete pour for the project's building foundation while the project's construction noise levels during the rest of the construction schedule would not exceed 75 dBA L_{eq} at any of the nearest surrounding sensitive receptors in the project area. Implementation of MM NOI-1 would reduce the noise levels at the Axis Apartments building by requiring the implementation of various noise-minimizing measures during the concrete pour activities, including the erection of an 8-foot-high temporary barrier around the project site. With implementation of MM NOI-1, technically feasible measures to reduce noise levels in accordance with Section 112.05 of the LAMC would be implemented and impacts would be reduced to a less-than-significant level. Additionally, because the project's one-day concrete pour would be conducted over approximately 20 hours and would involve construction activities occurring outside of the City's permissible construction hours (i.e., between 7:00 a.m. to 9:00 p.m.), the proposed project would also implement MM NOI-2 to require the obtainment of a Board of Police Commissioners Permit for the concrete pour activities. With the obtainment of this permit, the project's concrete pour activities would comply with the provisions of Section 41.40 of the LAMC and impacts associated with violation of the permissible construction hour provisions of the LAMC would be less than significant. Therefore, the project would not result in a cumulatively considerable contribution to construction noise impacts in the vicinity of the project.

With respect to operational noise, on-site noise levels associated with each of the related projects would be subject to the applicable City noise regulations (e.g., such as LAMC Sections 112.01, 112.02, 112.04, 114.02, and 114.03) to ensure that their noise levels would not adversely affect adjacent land uses. While the nearest related project to the project site would be the proposed mixed-use DTLA South Park Project at 1120 South Olive Street, which is directly adjacent to the project site to the west, compliance with City noise regulations would prohibit noise levels from this related project from exceeding the noise levels on adjacent properties by more than 5 dBA. Additionally, while the concurrent operation of the project and other related projects nearby could potentially result in a higher noise environment in the project area, existing sensitive receptors in the area would not necessarily experience a substantial increase in their ambient noise levels as each related project and the project would also serve as physical noise barriers against each other as well. For instance, the project's 40-story building would serve as an intervening structure that would reduce the operational noise levels generated by the DTLA South Park Project that would

be experienced at the Axis Apartments building located farther to the east. Cumulative mobile source noise impacts would occur primarily as a result of increased traffic on local roadways due to the project and related projects within the study area. However, as shown in Table 6-29, cumulative development along with the project (i.e., "future with project" traffic noise levels) would increase local noise levels by a maximum of 4.1 dBA CNEL at the roadway segment of 12th Street, west of Olive Street, which would be below the applicable threshold of 5.0 dBA CNEL at this roadway segment.[104] As the increase in noise levels at all of the remaining analyzed roadway segments would not exceed 3.0 dBA CNEL, the noise increase on these roadway segments would also not be substantial. Therefore, the cumulative impact associated with mobile source noise would be less than significant.

Because vibration impacts are assessed based on instantaneous maximum peak levels (PPV), worst-case groundborne vibration levels from construction are generally determined by whichever individual piece of equipment generates the highest vibration levels. As a result, the vibration from multiple construction sites, even if the sites are near each other, does not generally combine to raise the maximum PPV, and the cumulative effect is no more severe than the effect from the largest individual contribution. Thus, even though the DTLA South Park Project would be directly adjacent to the project site and construction activities could potentially occur concurrently at these two sites, the maximum PPV generated by any single piece of heavy construction equipment at these two sites would not be combined to result in a greater PPV at any particular off-site receptor. When also taking into account the rapid attenuation of groundborne vibration (e.g., the vibration levels at all immediate nearby structures to the project site would be barely perceptible even with the use of large off-road mobile equipment [refer to Table 6-35]), the project and this nearest related project would not result in more severe vibration levels at nearby sensitive receptor locations should construction of this related project occur at the same time as the project. Therefore, future development would result in a less-than-significant cumulative impact in terms of groundborne vibration.

Conclusion

Given the localized effects of noise and vibration, and the distance of the expected related projects in the immediate vicinity of the project site along with the implementation of mitigation measures during project construction, cumulative noise and vibration impacts would not be cumulatively considerable.

[104] The 5.0 dBA CNEL threshold is applicable to this roadway as the "future with project" traffic noise level would be 59.3 dBA CNEL, which falls under the "conditionally acceptable" category identified in Table 6-30 for sensitive land uses.

6.14 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 (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	☐	☐	☒	☐
b.	Displace a substantial number of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

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)?

Less Than Significant Impact. Per State CEQA Guidelines Section 15064(e), economic and social changes resulting from a project shall not be treated as significant effects on the environment. Economic or social changes may be used, however, to determine that a physical change shall be regarded as a significant effect on the environment. If the physical change causes adverse economic or social effects on people, those adverse effects may be used as a factor in determining whether the physical change is significant. A significant impact could occur if the project would locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing unplanned growth and creating a physical change causing adverse economic or social effects. The project would provide infill development within a currently developed urban setting. It would not add new infrastructure beyond that required to connect the project to existing utility lines, and adjacent roadways. Therefore, the project would not open new areas to development or promote development in an area not otherwise expected to be developed.

The project would replace the existing vacant warehouse with a mixed-use building containing TORS units, residential, and commercial uses. The project's mix of uses would result in an increase in employment population at the project site and an increase in residential population and housing units. The project would provide up to 319 multi-family residential condominiums, 160 TORS units and up to 3,429 square feet of ground floor commercial uses. The changes in project site population are reported in Table 6-36**,** *Estimated Population Growth*. The estimated household size for converting the project's number of residences to a project site population, 2.82 people per household, reflects the Citywide Person Per Household factor as published in the 2019 U.S. Census Bureau, Population Estimates Program.[105]

[105] https://www.census.gov/quickfacts/fact/table/losangelescitycalifornia#. Accessed June 10, 2020.

As shown in Table 6-36, the project's residential use is estimated to generate 900 new residents. It should be noted however, that this is a conservative estimate as over half of the total number of new residential units would be studio and one-bedroom units.

The project would result in an increase of 159 employees on the project site. As restaurant and TORS workers would likely come from the regional employment pool and are unlikely to move into the immediate area for new unemployment opportunities provided on the project site. As such, indirect population growth due to employment would be negligible.

TABLE 6-36. ESTIMATED POPULATION GROWTH

Use	Units or Square Feet	Average Household Size[a] or Employment Generation Factor[b]	Total Population or Employees
Population			
Total Housing Units	319	2.82	900
Employees			
Proposed TORS units	115,068	0.00113	130
Proposed Restaurant	3,429	0.00271	9
Residential Support[c]	-	-	20
Total Employment			159

a The average household size reflects the Citywide Person Per Household factor, as published in the 2019 Census Quickfacts. https://www.census.gov/quickfacts/losangelescitycalifornia.Accesed June 10, 2020
b The employee generation factors are taken from the Los Angeles Unified School District, 2020 Developer Fee Justification Study, March 2020. https://achieve.lausd.net/cms/lib/CA01000043/Centricity/Domain/921/LAUSD%20Dev%20Fee%20Study%202020_Final.pdf The TORS use is based on the lodging employee generation factor; the restaurant use is based on the Neighborhood Shopping Centers employee generation factor.
c Estimate from Project Applicant. Employees include leasing agents, management, security, maintenance staff, etc. that support residential uses.
Please note the number of employees and population is derived from different factors than the VMT calculation in Section 6.17 Transportation. The total population and employees for the VMT Calculator was calculated within the VMT Calculator tool, as described in the City of Los Angeles VMT Calculator Documentation. Per the Documentation, the multi-family household population rate was derived from City of Los Angeles census data, and employment data for the TORS and high-turnover sit-down restaurant uses came from a variety of sources, such as the Institute of Transportation Engineers trip generation rates and the 2012 San Diego Association of Governments Activity Based Model. These population and employment totals were only used within the VMT Calculator tool to calculate the total and per capita VMT, and were not used for further analysis elsewhere, so these totals may differ from other population and employment totals calculated based on other sources.
Source: ICF, 2021.

As indicated in Table 6-36, the project would replace existing vacant warehouse uses with TORS units and commercial development and would result in an increase of 159 employees. The interpolated 2020 baseline population, housing and employment estimates for the City of Los Angeles, the estimated growth projections for 2026 (project buildout year), and SCAG's 2045 growth projections (SCAG Projection Horizon), all based on the SCAG 2020-2045 RTP/SCS,[106] are shown below in Table 6-37, *Projected Population, Housing and Employment Estimates for the City of Los Angeles*, and are discussed in more detail below.[107] As shown in Table 6-37, between 2020 and 2026, the City's population is expected to grow by 4.3 percent, the number of

[106] https://www.connectsocal.org/Documents/Draft/dConnectSoCal_Demographics-And-Growth-Forecast.pdf Accessed July 19, 2021.

[107] The 2020 baseline estimates were determined by interpolating from data presented in the SCAG projections based on values provided for 2016 and 2045. The 2020 estimate is calculated by: [((2045 data – 2016 data) / 29 years) * 4 years)] + 2016 data = 2020 baseline estimate. The 2026 estimate is calculated by: [((2045 data – 2016 data) / 29 years) * 10 years)] + 2016 data = 2026 buildout estimate. The 2045 estimates are provided by SCAG.

households/occupied housing units is expected to increase by 6.2 percent, and the number of employees is expected to grow by 3.2 percent.

TABLE 6-37. PROJECTED POPULATION, HOUSING AND EMPLOYMENT ESTIMATES FOR THE CITY OF LOS ANGELES

	2020 (Project Baseline)	2026 (Project Buildout Year)			2045 (SCAG Projection Horizon)		
		Projected	Total Growth	Percentage Increase as Compared to 2020	Projected	Total Growth	Percentage Increase as Compared to 2020
Population	4,049,317	4,222,593	173,276	4.3%	4,771,300	721,983	17.8%
Housing	1,425,759	1,513,897	88,138	6.2%	1,793,000	367,241	25.8%
Employment	1,887,969	1,947,472	59,503	3.2%	2,135,900	247,931	13.1%

Source: Based on SCAG data prepared for the 2020-2045 RTP/SCS. Compiled by ICF, 2021.

As shown in Table 6-38, the project is estimated to result in a new residential population of approximately 900 residents and 159 new employees. These project contributions are compared, in Table 6-38, *Project Population, Housing, and Employment Impacts for the City of Los Angeles*, to the growth projections shown in Table 6-38 from the SCAG 2020-2045 RTP/SCS for the City.

TABLE 6-38. PROJECT POPULATION, HOUSING, AND EMPLOYMENT IMPACTS FOR THE CITY OF LOS ANGELES

	Project Increase	SCAG Projected Growth	Project Percentage of Growth
Population			
2020–2026 Buildout	900	173,276	0.5%
2020–2045 Projection Horizon	900	721,983	0.1%
Households			
2020–2026 Buildout	319	88,138	0.4%
2020–2045 Projection Horizon	319	367,241	0.1%
Employment			
2020–2026 Buildout	159	59,503	0.3%
2020–2045 Projection Horizon	159	247,931	0.1%

Source: Based on SCAG data prepared for the 2020-2045 RTP/SCS. Compiled by ICF, 2021.

As shown in Table 6-38, the project's estimated 900 residents would be well within, and would comprise less than 1.0 percent of, SCAG's estimated 2026 population growth of 173,276 persons for the City. SCAG's longer-term projected 2045 population increase for the City is 721,983 residents; the project's residential population would also be well within, comprising approximately 0.1 percent of, SCAG's total population increase for the City between 2020 and 2045.

The project would induce planned population growth directly through the introduction of 319 housing units on the project site, which currently has no residential uses. However, as Table 6-38 shows, the project's 319 housing units would be well within SCAG's year 2026 estimated increase of 88,138 households within the City and would comprise 0.4 percent of that figure. The project's

new housing units would also be well within SCAG's 2045 estimated increase of 367,241 households within the City and would comprise 0.1 percent of that figure. The project's estimated 159 new employees would also be well within and would comprise less than 0.01 percent of the SCAG's 2045 estimated total employment growth for the region.

As shown in Table 6-38, the project's contributions to growth fall within the range of growth accounted for in the SCAG projections that are used for future planning activities and provision of services.

In addition, the project's growth would contribute toward the attainment of City and regional goals and policies to encourage housing development in the greater Los Angeles area. In particular, Objective 4.2 of the Housing Chapter states that the City should "[e]ncourage[s] the location of new multifamily housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher-density developments and surrounding lower-density residential neighborhoods."[108]

The project is located within a TPA and complies with City and regional policies regarding the location of development and preferred development patterns for the region, including locating new development near transit and employment centers. The SCAG RHNA, as addressed in the City's General Plan Housing Element, identifies needed housing stock to meet regional housing needs.

The 2021-2029 Housing Element was adopted by the City Council on November 24, 2021.[109] The City's 2021-2029 Housing Element must accommodate a 6th cycle RHNA allocation of 456,643 new housing units of which 184,721 units (40 percent) are designated for very low and low-income households, 75,091 units are for moderate income households (17 percent), and 196,831 units (43 percent) would be for above moderate-income households. These figures are more than five times higher than the prior 5th RHNA cycle allocation. This significant increase is primarily the result of changes in state law that included new markers of existing housing needs such as overcrowding and cost burden in the RHNA.

Thus, the project, and its 319 new residential units, would support the RHNA by contributing to the overall housing supply.

Therefore, for all of the above reasons, the project's provision of residential and employment development at the project site is substantially consistent with the planned growth and sustainability policies of SCAG's 2020-2045 RTP/SCS. The population growth generated by the project is considered to be substantially consistent with the City's and SCAG's growth policies.

[108] City of Los Angeles, General Plan Framework, Chapter 4 Housing, Goals, Objectives, and Policies. https://planning.lacity.org/cwd/framwk/chapters/04/04.htm Accessed June 29, 2021.

[109] City of Los Angeles. *General Plan Housing Element.* Available https://planning.lacity.org/plans-policies/housing-element. Accessed: December 14, 2021.

Conclusion

Impacts with respect to inducing substantial unplanned population growth would be less than significant and no mitigation measures are required.

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

No Impact. The project site is currently developed with a vacant warehouse building. There are no housing units or people dwelling on the project site. No housing would be removed or destroyed, and no displacement would occur.

Conclusion

No impact would occur with respect to the displacement of people or housing that would necessitate the construction of replacement of housing elsewhere. No mitigation measures are required.

Cumulative Impacts: Population and Housing

Of the 35 development and transportation projects on the related projects list, 28 include residential components. These 28 related projects include a total of 9,925 housing units with a corresponding estimated population of 27,989 persons without taking into account any existing residential units that might be demolished to allow for development of the related projects.

When combined with the project's 319 new units and increase of 900 in population, the total number of new housing units is 10,244 units and the total increase in population would be 28,889. The total number of employees for the related projects would be 2,877 employees and, when combined with the project's 159 new employees, the total number of employees would be 3,036.

Table 6-39, *Cumulative Population, Housing, and Employment Growth within the City of Los Angeles*, compares the growth of these related projects, together with the project, to the 2020-2045 RTP/SCS 2045 horizon year projections. The projections focus on the SCAG 2020-2045 RTP/SCS 2045 horizon year as opposed to the project's 2026 buildout date, since it would be speculative to make assumptions with respect to the buildout dates for each of the related projects used in this analysis. Additionally, SCAG projections incorporate regional policies and are based on long-term demographic trends. The 2045 horizon year serves as the basis for preparation of SCAG's long-range regional plan, policies and strategies for transportation improvements and regional growth throughout the SCAG region. The 2045 projections also serve as a basis for the planning of services, utilities and other infrastructure improvements by regional agencies and local jurisdictions.

TABLE 6-39. CUMULATIVE POPULATION, HOUSING, AND EMPLOYMENT GROWTH WITHIN THE CITY OF LOS ANGELES

	Cumulative Increase Including Proposed Project	SCAG Projected Growth	Cumulative Percentage of Growth
Population	28,889	721,983	4.0%
Households	10,244	367,241	2.8%
Employment	3,036	247,931	1.2%

Source: Based on SCAG data prepared for the 2020-2045 RTP/SCS. Compiled by ICF, 2021.

The 2045 projections take into account long term regional development trends. Actual development within shorter time frames or localized areas may vary slightly from the projected rates, but short-term variations average out over time. SCAG's regular monitoring of factors affecting growth in the region, allows the projections to remain suitable for use by service agencies for their long term planning.

The cumulative growth shown in Table 6-39 reflects a broad mix of development including residential, hotel, office and retail uses, and miscellaneous uses. The related projects would be implemented over a longer time period than the expected buildout date of the project, with many developments consisting of longer-range plans for development and/or phased developments that would extend further out in time.

The Central City area is currently developed with a substantial infrastructure system in place to meet the needs of current and anticipated development, consistent with growth patterns identified in applicable SCAG and City plans. Furthermore, the cumulative development is within the planned growth estimates and growth distribution patterns accounted for within the SCAG projections and policies. As reported in Table 6-39, the estimate of cumulative growth for population, housing, and employment is well within the projected estimates for the City. The estimate of cumulative population growth in the larger project site vicinity, the 28,889 new people to the area, constitute 4 percent of the population growth for the 2045 horizon year. The 10,244 cumulative dwelling units within the City constitutes 2.8 percent of SCAG's projected housing growth in the City by 2045. The employment population associated with the cumulative growth would represent 1.2 percent of the projected new employment population Citywide by year 2045. As discussed above, the projected cumulative population, household, and employment growth would be within the 2045 SCAG projections identified in the 2020-2045 RTP/SCS for the City, in an area that is currently built out with existing infrastructure intended to be the site of future planned growth. All the related projects are being proposed and/or developed in existing, developed areas, and would be consistent with plan policies that serve as a guide for providing services and infrastructure. As the Downtown area is substantially built out, the related projects would largely replace surface parking lots and underutilized commercial properties. The related projects would increase residential development overall, so even if there were displacement from related projects, the amount of new total housing would far exceed the displaced housing, if any, and on a cumulative level. As such, construction of additional replacement housing would not be necessary. Moreover, the City has very robust requirements for replacement housing obligations including policies for the preservation of rent stabilized and covenanted affordable units. As such, the project would not make a cumulatively considerable contribution to this less than significant displacement of housing impact.

Conclusion

There would be a less than significant cumulative impact from unplanned population and housing growth or from displacing substantial numbers of existing people or housing that would require replacement housing elsewhere and would not be cumulatively considerable.

6.15 Public Services

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:					
a.	Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or a 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 following public services:				
	Fire protection?	☐	☐	☒	☐
	Police protection?	☐	☐	☒	☐
	Schools?	☐	☐	☒	☐
	Parks?	☐	☐	☒	☐
	Other public facilities?	☐	☐	☒	☐

Would the project result in substantial adverse physical impacts associated with the provisions of new or physically altered governmental facilities, 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:

Appendix J, *Public Services Responses* provides a record for correspondence with public service providers.

a. Fire protection?

Less Than Significant Impact. A significant impact to fire protection and emergency services would occur if the project would result in a substantial adverse physical impact associated with the provision of new or physically altered fire protection facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services.

Fire protection and emergency medical services for the project site are provided by LAFD. The LAFD's approximately 3,435 uniformed personnel and 381 civilian support staff provide fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education, and community service.[110] At any given time, there are

[110] Los Angeles Fire Department, Department, Overview, Website, https://www.lafd.org/about/about-lafd/our-mission, accessed August 26, 2021.

approximately 1,018 uniformed firefighters on-duty at 106 fire stations across the LAFD's 469 square-mile jurisdiction.[111]

LAFD fire stations within the proximity of the project site include Fire Station 10, Fire Station 9, Fire Station 11, and Fire Station 3.[112] Table 6-40, *LAFD Fire Stations Located in the Vicinity of the Project Site*, provides information on the location, the approximate distance/direction from the project site and the average response time. As shown in Table 6-40, in almost all instances, the LAFD Fire Stations serving the project site have a shorter response time than the citywide average. The citywide average for Emergency Medical Services (EMS) calls is 6:50 minutes; for non-EMS calls it is 6:26 minutes; for Critical Advanced List Support (ALS) calls it is 5:52 minutes; and for structural calls it is 5:02 minutes.[113]

Construction

Construction activities associated with the project may temporarily increase the demand for fire protection and emergency medical services, and may cause the occasional exposure of combustible materials, such as wood, plastics, sawdust, covering and coatings, to heat sources including machinery and equipment sparking, exposed electrical lines, welding activities, and chemical reactions in combustible materials and coatings. However, in compliance with the requirements of OSHA, all construction managers and personnel would be trained in fire prevention and emergency response. Furthermore, fire suppression equipment specific to construction would be maintained on the project site. As applicable, construction activities would be required to comply with the 2019 California Building Code (CBC), the California Fire Code (CFD), and Article 7: Fire Protection and Prevention (Fire Code) of Chapter V: Public Safety and Protection, of the LAMC.

TABLE 6-40. LAFD FIRE STATIONS LOCATED IN THE VICINITY OF THE PROJECT SITE

Fire Station[a]	Address[a]	Approximate Distance/Direction from Project Site	Average Operational Response Time[b]
Fire Station 10	1335 S Olive Street	0.3 mile (1,500 feet)	6:36 (EMS) 6:04 (non EMS) 5:26 (Critical ALS) 4:51 (Structural Fire)
Fire Station 9	430 7th Street	0.9 mile	6:21 (EMS) 5:51 (non EMS) 5:11 (Critical ALS) 4:11 (Structural Fire)
Fire Station 11	1819 7th Street	1.3 miles	6:09 (EMS) 5:21 (non EMS) 5:08 (Critical ALS) 3:43 (Structural Fire)

[111] These figures represent the number of uniformed firefighters that are available to respond to emergency calls and do not include other on-duty uniformed firefighters that are involved in training or various administrative and support functions (Source: Los Angeles Fire Department, Department Overview, https://www.lafd.org/about/about-lafd/our-mission, accessed August 26, 2021)

[112] Los Angeles Fire Department, Fire Stations, Find Your Station, Website https://www.lafd.org/fsla/stations-map, July 28, 2020 and Google Maps, accessed July 19, 2021.

[113] https://www.lafd.org/fsla/stations-map. Accessed July 19, 2021

Fire Station[a]	Address[a]	Approximate Distance/Direction from Project Site	Average Operational Response Time[b]
Fire Station 3	108 N Fremont Avenue	1.36 miles	6:48 (EMS) 5:50 (non EMS) 5:23 (Critical ALS) 4:55 (Structural Fire)

Structural Fire: The type of call reserved when the Los Angeles Police Department receives a report of a building or structure that is actively burning.
EMS = Emergency Medical Services; ALS = Advanced Life Support
Sources:
[a] From January to June 2020. LAFD, Find Your Station. https://www.lafd.org/fsla/stations-map.
[b] FIRESTATLA http://www.lafd.org/fsla/stations-map. Accessed July 19, 2021.

Pedestrian and vehicular access to properties located near to the project site would be open for the duration of construction. The sidewalks at the project frontages along South Hill Street and 11th Street would be closed for the duration of construction, but access would be provided via a covered pedestrian canopy and walkway along those project frontages.

For the duration of construction, the rightmost southbound lane on South Hill Street would be closed, and both northbound lanes would remain open. The closest fire station is LAFD Station 10 located approximately 0.3 mile from the project site at 1335 South Olive Street. As at least one travel lane in each direction on South Hill Street would remain open, this would not prevent fire department vehicles or other emergency services from traveling to or past the project site along South Hill Street. During construction, the existing vehicle travel lane along 11th Street would remain open, but the four parking spots adjacent to the project site, which are currently not metered, will be closed. LAFD and other emergency vehicles traveling along Olive Street would continue to have access to one westbound lane on 11th Street, as is the case under existing conditions.

In addition, the project would implement a Construction Management Plan (PDF TRAF-1) that would minimize construction impacts. The Construction Management Plan would include measures such as off-site truck staging; scheduling deliveries and pick-ups of construction materials during non-peak travel periods; a worksite traffic control plan; use of flag men to reroute traffic around any closures; establishment of requirements for loading/unloading and storage of materials to ensure that access would remain unobstructed for land uses in proximity to the project site; and coordination with the City and emergency service providers to ensure adequate access is maintained to the project site and adjacent uses. Due to the limited duration of construction activities, the project site's proximity to four fire stations, implementation of a Construction Management Plan, and compliance with applicable codes, project related construction would not be expected to adversely impact firefighting and emergency services so as to necessitate a new or expanded fire station in order to maintain acceptable service ratios, response times, or other performance objectives of the LAFD. Moreover, consistent with *City of Hayward v. Trustees of California State University* (2015) 242 Cal.App.4th 833, significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of a project, and potential impacts on public safety services are not an environmental impact that CEQA requires a project applicant to mitigate.

Therefore, construction impacts on fire protection and emergency medical services would be less than significant and no mitigation measures are required.

Operations

Operational activities associated with the project would increase the demand for fire protection and emergency medical services. As discussed under Section 5.14.a, the project's estimated 900 residents would represent approximately 0.5 percent of the population growth forecasted by SCAG in the City of Los Angeles between 2020 and 2026.

Because the project is located within a designated TPA and within an area meeting SCAG's definition of a TPA and HQTA, and is consistent with the City's the population growth projections, any new growth generated by the project is considered consistent with the City's and SCAG's growth policies.

The new building associated with the project would also be subject to compliance with fire protection design standards, as necessary, per the California Building Code, California Fire Code, the LAMC, and the LAFD to ensure adequate fire protection. Key components of these regulatory requirements that would be implemented as part of the project pursuant to LAFD review and guidance include the following:

- **Building Design:** Fire resistant doors and materials, as well as walkways, stairwell and elevator systems (including emergency and fire control elevators) that meet code requirements.

- **Fire Safety Features:** Installation of automatic sprinkler systems, smoke detectors and appropriate signage and internal exit routes, if not already installed, to facilitate a building evacuation if necessary; as well as a fire alarm system, building emergency communication system and smoke control system.

- **Emergency Safety Provisions:** Implementation of an Emergency Plan in accordance with LAMC Section 57.33.19. The emergency plan would establish dedicated personnel and emergency procedures to assist the LAFD during an emergency incident (e.g., floor wardens, evacuation paths); establish a drill procedure to prepare for emergency incidents; establish an on-site emergency assistance center; and establish procedures to be followed during an emergency incident. Provision of on-site emergency equipment and emergency training for personnel to reduce impacts on the increased need for emergency medical services.

- **LAFD Access:** Access for LAFD apparatus and personnel to the project site in accordance with LAFD requirements, inclusive of standards regarding fire lane widths and weight capacities needed to support fire fighting vehicles, markings and on-site vehicle restrictions to ensure safe access. Emergency vehicles and fire access to the project site and surrounding area would be provided along South Hill Street and West 11th Street.

The City of Los Angeles requires that plans for building construction, fire flow requirements, fire protection devices (e.g., sprinklers and alarms), fire hydrants and spacing, and fire access including ingress/egress, turning radii, driveway width, and grading would be prepared for review and approval by the LAFD. While helicopter landing facilities are required on all high-rise buildings in

the City (LAFD Requirement No.10) the Fire Prevention Bureau's Requirement 10 for Emergency Helicopter Landing Facilities (EHLF) allows for two alternatives to a fully FAA-approved landing facility.[114] These alternatives include more limited helicopter landing facilities and/or replacing such EHLF facilities with a number of safety features inclusive of sprinkler systems designed to meet specific standards, video camera systems, and other building design safety features. The project would provide an alternative pursuant to Regulation 10 upon demonstration that it meets the required sprinkler and other building design requirements.

The project site is not located in an area of moderate or very high fire hazard.[115] In addition, the project site is surrounded by urban development and is not adjacent to any wildlands. Therefore, no fuel modification for fire fuel management would be required, nor would the project be subject to wildfire risk.

Another important component of ensuring fire protection services is the availability of adequate firefighting water flow. Fire flow requirements are closely related to land use. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazards. The water infrastructure in the vicinity of the project site includes an existing 12-inch water main in 11th Street, and existing 6-inch and 12-inch water mains in South Hill Street. There are two existing fire hydrants adjacent to the project site. The first hydrant is located on the west side of South Hill Street. approximately 43 feet south of the centerline of 11th Street. The second hydrant is located on the west side of South Hill Street approximately 312 feet south of the centerline of 11th Street.[116]

Fire water flow requirements, as determined by the LAFD, vary by project site as they are dependent on land use (e.g., higher intensity land uses require higher flow from a greater number of hydrants), life hazard, occupancy, and fire hazard level. The maximum distance between hydrants should be 300 feet. As set forth in Section 57.507.3.1 of the LAMC, fire water flow requirements vary from 2,000 GPM in the Low Density Residential land use category to 12,000 GPM in the High Density Industrial and Commercial land use category. Industrial and Commercial land use requires 6,000 to 9,000 GPM from four to six fire hydrants flowing simultaneously.[117] As the project includes commercial uses, it would need to meet the Industrial and Commercial fire flow requirements. To serve the project, two new public fire hydrants would be installed for a total of four hydrants that would ultimately serve the project. An Information of Fire Flow Availability Request (IFFAR) was submitted to LADWP for four hydrants flowing simultaneously at 6,000 GPM on May 7, 2020, to assess the pressures of multiple hydrants flowing simultaneously and to determine if any water main upgrades would be required to meet the LAFD requirements. LADWP

[114] Los Angeles Fire Department, Office of the Fire Marshal, Los Angeles Fire Department Requirement No. 10. Emergency Helicopter Landing Facilities (EHLF), https://www.lafd.org/sites/default/files/pdf_files/EHLF-Reg10.pdf. Accessed July 19, 2021.

[115] Zimas Website, http://zimas.lacity.org/, accessed July 19, 2021.

[116] 1111 Hill Street Project Utilities Technical Memorandum August 26, 2021.

[117] 1111 Hill Street Project Utilities Technical Memorandum August 26, 2021.

approved the IFFAR on May 20, 2020, which indicates that upgrades to the water mains are not expected.[118]

In addition, a Service Availability Report (SAR) approved on August 26, 2021 for two proposed fire water connections to the building. The pressure reporting from the SARs indicates that the existing 12 inch water main on 11th Street can provide 51 psi of pressure from a single 5,000 GPM water service connection. It also demonstrates that the existing 12 inch main in South Hill Street also could provide 42 psi of pressure from a 5,000 GPM water service connection if additional water supply was required. These two results demonstrate that the adjacent water infrastructure is sufficient to meet the project's fire water demands.

According to the General Plan Framework Element, the City distance standard for EMS services is 1.5 miles. As shown in Table 6-40, four LAFD Stations are located near the project site within 1.5 miles; satisfying the standard with LAFD Station 10 located approximately 0.3 mile from the project site. Also, fire stations have access to multiple routes to attend emergency calls. As mentioned above, four fire stations are within less than two miles of the project site. These LAFD fire stations would provide fire protection and emergency medical services to the project area and are dispatched based on availability and the nearest unit to a service call. The project-related increase in traffic on surrounding roadways could potentially affect emergency response times in the area. A number of factors would serve to facilitate responses to emergency calls. Emergency response is routinely facilitated, particularly for high priority calls, through use of sirens to clear a path of travel, driving in lanes of opposing traffic, use of alternate routes, and multiple station response. The project vicinity is well served by four nearby fire stations within close proximity to one another and the project site.

There are a number of additional factors that influence emergency response times in addition to traffic, including alarm transfer time, alarm answering and processing time, mobilization time, risk appraisal, signals, and roadway characteristics. The LAFD has taken a number of steps to improve its related systems, processes and practices. Upgrades include installation of automated vehicle locating systems on all LAFD apparatus; replacement of fire station alerting systems that control fire station dispatch audio, signal lights, and other fire station alerting hardware and software; development of a new computer aided dispatch system to manage fire and emergency medical service incidents from initial report to conclusion of an incident; and, use of traffic pre-emption systems. A traffic pre-emption system allows the normal operation of traffic lights to be preempted by an emergency vehicle to improve response times by stopping conflicting traffic in advance, providing the emergency vehicle the right-of-way. The project site is located outside of hazardous/hillside areas. Because of the grid pattern of the local street system and the proximity to multiple freeways, each of the nearby fire stations has multiple routes available to respond to emergency calls at the project site.

The project would submit building plans to the LAFD and incorporate LAFD's recommendations relative to fire safety into the building plans, including any potential modifications to building plans to reduce the risk and susceptibility of spread of fires, and would be determined by LAFD in its

[118] 1111 Hill Street Project Utilities Technical Memorandum August 26, 2021.

expert discretion upon full construction level design of the project. Based on the ability of LAFD to respond to emergency situations, the close proximity of four LAFD stations, and accessibility of fire stations in the project vicinity and the multiple steps being taken by the LAFD to improve response times, project impacts on fire protection, services, and response times are considered less than significant.

With incorporation of applicable regulatory requirements (i.e., building design, fire safety features, emergency safety provisions, LAFD access) ability to meet fire water supply needs, and close distance to several LAFD stations, implementation of a Construction Management Plan, the project is not expected to result in a substantial increase in demand for additional fire protection services that would exceed the capability of the LAFD to serve the project such that it would require construction of new fire facilities. Furthermore, the LAFD would review the project and make recommendations, including any potential modifications to building plans to reduce the risk and susceptibility of spread of fires, as determined by LAFD. LAFD would continue to monitor population growth and land development throughout the City and identify additional resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City's regular budgeting efforts, LAFD's resource needs would be identified and monies allocated according to the priorities at the time. The project, as well as the related projects, would also generate revenues to the City's General Fund (in the form of property taxes, sales tax revenue, etc.) that could be applied toward the provision of fire services, as deemed appropriate by the City. Through the City's regular budgeting efforts, LAFD's resource needs would be identified and monies allocated according to the priorities at the time.

Conclusion

Based on the above, and with the incorporation of project design feature PDF-TRAF-1, the addition of a new fire facility, or the expansion, consolidation, or relocation of an existing facility, is not foreseeably needed to maintain service and the potential for a physical impact associated with the construction of fire facilities is considered less than significant and no mitigation measures are required.

b. Police protection?

Less Than Significant. A significant impact on police protection services would occur if the project would result in a substantial adverse physical impact associated with the provision of new or physically altered police facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police services. Police protection for the project site is provided by the Los Angeles Police Department (LAPD). The LAPD consists of approximately 9,985 sworn officers and 2,961 civilian employees.[119] The population to officer ratio is 402.2 residents for every one officer (402.2:1). The LAPD operates 21 police stations within four bureaus: Central Bureau, South Bureau, Valley Bureau, and West Bureau. Each of the Bureaus encompasses several communities.

[119] LAPD communication dated June 23, 2020 and December 15, 2021 (Appendix J)

The project site is located in the Central Bureau of the LAPD, which includes the Central, Hollenbeck, Newton, Rampart, Central Traffic Division.[120]

The project would be under the jurisdiction of Central Community Police Station, located at 251 E. 6th Street, Los Angeles, approximately 1 mile from the project site. The Central Community Police Station serves the Bunker Hill/Historic Core, Central City East, Chinatown, Civic Center, Downtown Los Angeles, Fashion District, Jewelry District, Little Tokyo, Old Bank District, Solano Canyon, South Park-Entertainment, and Toy District, which is a culturally diverse area with a population of approximately 47,500 people. The Central Division has approximately 437 sworn personnel and 21 civilian support staff. The officer to resident ratio is one officer to every 177.5 residents (177.5:1).[121] There are many specialized support units, divisions and services available to the Central Division with the LAPD (i.e., Air Support, Detectives, K9 and Metro) to support any additional policing needs. These services are available to supplement and complement the division's policies services.[122]

According to the LAPD's Compstats Division, the average police response time to emergency high priority calls in the Central Area was 3.2 minutes (from May 31, 2020, to June 27, 2020). Low priority, non-emergency response times was 21.2 minutes. This is a faster response time than Citywide calls. Citywide response times during this same period was 4.3 minutes for emergency high priority calls. Low-priority response times were 31.8 minutes.[123] The LAPD indicates that these response times are adequate performance times.

The LAPD indicates that there are no planned improvements to police facilities in the service area of the project site and the project would not require special police protection requirements. The LAPD also indicates that the project individually or combined with other present and future projects would not result in the need for a new or altered police facility.[124]

Table 6-41, *Crime Statistics for the Central Area*, summarizes the crime statistics for the Central Service Area for 2020, 2019, 2018 and 2017 with most of the crimes related to property crime and personal theft.

TABLE 6-41. CRIME STATISTICS FOR THE CENTRAL AREA

Crime	YTD 2020	2019	2018	2017
Violent Crime	535	1,996	1,935	2,089
Property Crime	1,593	5,828	5,599	4,889
Homicide	3	17	14	21
Rape	33	152	146	158
Robbery	175	722	687	720

[120] The Los Angeles Police Department, Central Bureau, http://www.lapdonline.org/central_bureau Accessed June 30, 2020.

[121] LAPD communication dated June 23, 2020 and December 15, 2021 (Appendix J)

[122] LAPD communication dated June 23, 2020 and December 15, 2021 (Appendix J)

[123] LAPD communication dated June 23, 2020 and December 15, 2021 (Appendix J)

[124] LAPD communication dated June 23, 2020 and December 15, 2021 (Appendix J)

Crime	YTD 2020	2019	2018	2017
Aggravated Assault	324	1,105	1,078	1,190
Burglary	160	354	360	376
Motor Vehicle Theft	126	414	421	395
Burglary Theft from Vehicle	612	1,775	1,768	1,369
Personal/Other Theft	695	3,285	3,050	2749

YTD = year to date
Source: LAPD communication dated June 23, 2020 (Appendix J)

Construction

During construction, equipment and building materials could be temporarily stored on site, which could result in theft, graffiti, and vandalism. However, the project site is located in an area with high vehicular and pedestrian activity and visibility from South Hill Street and 11th Street. In addition, PDF-PS-1 states the construction site would be fenced along the perimeter to minimize trespassing, vandalism, short-cut attractions and attractive nuisances.

Construction activities are expected to be primarily contained within the project site boundaries. Pedestrian and vehicular access to properties located nearby to the project site would be open for the duration of construction. The sidewalks at the project frontages along South Hill Street and 11th Street would be closed for the duration of construction, but access would be provided via a covered pedestrian canopy and walkway along those project frontages.

For the duration of construction, the rightmost southbound lane on South Hill Street would be closed, and both northbound lanes would remain open. As at least one travel lane in each direction on South Hill Street would remain open and would not prevent police or other emergency services from traveling to or past the project site along South Hill Street. During construction, the existing vehicle travel lane along 11th Street would remain open, but the four parking spots adjacent to the project, which are currently not metered, would be closed. LAPD and other emergency vehicles traveling along Olive Street would continue to have access to one westbound lane on 11th Street, the same as existing conditions.

In addition, the project would implement a Construction Management Plan (PDF-TRAF-1) that would minimize construction impacts. The Construction Management Plan would include measure such as off-site truck staging; scheduling deliveries and pick-ups of construction materials during non-peak travel periods; a worksite traffic control plan; use of flag men to reroute traffic around any closures; establishment of requirements for loading/unloading and storage of materials to ensure that access would remain unobstructed for land uses in proximity to the project site; and coordination with the City and emergency service providers to ensure adequate access is maintained to the project site and adjacent uses. Given the visibility of the project site from adjacent roadways and surrounding properties, existing police presence in the City of Los Angeles, maintained emergency access, and construction fencing discussed in PDF-PS-1, and the fact that the LAPD has indicated that the project would not require special police protection, there are no new LAPD facilities planned near the project, and the project would not require the need for new or altered police facilities, the project's construction activities are not expected to increase demand on

existing police services to an extent that a new police facility would be required. Therefore, the project would have a less than significant temporary impact on police protection.

Operations

Operational activities associated with the project would increase demand for police protection services. The project's 319 residential units are estimated to result in an increase in the residential population of approximately 900 residents. The project's estimated 900 residents would be well within, and would comprise less than 1.0 percent of, SCAG's estimated 2026 population growth of 173,276 persons. Because the project is located within a designated City of Los Angeles TPA and within an area meeting SCAG's definition of a TPA and HQTA, the population growth generated by the project is considered consistent with the City's and SCAG's planned growth policies.

The project would follow the LAPD recommendations to encourage project design that incorporates strategies from Crime Prevention through Environmental Design (CPTED). CPTED is intended to look beyond traditional policing methods to address public safety, thus reducing the amount of police officers that would otherwise be required. CPTED provides a series of strategies and design recommendations that can be used by project planners/architects. Recommended design practices use the location of activities within the project site, as well as other site features including, the use of paths, lighting, entryways, and security features (locks/gates/signs) to enhance site safety. These features improve safety and reduce crime by providing visual connection/natural surveillance and discouraging criminal activity.

As discussed in Section 2, *Project Description*, the project would incorporate security measures for the safety of residents, TORS guests, employees, and visitors to the project site. During operation of the project, traffic access to the residential parking areas from South Hill Street would be controlled and access to the lower levels would be remain open for commercial and TORS parking. Access to parking via the alley entrance would be controlled though gated entries outside of business hours and the entry areas would be well illuminated. Site security would include controlled keycard access to residential and TORS areas, parking areas, patrolled security for TORS areas, secured entry and exit points to all buildings, alarmed systems for commercial areas, and security lighting within common areas and entryways, and closed-circuit TV monitoring (CCTV).

The project would require a master conditional use application for sale and service of alcoholic beverages (LAMC Sec. 12.24(W)(1)) on the project site related to TORS units and commercial uses. The option to serve alcoholic beverages with or without meal service is consistent for many surrounding restaurant and hotel uses in the immediate area. Additional conditions tailored to each specific venue with the project site would be imposed under each individual Approval of Plans. These conditions may include, but are not limited to, alcohol sales training by the LAPD, the term limit of the grant, security requirements, limited hours of operation, required additional landscaping features, and valet and parking requirements. Thus, providing alcohol sales within a carefully controlled, high-quality mixed-use development, with appropriate security measures and conditions would not require additional police demand.

Emergency response to a site is routinely facilitated, particularly for high priority calls, through use of sirens to clear a path of travel, driving in the lanes of opposing traffic, use of alternative routes,

and multiple station response. Emergency access to the project site and surrounding uses would be maintained at all times and emergency vehicles would have priority and the ability to bypass signals and stopped traffic. Thus, project-related traffic is not anticipated to impair the LAPD from responding to emergencies at the project site. In addition, the Downtown Center Business Improvement District (DCBID) provides safety patrols 24 hours a day, seven days a week by foot, bike, Segway, and motor vehicle. These patrols help to control public street disorder. They serve as additional eyes and ears for local law enforcement and provide supplemental safety services during large-scale Downtown LA events.[125]

The project would provide adequate access for emergency vehicles to the project site subject to the approval of the LAPD. Prior to the occupancy of the project, the Applicant would provide the LAPD with a diagram of the property, including access routes, and additional information to facilitate potential LAPD responses (see PDF-PS-2). As indicated by the LAPD, there are no planned improvements to police facilities in the service area of the project site and the project would not create special police protection requirements. Furthermore, the LAPD also indicates that the project individually or combined with other present and future projects would not result in the need for a new or altered police facility.[126] Accordingly, impacts associated with emergency response times and emergency access are considered less than significant.

Overall, given the incremental change to the population served by the Central Community Police station created by the project, the lack of planned improvements to police facilities in the service area of the project site, the indication by the LAPD that the project would not create special police protection requirements, the project's planned on-site security measures, the project would not result in a substantial increase in demand for additional police protection services that would exceed the capability of the LAPD to serve the project such that it would require construction of new police facilities.

Project Design Features

- **PDF-PS-1:** A construction fence shall be constructed around the project site to minimize trespassing, vandalism, short-cut attractions and attractive nuisances.

- **PDF-PS-2:** Prior to the occupancy of the project, the Applicant shall provide the Central Area Commanding Officer with a diagram of each portion of the property, including access routes, and additional information to facilitate potential LAPD responses.

- **PDF PS-3**: The project would incorporate security measures for the safety of residents, TORS guests, employees, and visitors to the project site. During operation of the project, traffic access to the residential parking areas from South Hill Street would be controlled and access to the lower levels would be remain open for commercial and TORs unit parking. Access to parking via the alley entrance would be controlled though gated entries outside of business hours and the entry areas would be well illuminated. Site security would include controlled keycard access to residential and TORs unit areas, parking areas,

[125] https://downtownla.com/the-dcbid/safe-and-clean/safety-team Accessed August 26, 2021
[126] LAPD communication dated June 23, 2020 and December 15, 2021 (Appendix J)

patrolled security for TORs units areas, secured entry and exit points to all buildings, alarmed systems for commercial areas, and security lighting within common areas and entryways, and closed-circuit TV monitoring (CCTV).

Conclusion

Based on the analysis above, and with the incorporation of project design features PDF-TRAF-1, PDF PS-1, PDF PS-2, and PDF PS-3, the addition of a new police facility, or the expansion, consolidation, or relocation of an existing facility, is not foreseeably needed to maintain service and the potential for a physical impact associated with construction of police facilities is considered less than significant and no mitigation measures are required.

c. Schools?

Less Than Significant Impact. A significant impact to school services would occur if the project would result in a substantial adverse physical impact associated with the provision of new or physically altered school facilities, construction of which could cause a significant environmental impact, in order to maintain acceptable service ratios or other performance objectives for school services. The project would be served by the Los Angeles Unified School District (LAUSD). The LAUSD is the largest (in terms of number of students) public school system in California and the second-largest in the U.S. The LAUSD encompasses approximately 710 square miles and serves the City of Los Angeles, all or portions of 25 other cities, as well as several unincorporated areas of Los Angeles County.[127] Approximately 4.8 million persons live within the District's boundaries. The LAUSD provides kindergarten through high school (K–12) education to a total of 562,905 students with a total enrollment of 628,468 students when including adult and early childhood education students.[128]

According to the LAUSD, the project site is located within the attendance boundaries of Ninth Street Elementary School, John Liechty Middle School, and seven schools or programs within the Belmont High School Zone of Choice.[129] A Zone of Choice is a geographic area comprising multiple high school options. The LAUSD's Zones of Choice is a strategy whereby LAUSD increases the number of personalized educational options available to students. Schools and programs that are part of a "school choice area" pull enrollments from the area school(s) that have resident attendance boundaries. The seven schools associated with the Belmont High School Zone of Choice include the Miguel Contreras Learning Center-Los Angeles School of Global Studies, Miguel Contreras Learning Complex-School of Business and Tourism, Miguel Contreras Learning Complex - School of Social Justice, Miguel Contreras Learning Center Complex – School of

[127] LAUSD, Fingertip Facts 2021-2022 LAUSD, https://achieve.lausd.net/site/handlers/filedownload.ashx?moduleinstanceid=66505&dataid=109597&FileName=Fingertip_Facts_2021_2022_ENG.pdf Accessed August 26, 2021.

[128] LAUSD, Fingertip Facts 2021-2022 LAUSD, https://achieve.lausd.net/site/handlers/filedownload.ashx?moduleinstanceid=66505&dataid=109597&FileName=Fingertip_Facts_2021_2022_ENG.pdf Accessed August 26, 2021.

[129] LAUSD Correspondence, Vincent Maffei, Director, Facilities Services Division. September 30, 2021. (Appendix J)

Academic Leadership Community, Ramon C. Cortines, Grand Arts School of Visual and Performing Arts, Belmont High School, and Edward R. Roybal Learning Center.[130]

According to the LAUSD, the Ninth Street Elementary School and the Belmont High School Zoe of Choice is currently operating below capacity, while the John Liechty Middle School is not operating within capacity.[131] Per the LAUSD, available seating capacity is based on residential enrollment (i.e., defined by LAUSD as the number of students living in a school's attendance area who are eligible to attend the school even though many students living in a school's attendance area would attend private schools or charter schools). The capacity of the John Liechty Middle School is 1,096 seats with an actual enrollment of 962 students. Therefore, based on actual enrollment, there is currently available capacity at these schools.

Construction

Construction of the project would require construction employees that would be hired from a mobile regional construction work force that moves from project to project. Typically, construction workers pass through various development projects on an intermittent basis as their particular trades are required. Given the mobility and short durations of work at a particular site, and a large construction labor pool that can be drawn upon in the region, construction employees would not be expected to relocate residences within this region or move from other regions as a result of their work on the project. Therefore, project construction would not generate a significant amount of new students needing to attend local schools that would require the addition of a new school facility or expanding.

Operation

Project operation would incrementally increase demand for school services but not such that it would require the addition of a new school facility, or the expansion, consolidation, or relocation of an existing facility in order to maintain service. The project's estimated 900 residents would comprise less than 1.0 percent of SCAG's estimated 2026 population growth of 173,276 persons for the City.

The project would result in an increase of 159 employees on the project site. If new employees currently reside in neighboring communities and have school children, it is expected the children would remain enrolled in their current school. However, if some new employees with school age children choose to move closer to work, or if some new employees with children are hired from the surrounding community or another City, there could be negligible change in student population in the nearby schools.

Using LAUSD student generation rates, the project is estimated to generate 172 students.

[130] LAUSD Correspondence, Vincent Maffei, Director, Facilities Services Division. September 30, 2021. (Appendix J)

[131] LAUSD Correspondence, Vincent Maffei, Director, Facilities Services Division. September 30, 2021. (Appendix J)

TABLE 6-42. ESTIMATED NUMBER OF STUDENTS TO BE GENERATED BY THE PROJECT

Land Use	Development	Units	Elementary School	Middle School	High School	Special Day Class (SDC[c])	Total
Residential[a]	319	units	72	19	41	6	139
Commercial[b]	3,429	square feet					2
TORS units[b]	115,068	square feet					31
Total							**172**

[a] Student Generation Rates for Residential Uses are taken from the Development School Fee Justification Study, LAUSD, March 2020. Grades TK-6 = 0.2269; Grades 7-8= 0.0611, Grades 9-12=0.1296, SDC = 0.0194 totaling 139 students
[b] For each 1,000 square feet of non-residential space (lodging 115,068 square feet = 0.266 /1,000 square feet = 31 students) (commercial 3,429 square feet = 0.638/1,000 square feet = 2 students,
c A Special Day Class is a classroom in which students with disabilities are enrolled and the teacher has a special education credential
Note: Number of students has been rounded up, in order to provide whole student number counts.
Source: Development School Fee Justification Study, LAUSD, March 2020 and ICF 2021.

This number is conservative in that it assumes that none of the future project residents with families would already have students attending the affected schools and that it is possible that a portion of the project's school-age children would likely attend private schools or charter schools, thus reducing attendance at LAUSD schools.

Students generated by the project, if not attending private or charter schools, would attend Ninth Street Elementary School, John Liechty Middle School, and a high school within the Belmont High School Zone of Choice. As indicated by the LAUSD, the Ninth Street Elementary School and the John Liechty Middle School are expected to exceed capacity within five years.[132]

The projected school enrollments are based on LAUSD projections for new development that take into account an assessment of anticipated growth in student enrollments. The estimates of seating shortages are conservative as they do not take into account students choosing to attend other LAUSD schools located farther from their home attendance area (e.g., charter schools, or schools of greater convenience), students enrolling in private schools, students already residing within the school boundaries, and home schooling. Per the LAUSD, available seating capacity is based on residential enrollment compared to the respective school's current capacity. It may be noted that if the variations between actual enrollment and residential enrollment were to be similar to those occurring today, there would be excess seating at the Ninth Street Elementary School and John Liechty Middle School.

Future new students could potentially be accommodated through the use of such mechanisms as temporary classrooms, additions to existing schools, increased classroom size, families taking advantage of LAUSD's open enrollment policy, and use of multitrack calendars. LAUSD indicates regarding the project that "no new school construction is planned."[133] As such, the project would

[132] LAUSD Correspondence, Vincent Maffei, Director, Facilities Services Division. September 30, 2021. (Appendix J)

[133] LAUSD Correspondence, Vincent Maffei, Interim Director, Facilities Services Division. July 24, 2020 and January 11, 2022. (Appendix J)

not result in the need for a new school facility, and therefore, there would be no impact from the construction of such a facility.

In accordance with the Greene Act of 1998 (SB 50), the Applicant will pay school fees to LAUSD to offset the impact of additional student enrollment at schools serving the project area (RCM-PS-1). The payment of these fees are deemed by state law to provide full and complete mitigation under CEQA for a project's potential impacts to school facilities.

Regulatory Compliance Measures

RCM-PS-1 The Applicant shall pay school fees to the Los Angeles Unified School District to offset the impact of additional student enrollment at schools serving the project area.

Conclusion

With payment of school fees, the impact of construction and operations on school services and facilities would be less than significant and no mitigation measures are required.

d. Parks

Less Than Significant Impact. A significant impact to park services would occur if the project would result in substantial adverse physical impacts associated with the provision of new or physically altered park facilities, construction of which could cause a significant environmental impact, in order to maintain acceptable service ratios or other performance objectives for park services. The Los Angeles Department of Recreation and Parks (LADRP) is responsible for the establishment, operation, and maintenance of parks and recreational facilities in the City. These facilities include parks, swimming pools, public golf courses, recreation centers, museums, youth camps, tennis courts, sports programs and programs for senior citizens. The LADRP also supervises construction of new facilities and improvements to existing ones. Currently, the LADRP maintains over 16,000 acres of parkland within approximately 444 regional, community and neighborhood parks, and dozens of pocket and specialty parks. LADRP maintains and operates hundreds of athletic fields, 422 playgrounds, 321 tennis courts, 184 recreation centers, 72 fitness areas, 62 swimming pools and aquatic centers, 30 senior centers, 26 skate parks, 13 golf courses, 12 museums, nine dog parks, and 187 summer youth camps.[134]

The City of Los Angeles overall has a ratio of 0.84 acre of neighborhood or community parkland per 1,000 residents. The Central City Community Plan, within which the project is located, has a parkland acres-to-population ratio for neighborhood parks of 0.10 acre per 1,000 residents. This also pertains to community parks; however, ideally community parks should have 20 acres which include facilities and programs offered at a larger radius. The City's General Plan, sets a goal of a parkland acres-to-population ratio of 10 acres of parkland per 1,000 residents.[135]

[134] City of Los Angeles, Los Angeles Department of Recreation and Parks website "Who We Are" http://www.laparks.org/department/who-we-are. Accessed June 9, 2020.

[135] LARDP Correspondence, Cathie M. Santo, Acting Assistant General Manager, April 14, 2020 and January 11, 2022. (Appendix J)

The project area is served by several public parks and recreational facilities. The following LADRP neighborhood parks and recreational facilities are located within a two-mile radius of the project site: 6th and Gladys Street Park (624 E. 6th Street); Alvarado Terrace Park (1342 S. Alvarado Terrace); Arts District Park (501 S. Hewitt Street); City Hall Park (200 N. Spring Street); El Pueblo De Los Angeles Historic Monument (845 N. Alameda Street); Grand Hope Park (900 S. Hope Street); Hope and Peace Park (843 S. Bonnie Brae Street); Leo Politi Elementary Community School Park (2481 W. 11th Street); Los Angeles Plaza Park (125 E. Paseo De La Plaza); Nevin Avenue Park (1527 and 1531 E. 32nd Street); Patton Street Pocket Park (303-305 and 317-327 N. Patton Street); Pico Union Park (1827 S. Hoover Street); Rockwood Community Park (1571 W. Rockwood Street); Saint James Park (20 S. Saint James Park); San Julian Park (312 E. 5th Street); Spring Street Park (428 S. Spring Street); Unidad Park (1644-1648 W. Beverly Boulevard); and Valencia Triangle (1425 W. 8th Street).[136]

In addition, parks and public open space not under LADRP jurisdiction that are within a 2-mile radius of the project site include: Grand Park (200 N. Grand Avenue), Venice Hope Park (1521 S Hope Street), Vista Hermosa Park (100 N Toluca Street), and Maguire Gardens (520 Flower Street).

The following LADRP community parks located within a 5-mile radius of the project site include: 1st and Broadway Civic Center Park (217 W. 1st Street); Alpine Recreation Center (817 Yale Street); Augustus F. Hawkins Park (5790 S. Compton Avenue); Carlin G. Smith Recreation Center (511 W. Avenue 46); Central Recreation Center (1357 E. 22nd Street); Challengers Boys and Girls Club Track and Field (1046-1056 and 1047-1057 W. 51st Street); Cypress Recreation Center (2630 N. Pepper Avenue); Denker Recreation Center (1550 W. 35th Place); Downey Recreation Center (1775 N. Spring Street); Echo Park (751 Echo Park Boulevard); Echo Park Deep Pool (1419 Colton Street); Eleanor Green Roberts Aquatic Center (4526 W. Pico Boulevard); Elysian Valley Recreation Center (1811 W. Ripple Street); Evergreen Recreation Center (2839 E. 4th Street); Expo Center (3980 S. Bill Robertson Lane); Fred Roberts Recreation Center (4700 S. Honduras Street); Gilbert W. Lindsay Community Center (429 E. 42nd Place); Hazard Park (2230 E. Norfolk Street); Hollenbeck Park (415 S. St. Louis Street); Hoover Recreation Center (1010 W. 25th Street); Jackie Tatum Harvard Recreation Center (1535 W. 62nd Street); James Slauson Recreation Center (5306 S. Compton Avenue); Lafayette Park (2830 W. 6th Street); Lake Street Community Center 227 N. Lake Street); Lemon Grove Recreation Center (4959 W. Lemon Grove Avenue); Lincoln Heights Recreation Center (2303 N. Workman Street); Lincoln Heights Youth Center (2911 N. Altura Street); Lincoln Park (3501 E. Valley Boulevard); Loren Miller Recreation Center (2717 S. Halldale Avenue); Lou Costello Jr. Recreation Center (3141 E. Olympic Boulevard); MacArthur Park (2230 W. 6th Street); Martin Luther King Jr. Park (3934 S. Western Avenue); Montecito Heights Recreation Center (4545 N. Homer Street); Mount Carmel Recreation Center (830 W. 70th Street); MSGR Ramon D. Garcia Recreation Center (1016 S. Fresno Street); Normandie Recreation Center (1550 S. Normandie Avenue); Old Cypress Park Library (3320 E. Pepper Avenue); Pecan Recreation Center (127 S. Pecan Street); Pershing Square (525 S. Olive Street); Queen Anne Recreation Center (1240 South West Boulevard); Rio De Los Angeles State Park (1900 N. San Fernando Road); Ross Snyder Recreation Center (1501 E. 41st Street); Seoul International Park

[136] LARDP Correspondence, Cathie M. Santo, Acting Assistant General Manager, April 14, 2020 and January 11, 2022. (Appendix J)

(3520 San Marino Street); Shatto Recreation Center (3191 W. 4th Street); Silverlake Recreation Center and Dog Park (1850 W. Silverlake Boulevard); South LA Sports Activity Center (7020 S. Figueroa Street); South LA Wetlands Park (5413 S. Avalon Boulevard); South Park Recreation Center (345 E. 51st Street); South Seas House Park (2301 W. 24th Street); State Street Recreation Center (716 N. State Street); Sycamore Grove Park (4702-4703 N. Figueroa Street); Toberman Recreation Center (1725 S. Toberman Street); Tommy Lasorda's Field of Dreams (1901 Waterloo Street); Trinity Recreation Center (2415 Trinity Street); Van Ness Recreation Center (5720 2nd Avenue); Vineyard Recreation Center (2942 Vineyard Avenue); Vista Hermosa Soccer Field (1301 W. 1st Street: and Wabash Recreation Center (2765 E. Wabash Avenue).[137]

The LADRP has expansion or renovation plans for some of these park facilities. Current projects include a planned project to construct a new gymnasium at the Boyle Heights Sports Center.[138] In addition, a new park is planned at 1st Street and Broadway, which would include a two-story restaurant building with rooftop access at the northwest corner of the park, trees and green spaces, walking pathways and passive recreational uses, numerous seating areas, new hardscaping and landscaped areas, bicycle parking area, and 16 multi-function canopies to provide shade and lighting throughout the park.[139]

LAMC Section 12.21 G requires that open space be provided with the development of six or more dwelling units. As shown in Table 6-43**,** *Project Open Space Requirements*, the project would be required to include 55,575 square feet of open space.

Open space and amenities for the project's dwelling units[140] would include private balconies, landscaped amenity terraces, and recreational amenities. Table 6-43 identifies the open space requirements for the project, pursuant to LAMC Section 12.21 G. Based on the maximum 319 residential condominium units and 160 TORS units proposed, the project would be required to include 55,575 sf of open space. The project would fulfill this requirement by providing 55,706 sf of open space through a combination of 20,555 sf of common outdoor open space, 19,451 sf of common indoor open space, and 15,700 sf of private balconies – a total of 102 of the 160 TORS units will have a private balcony, and 212 of the 319 residential condominiums will have a private balcony. Indoor amenity spaces would include a gym, a lounge rooms, game rooms, library, and multi-purpose rooms.

On levels 5 and 40, outdoor amenities such as a pool and roof deck would be provided, for a total of 20,555 sf. In addition, the project would be required to include one tree for every four dwelling units, totaling 120 trees. The project proposes to plant 120 trees on the project site. There are six existing street trees surrounding the project: three existing Chines Flame trees along 11th Street

[137] LARDP Correspondence, Cathie M. Santo, Acting Assistant General Manager, April 14, 2020 and January 11, 2022. (Appendix J)

[138] LARDP Correspondence, Cathie M. Santo, Acting Assistant General Manager, April 14, 2020 and January 11, 2022. (Appendix J)

[139] LARDP Correspondence, Cathie M. Santo, Acting Assistant General Manager, April 14, 2020 and January 11, 2022. (Appendix J)

[140] Requirements for open space include TORS units, as these units are subject to LAMC open space requirements as these units, because they include kitchens, are considered "dwelling units," which are subject to open space requirements whereas "guest rooms" are not subject to this requirement.

and three existing Canary Island Pine trees along South Hill Street. The project would remove one Canary Island Pine and would provide two new Canary Island Pine trees along South Hill Street, resulting in a total of seven street trees after completion of the project.

TABLE 6-43. PROJECT OPEN SPACE REQUIREMENTS

Open Space Requirement[s]	Quantity (dwelling units)	Required Open Space (sf per unit)	Total Open Space (sf)
Residential Condominium Units			
Residential housing (Units with fewer than 3 habitable rooms)	68	100	6,800
Residential housing (Units with 3 habitable rooms)	227	125	28,375
Residential Housing (Units with more than 3 habitable rooms)	24	175	4,200
Total residential open space required	**319**		**39,375**
160 TORS Units			
(Units with fewer than 3 habitable rooms)	152	100 sf	15,200
(Units with 3 habitable rooms)	8	125 sf	1,000 sf
Total (TORS units open space required	**160**		**16,200**
Total open space required			**55,575**
Proposed open space			55,706
Total indoor common open space			19,451[b]
Total outdoor common space			20,555
Private balconies			15,700 (levels 6 – 13 for TORS units 5,100 sf) and (levels 14 – 38 for residential units 10,600 sf)

[a] As per LAMC Section 12.03, "For the purpose of applying the open space requirements of Section 12.21 G., a kitchen as defined herein shall not be considered a habitable room."

[b] The project is requesting Director's Determination per LAMC Section 12.21 G.3(a)(2), to allow a 10 percent increase in the qualifying area of recreation rooms (indoor open space) for a maximum 35 percent of the total required usable open space;

As such, the project would be consistent with the requirements of LAMC and provide a variety of amenities for the project residents.

Because of the accessibility of the project's open space and recreation features, and the fact that the facilities would be designed to meet the focused needs of the project residents and guests, it is expected that the majority of the project's recreational demand would take place within the project site. Some residual demand would occur for the use of facilities not provided within the project. The demand for such space would be reduced by the provision of on-site space. Because a large portion of the project includes smaller unit sizes (studio and one-bedroom units), this likely would further reduce the incidence of larger families and the demand for open space facilities.

Residual off-site park use would likely be dispersed to parks serving the project area that would be easily accessible and that have unique features that would be of interest to different residents. In

addition, employees and guests related to the residential and TORS uses on the project site would be able to utilize the open space amenities located on levels 5 and 40, thereby employees and guests persons would be more likely to use the on-site amenities than nearby park uses. It is, thus, anticipated that impacts at any single park location would be minimal and the project contribution to park use would not cause substantial degradation of existing facilities or require a new public park.

LAMC Section 12.33, which implements the City's parkland dedication ordinance enacted under the Quimby Act, provides a formula for satisfying park and recreational uses through land dedication and/or the payment of in-lieu fees. As per Section 12.33, Applicants must meet with the LADRP and Department of City Planning staff and determine appropriate dedication of land and/or payment of in lieu fees.[141] Per the LADRP and Department of City Planning, the recommendation for the project is land dedication or in-lieu payment.[142]

The project proposes to include 55,706 square feet of recreational/amenity spaces, pursuant to LAMC Sec 12.21G. The project's credited open space of 55,706 square feet (approximately 1.27 acres) for 900 people, resulting in a ratio of 1.4 acres/1,000 people. As mentioned earlier, the City of Los Angeles has an overall ratio of 0.84 acre of neighborhood or community parkland per 1,000 residents. The Community Plan, within which the project is located, has a parkland acres-to-population ratio for neighborhood parks of 0.10 acre per 1,000 residents.

The project provides more on-site open space for residents and guests at a greater ratio than the current ratio for parkland within the Central City Community Plan area; the project would provide recreational and open space amenities for residents and guests; the project would also pay required parkland fees pursuant to LAMC Section 12.33 for the residential condominiums; and pursuant to LAMC Section 21.10.3-a.1 the project would pay the Dwelling Unit Construction Tax of $200 per dwelling unit for construction of all of the new residential condominiums. These taxes are placed into a "Park and Recreational Sites and Facilities Fund" to be used exclusively for the acquisition and development of park and recreational sites. If a developer has already paid Quimby fees, as described under Section 12.33 or has dedicated in lieu parkland or recreational facilities, the otherwise required amount may be reduced accordingly.

The finalized project design would be reviewed by the Department of City Planning to determine whether proposed facilities meet the applicable criteria for consideration or additional park land dedication or fees must be paid. Payment of such fees, if required, would provide a means for the project to support the provision of park lands in a way that would avoid potential deterioration of parks serving the project vicinity.

Because the project's demand for park space would be limited, there are park facilities available to serve the project site, and the project per Section 12.33 would provide sufficient facilities or in-lieu fees to avoid adverse impacts to the City's open space facilities the project demand would not

[141] LARDP Correspondence, Cathie M. Santo, Acting Assistant General Manager, April 14, 2020. (Appendix J)

[142] Board of Recreation and Park Commissioners of the City of Los Angeles, August 6, 2020 and January 11, 2022. (Appendix J)

require new, consolidated or expanded facilities and would further avoid deterioration of parks that might be visited by project residents or guests.

Conclusion

The impact would be less than significant and no mitigation measures are required.

e. Other governmental services?

Less Than Significant Impact. A significant impacts to library services would occur if the project would result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for library services. The City of Los Angeles Public Library (LAPL) provides library services to the City of Los Angeles. The LAPL system provides library facilities and services to the project site and the City of Los Angeles. The LAPL consists of the Central Library, eight regional branches, and 64 community branches. The LAPL has a catalog of over 6 million books, audiobooks, periodicals, DVDs and CDs, over 120,000 photographs, as well as maps, posters, bookplates and other collections, and a wide range of downloadable e-Media including e-Books, e-Audiobooks, e-Videos and mp3 music downloads.[143] All branch libraries provide free access to computer workstations that are connected to the LAPL's information network.[144]

LAPL has also expanded its digital access to LAPL members. Specifically, LAPL members have access to thousands of podcasts, audiobooks, media publications, and instructional content online and via smartphone applications.[145] In addition, specially designed websites are provided for children, teens, and Spanish-speaking patrons. The LAPL is a member of the Southern California Library Cooperative. The Southern California Library Cooperative is an association of 40 independent city and special district public libraries in the greater Los Angeles area that shares resources to improve library services to the residents of all participating jurisdictions.[146]

The project site is served by five libraries within two miles of the project: Richard J. Riordan Central Library, Chinatown Branch, Echo Park Branch, Little Tokyo Branch, and Pico Union Branch. Table 6-44**,** *Libraries Facilities Located Within Two Miles of the Project Site*, provides information regarding these libraries, including their distance/direction from the project site, facility size, and population served.[147]

[143] https://www.lapl.org/collections-resources. Accessed August 26, 2021

[144] LAPL, Robyn Myers, Management Analyst, Correspondence June 19, 2020. (Appendix J)

[145] https://www.lapl.org/collections-resources/e-media. Accessed August 26, 2021.

[146] https://socallibraries.org/ Accessed August 26, 2021.

[147] LAPL, Robyn Myers, Management Analyst, Correspondence June 19, 2020. (Appendix J)

TABLE 6-44. LIBRARY FACILITIES LOCATED WITHIN TWO MILES OF THE PROJECT SITE

Library	Distance/ Direction from Project Site[a]	Size in Square Feet	Population Served
Richard J. Riordan Central Library	0.77 mile to the north	538,000	3,951,591
Little Tokyo Branch	1.17 miles to the northeast	12,500	48,889
Pico Union Branch	1.35 miles to the northwest	12,500	34,339
Chinatown Branch	1.77 miles to the northeast	14,500	10,804
Echo Park Branch	1.85 miles to the north	17,543	52,661

[a] Approximate distance/direction from project site in miles is a straight line distance.
Source: LAPL, Robyn Myers, Management Analyst, Correspondence June 19, 2020. Appendix J

The 2007 LAPL Branch Facilities Plan (Facilities Plan) guides the construction of branch libraries and specifies standards for the size and features of branch facilities based on the population served in each community. The Facilities Plan also outlines the required facilities expansion needs of the libraries within the City. Under the Facilities Plan, the service population for a branch library is determined by the size of the facility as set forth in Table 6-45, *LAPL Branch Facilities Plan – Library Building Size Standards*. The Facilities Plan has been implemented with two bond measures: the 1989 Bond Program and the 1998 Bond Program.[148]

TABLE 6-45. LAPL BRANCH FACILITIES PLAN – LIBRARY BUILDING SIZE STANDARDS

Library Type	Population Served	Size of Facility (sf)
Local Branch	< 45,000	12,500
Local Branch	> 45,000	14,500
Regional Branch	Unspecified	≤ 20,000
Central Library	System-Wide	Unspecified
Level at which new Branch Library recommended	90,000	12,500–14,500

Source: Building on Success: Los Angeles Public Library Strategic Plan, 2007–2010, Branch Facilities Plan. http://www.lapl.org/sites/default/files/media/pdf/about/Strategic_Plan.pdf.
sf=square feet

In 1989, City of Los Angeles voters approved Proposition 1, a $53.4 million Branch Library Facilities Bond also known as the 1989 Library Bond Issue. Under Proposition 1, the Facilities Plan proposed to obtain new sites for building, renovating, and expanding libraries that were unable to serve the community sufficiently and/or were damaged by the Whittier earthquake. LAPL also obtained additional funds from the Community Development Block Grant Award of federal funds from the California State Library Proposition 85, as well as from Friends of the Library groups, for a total branch construction program of $108 million. Under the 1989 Bond Program, 29 libraries were built.[149]

On November 3, 1998, Los Angeles voters approved Proposition DD. Proposition DD, also known as the 1998 Library Facilities Bond, authorized $178.3 million in bonds for funding the

[148] Los Angeles Public Library, Strategic Plan, 2007 – 2010, Building on Success; Appendices, VI and VII. http://www.lapl.org/sites/default/files/media/pdf/about/Strategic_Plan.pdf. Accessed June 25, 2020.
[149] Ibid.

construction, renovation, improvement, or expansion of 32 new branch libraries. As a result of effective project management, four additional projects were added to the scope of the overall facilities program. Of the 36 total projects, 18 existing library facilities were replaced with 18 new library facilities on the existing City-owned sites, nine libraries were constructed on newly acquired sites, five new libraries were constructed on acquired sites in communities that previously did not have library services, and with the four additional projects, existing libraries were renovated and expanded. The entire original Facilities Plan has been completed.

In March 2011, the City of Los Angeles approved Measure L to restore LAPL's service hours back to the levels available prior to the 2009/2010 economic downtown. Through Measure L, LAPL would also be able to expand its services, collections and technology. The LAPL Strategic Plan 2015-2020 is a 5-year plan to detail expanded programs and services, referred to as Key Activities within the Plan, offered by LAPL. Key activities identified within the LAPL Strategic Plan include developing a community-based early literacy program; enabling library staff to use digital technologies to encourage early literacy skills; creating interactive learning spaces for children and their parents; expanding the Story Telling And Reading (STAR) program; offering early literacy workshops for parents and caregivers; creating an interactive web portal for parents and caregivers with information about child development; and actively promote the programs and services for young readers.[150]

With the shift in technology from books to computers, the demand for library facilities is changing. As stated above, members of LAPL have access to thousands of podcasts, audiobooks, media publications, and instructional content online and via smartphone applications made available to library patrons. The availability of such resources reduces the demand for physical library space. Recognizing these facts, the Los Angeles Public Library Strategic Plan 2015-2020 places emphasis on the employment of new technology for meeting future needs and includes objectives for increasing digital collections, e-mail circulation and use of mobile apps. This has the result of allowing the LAPL to meet increased population demand aside from the provision of new physical facilities.

With respect to construction, the project's construction workers would come from an existing labor pool whose workers move between construction projects on short-term bases without requiring relocation. Workers traveling to work may stop at a library that is outside of their residential neighborhood. Such library stops would be incidental and typical of workers throughout the region. Such stops would increase library use at one location while reducing it at another. Such variations would occur on a short-term basis. Therefore, there would be no notable increase in library usage at the libraries serving the project site, and no need for the construction of library facilities to accommodate construction population. The nearest library to the project site is the Richard J. Riordan Central Library, located less than one mile from the project site. There are currently no plans of physical improvements involving construction or expansion to any facilities in the project area.[151]

[150] https://www.lapl.org/sites/default/files/media/pdf/about/LAPL_Strategic_Plan_2015-2020.pdf

[151] LAPL, Robyn Myers, Management Analyst, Correspondence June 19, 2020. (Appendix J)

The project would result in a net increase in residential population of approximately 900 residents. There are five libraries within two miles serving the project site as identified in Table 6-45. The closest library is the Richard J. Riordan Central Library located 0.77 mile from project site and thus would be expected to be the primary facility used by project residents. The project site also has close proximity to the Little Tokyo Branch located 1.17 miles from the project site. As identified in Table 6-45, the Richard J. Riordan Central Library has an unspecified facility size criteria and as such could accommodate the library service needs of the project, especially considering that it is the closest library to the project site. While the Little Tokyo Branch is smaller than the facility size criteria, the population served by this library is less than 90,000, which is when according to the LAPL, an additional branch library should be considered for the area.

In addition, the project's residential units would be equipped to receive individual internet service, which would offer residents the opportunity to access the LAPL's online database system that includes podcasts, audiobooks, media publications, and instructional content. The remote availability of such resources reduces the demand for physical library space.

In addition, the project would generate revenue for the City's general fund that could be used for the provision of public services such as library facilities. Measure L, which gradually increases library funding from its current level of 0.0175 percent of assessed property value to 0.0300 percent to keep libraries open longer and improve library services, also provides LAPL with a mechanism to address the needs of additional residents. The above fees and mechanisms would offset any incremental need for funding of capital improvements to maintain adequate library facilities and service, resulting from the project. Furthermore, there are no LAPL plans to add libraries in the area,[152] nor would the project create a demand for a new library.

Conclusion

The impact regarding library services would be less than significant and no mitigation measures are required.

Cumulative Impacts: Public Services

Fire Protection Services

The related projects would cumulatively generate, in conjunction with the project, the need for additional fire protection and emergency medical services from the LAFD. Although there would be cumulative demand on LAFD services, cumulative impacts on fire protection and medical services would be reduced through regulatory compliance and site specific design and safety requirements, similar to the project. All related projects would be subject to review by the LAFD for compliance with Fire Code and Building Code regulations related to emergency response, emergency access, fire flow, and fire safety.

The protection of public safety is the first responsibility of local government, and local officials have an obligation to give priority to the provision of adequate public safety services which are typically financed through the City general funds. Through the City's regular budgeting efforts,

[152] LAPL, Robyn Myers, Management Analyst, Correspondence June 19, 2020. (Appendix J)

LAFD's resource needs would be identified and monies allocated according to the priorities at the time. The project, as well as the related projects, would also generate revenues to the City's General Fund (in the form of property taxes, sales tax revenue, etc.) that could be applied toward the provision of fire services, as deemed appropriate by the City.

Furthermore, project-by-project traffic mitigation, multiple fire station response, and system wide upgrades to improve response times, and other requirements imposed by the LAFD are expected to help support adequate response times. Through the process of compliance, the ability of the LAFD to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be ensured. Due to the fact that there are four LAFD Stations within 1.5 miles of the project site, including Fire Station 10, which is approximately 1,500 feet away from the project site, the project would not make a cumulatively considerable contribution to any cumulative impact related to the construction of new fire facilities.

Conclusion

Based on the above considerations, the project would not result in a cumulatively considerable contribution to a cumulative impact associated with the construction of new fire facilities.

Police Protection Services

The related projects would cumulatively generate, in conjunction with the project, the need for additional police protection services from the LAPD. It is expected that the related projects (particularly those of a larger nature) would be subject to review by the LAPD on a project-by-project basis to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. Many of the related projects would also be expected to provide on-site security, personnel, and/or design features for their residents and patrons per standard development practices for the given uses. In addition, like the project, the related projects would also be expected to provide on-site security, personnel and/or design features for their residents and patrons. Each related project would be subject to the LAPD CPTED goals and policies, and the City of Los Angeles' routine construction permitting process, which includes a review by the LAPD to ensure that sufficient security measures are implemented. Furthermore, as noted by the LAPD, there are no planned improvements to police facilities in the service area of the project site. The LAPD also indicates through written correspondence dated June 23, 2020 and December 15, 2021, that the project individually or combined with other present and future projects would not result in the need for a new or altered police facility.[153]

Furthermore, the protection of public safety is the first responsibility to local government and local officials have an obligation to give priority to the provision of adequate public safety services, which are typically financed through the City's General Funds. Accordingly, the need for additional police protection services as part of an unplanned police station at this time is not an environmental impact that the project is required to mitigate. Through the process of compliance, the ability of the

[153] LAPD communication dated June 23, 2020 (Appendix J)

LAPD to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be ensured.

Conclusion

Based on the above considerations, the project would not make a cumulatively considerable contribution to a cumulative impacts associated with the construction of new police facilities.

Schools

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. Moreover, in looking at projected enrollment, LAUSD identified that no new school construction is planned.[154] Accordingly, in compliance with SB 50, impacts on public schools from related projects would remain less than significant with payment of school impact fees. Furthermore, as the project would also pay school impact fees, the project would not make a cumulatively considerable contribution to this less than significant impact.

Conclusion

The project's contribution to a cumulative impact would not be cumulatively considerable, and the cumulative impact would be less than significant.

Parks

Of the 35 development and transportation projects on the related projects list, 28 include residential components. These 28 related projects with residential components include a total of 9,925 housing units with a corresponding estimated population of 27,989 persons, without taking into account any existing residential units that might be demolished to allow for development of the related projects.

When combined with the project's 319 new units and increase of 900 in population, the total number of new housing units is 10,244 units and the total increase in population would be 28,889.

As with the project, new related residential projects are anticipated to provide on-site open space and recreational amenities to meet the needs of projected residents. In addition, LAMC Section 12.33, which implements the City's parkland dedication ordinance enacted under the Quimby Act, provides a formula for satisfying park and recreational uses through land dedication and/or the payment of in-lieu fees. In addition to the provision of on-site recreational amenities for related residential related projects, the implementation of required parks and recreational fees under the LAMC would allow for land purchase and expansion and improvement of existing facilities including the improvements to nearby new parks such as the planned 1st Street and Broadway Park and the Ord and Yale Street Park. As such, related projects are not anticipated to result in substantial physical deterioration or accelerated deterioration of recreational and parks facilities.

As described above, the project would include approximately 55,706 of open space. These open space areas include common indoor open space, common outdoor open space, and private

[154] LAUSD Correspondence, Vincent Maffei, Interim Director, Facilities Services Division. July 24, 2020. (Appendix J)

balconies. Indoor residential amenity spaces would include a gym, a health spa, a lounge room, clubhouse, a combined dining/lounge function room, changing rooms, and lobby areas.

The project would comply with LAMC Section 12.33 whereby in-lieu park fees must be paid, as the project would not dedicate any parkland. With fulfillment of the required provisions of the LAMC, the impact would be less than significant.

Conclusion

The project's contribution to a cumulative impact would not be cumulatively considerable, and the cumulative impact would be less than significant.

Cumulative Other Governmental Services

With respect to libraries, each related project would also generate revenues to the City's General Fund (in the form of property taxes, sales tax, business tax, transient occupancy tax, etc.) that could be applied toward the provision of enhanced library services in the Central City Community Plan Area, as deemed appropriate. Furthermore, the Central Library, with its unspecified criteria, could serve the related projects within the Downtown area adequately. Moreover, the LAPL has no current or proposed plan for a new library in the area.[155] As the City has no current or proposed plans for a new library in the area, the related projects would not require or cause the need for new library facilities. Nevertheless, the City's General Plan revenues would help offset the increase in demand for library services and support the provision of services within the existing facilities.

Conclusion

Based on the above considerations, the project would not make a cumulatively considerable contribution to a cumulative impact associated with the construction of new library facilities and the cumulative impact would be less than significant.

[155] LAPL, Robyn Myers, Management Analyst, Correspondence June 19, 2020.

6.16 Recreation

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:					
a.	Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b.	Include recreational facilities or require the construction or expansion of recreational facilities that 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 facility would occur or be accelerated?

Less Than Significant Impact. For the purpose of this SCEA, a significant impact may occur if the project would include substantial employment or population growth, which would 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. The determination of whether the project results in a significant impact on recreation and parks shall be made considering the following factors: (a) the net population increase resulting from the proposed project; (b) the demand for recreation and park services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to recreation and park services (renovation, expansion, or addition) and the project's proportional contribution to the demand; and (c) whether the project includes features that would reduce the demand for park services (e.g., on-site recreation facilities, land dedication, or direct financial support to the Department of Recreation and Parks).

The project would be required to include 55,575 sf of open space. The project would fulfill this requirement by providing 55,706 sf of open space through a combination of 20,555 sf of common outdoor open space, 19,451 sf of common indoor open space, and 15,700 sf of private balconies. The project would provide required open space that exceeds the City's open space requirements.

The availability of these on-site recreation amenities and opportunities would serve to reduce the demand for off-site park services. Notwithstanding the availability of on-site recreational amenities and open space areas, it is reasonable to assume that the future occupants of the project would utilize recreation and park facilities in the surrounding area. As noted above, there are numerous existing, new, and recently improved parks within the project area available to serve the future residents, guests, and retail visitors to the project site.

Accordingly, the project would not substantially 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. In addition, the project Applicant would be responsible for

meeting the parkland dedication or fee requirements pursuant to the Quimby Act and applicable LAMC requirements, as necessary. Therefore, the project's impact upon parks and recreational facilities would be less than significant.

Conclusion

The impact would be less than significant and no mitigation is required.

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

Less Than Significant Impact

A significant impact may occur if a project includes the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment. As noted above, there are numerous existing, new, or recently improved parks within the project area that are available to serve the future residents, guests, and visitors to the project site. The project would be required to include 55,575 sf of open space. The project would fulfill this requirement by providing 55,706 sf of open space through a combination of 20,555 sf of common outdoor open space, 19,451 sf of common indoor open space, and 15,700 sf of private balconies. The project would provide required open space that exceeds the City's open space requirements.

Citywide park standards are Citywide goals and are not intended to be requirements for individual development projects. The Public Recreation Element of the City's General Plan also recognizes that the achievement of such goals is not the responsibility of individual development projects and that such goals will be met by "seek[ing] federal, state and private funds to implement acquisition and development of parks and recreational facilities." The project's increased demands upon recreational facilities would not in and of itself require or result in the construction of a new park, which might have an adverse physical effect on the environment. Thus, impacts to park and recreational facilities would be less than significant..

Conclusion

The impact would be less than significant and no mitigation is required.

Cumulative Impacts: Recreation

Refer to discussion of cumulative impacts related to parks and recreational facilities under Section 6.15, above.

6.17 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 State CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c.	Substantially increase hazards because of a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d.	Result in inadequate emergency access?	☐	☐	☒	☐

This section assesses potential project impacts based on the *1111 S Hill Street Transportation Assessment* (Transportation Assessment or TA) prepared by Fehr & Peers dated August 2020 and the Memorandum: *1111 S Hill Street Revised Project Analysis* (Memorandum), prepared by Fehr & Peers dated July 7, 2021, provided in Appendix K of this SCEA. On December 29, 2020 the Department of Transportation (DOT) issued an assessment for project and approved the methodology of the VMT analysis for the TA prepared in August 2020. As the original Traffic Assessment dated August 2020 did not include TORS units, Fehr & Peers prepared the Memorandum that evaluated the potential transportation impacts of the proposed project with the inclusion of the TORS units. As established in the memorandum, the change in the project would not result in a different conclusion than the TA. Both analyses are based on LADOT Transportation Assessment Guidelines (TAG) and Appendix G of the CEQA Guidelines from the State of California Governor's Office of Planning and Research. This analysis complies with the City's latest guidelines requiring any development projects that may not be fully entitled prior to July 1, 2020 to be evaluated for transportation impacts in compliance with the State CEQA Guidelines in its implementation of SB 743, which are identified in the TAG. In written correspondence dated December 7, 2021, LADOT concurs with the analysis within the Memorandum that the changes in the project description do not alter the conclusions of the original TA (Appendix K).

The TAG establishes an updated set of guidelines, methods, and impact criteria for CEQA considerations that focus on vehicle miles traveled (VMT), geometric hazards, and policy conflicts. The TAG also established a framework for various non-CEQA analyses including a pedestrian, bicycle, and transit access assessment, a project access, safety, and circulation assessment, and project construction analysis. Each area of analysis is described in the TAG with a discussion of screening criteria, the methodology for analysis, impact criteria, and potential mitigation options. Based on the screening criteria set forth in the TAG, the following issue areas in Table 6-46 were evaluated. The detailed screening analysis is available in Appendix K.

TABLE 6-46. TAG SCREENING CRITERIA ISSUE AREAS

TAG Issue Area	Analysis Required?
CEQA Analyses:	
Conflicts with Plans, Programs, Ordinances, and Policies	Yes
Causing Substantial Additional Vehicle Miles Traveled	Yes
Substantially Inducing Additional Automobile Travel	No
Geometric Design Features	Yes
Non-CEQA Analyses:	
Pedestrian, Bicycle, and Transit Access	Yes
Project Access, Safety, and Circulation	Yes
Project Construction	Yes
Residential Street Cut-Through	No

Traffic data collected as part of the TA (i.e., roadway segment volumes) were used for purposes of calculating applicable mobile-source noise levels and air quality emissions in Sections 6.3, *Air Quality*, and Section 6.13 *Noise*, respectively. These calculations were updated based on additional calculations for TORS units provided in Memorandum: *1111 S Hill Street Revised Project Analysis* (Memorandum), prepared by Fehr & Peers dated July 7, 2021.

Would the project:

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

Less Than Significant.

Threshold T-1 of the TAG states that a project would result in an impact if it conflicts with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities. The City aims to achieve an accessible and sustainable transportation system that meets the needs of all users. The City's adopted transportation-related plans and policies affirm that streets should be safe and convenient for all users of the transportation system, including pedestrians, bicyclists, motorists, public transit riders, disabled persons, senior citizens, children, and movers of commercial goods. Thus, the transportation requirements for proposed developments should be consistent with the City's transportation goals and policies.

Proposed projects shall be analyzed to identify potential conflicts with adopted City plans and policies and if there is a conflict, improvements that prioritize access for and improve the comfort of people walking, bicycling, and riding transit in order to provide safe and convenient streets for all users should be identified. Projects designed to encourage sustainable travel help to reduce VMT.

Screening Criteria

If the project requires a discretionary action, and the answer is "yes" to any of the following questions, further analysis is required to assess whether the project would conflict with adopted City plans, programs, ordinances, or policies that establish the transportation planning framework for all travel modes:

Question 1: Would the project generate a net increase of 250 or more daily vehicle trips?

Response: Yes. The net daily vehicle trips were forecast using the City's VMT Calculator dashboard. The project is estimated by the calculator to produce a total of 2,001 daily vehicle trips and a total daily VMT of 11,674.

Question 2: Is the project proposing to, or required to make any voluntary or required, modifications to the public right-of-way (i.e., street dedications, reconfigurations of curb line, etc.)?

Response: Yes. The project proposes to dedicate two feet of right-of-way along the 11th Street frontage and along the alley to comply with the street classification standards in the Mobility Plan. Because of this, the 11th Street sidewalk would be widened by 3 feet, and the alley would be widened by 2 feet.

Question 3: Is the project on a lot that is 0.5 acre or more in total gross area, or is the project's frontage along a street classified as an Avenue or Boulevard (as designated in the City General Plan), 250 linear feet or more, or is the project's building frontage encompassing an entire block along a street classified as an Avenue or Boulevard by the City's General Plan?

Response: Yes. The project is on an approximately 27,415 square foot lot (pre-dedicated) which is approximately 0.63 acres. Additionally, the project is located along South Hill Street which is a Modified Avenue II in the City's General Plan.

The TAG provides screening questions to determine which plans, policies, and programs apply to the project. Based on these questions, the following apply to the project: the Los Angeles Mobility Plan 2035, Central City Community Plan, land use element, Vision Zero Los Angeles and municipal code sections. The project's potential to conflict with these programs, plans, policies or ordinances, are discussed below. The *1111 S Hill Street Transportation Assessment* prepared by Fehr & Peers dated August 2020 and provided in Appendix K of this SCEA contains a detailed review of consistency with these relevant plans and policies.

City of Los Angeles Mobility Plan 2035: The City of Los Angeles Mobility Element guides the operations and design of streets and other public rights of way. It lays out a vision for designing safer, more vibrant streets, that are accessible to people; no matter how they travel. The project's proposed land use and operations design features were reviewed and compared to existing and future conditions resulting from the project, including site access, high injury network identification, pedestrian, bicycle and transit accessibility and loading. For example, the project site is part of a Pedestrian Enhanced District along Hill Street, and the project would improve pedestrian infrastructure on 11th Street as well, with addition of new sidewalks at the project frontage on both

streets. Additionally, the project would remove an existing curb cut along 11th Street; further improving the pedestrian infrastructure and would provide improved Americans with Disabilities Act-compliant sidewalks along 11th Street and Hill Street. The project would support multi-modal travel with bike amenities, such as short-term outdoor bike racks on the sidewalk outside of the path of pedestrian travel, long-term bike parking on the site, and a self-service bike repair area on site.

The project is in substantial conformance with the Mobility Plan. With respect to Policy PL.1, which states "Driveway Access. Require driveway access to buildings from non-arterial streets or alleys (where feasible) in order to minimize interference with pedestrian access and vehicular movement," the proposed project is on Hill Street between 11th Street and 12th Street, with existing alley directly west of the project site. With implementation of the project, vehicle access would be provided via a driveway on the alley to the west of the project, which connects to 11th Street, and at a driveway along Hill Street, which is classified as an arterial street. Because 11th Street is one-lane, one-way westbound with direct access to the project site via the alley, it would not be feasible to place the entirety of the project's vehicular access on 11th Street. Vehicular access via Hill Street would allow distribution of the project's vehicular traffic and through access to the alley. As detailed in Section 6.17(c), the Hill Street driveway would have right turn egress only. As such, interference with pedestrian access and vehicular movement would be minimized.

Central City Community Plan. The Central City Community Plan is one of 35 community plans in the City of Los Angeles that establishes the policies and programs that inform the framework for local land use, circulation, and service systems within the selected community plan area. The Central City Community Plan (CCCP) highlights its objective toward further development of the community, particularly as the residential population of the neighborhood grows. The project's proposed use coincides with an effort to expand the visitor options surrounding the Los Angeles Convention Center and Staples Center area, which are approximately 0.5 mile away to the west. It also supports the Central City Community Plan goal of enhancing sidewalks within the area; since the project would repave and improve the sidewalks surrounding the project site.

- **Vision Zero Los Angeles:** Vision Zero Los Angeles strives to eliminate traffic-related deaths in Los Angeles by 2025 through multiple strategies including modifying streets to better serve vulnerable road users. The project meets the goals and objectives set forth in Vision Zero by providing a driveway along the existing alley, although the driveway on Hill Street does replace an existing driveway. The pedestrian points of entry would be provided along Hill Street and 11th Street, and bicycle parking would be provided on site. The project is not located in a Safe Routes to School program area. The project is not located on any streets identified in the High Injury Network, and the project would not conflict with the implementation of future Vision Zero projects in the public right-of-way.

  The project features, location, and design generally support multimodal transportation options and would be consistent with policies, plans, and programs that support alternative transportation, including the Mobility Plan 2035 (except for Policy PL.1 as discussed above) and the Central City Community Plan. The project features are intended to minimize impacts on the public right-of-way and enhance the user experience by

integrating multimodal transportation options. The project would encourage bicycle use to and from the project site by providing long-term and short-term bicycle parking in accordance with the LAMC requirements and in proximity to existing bicycle facilities along 11th Street, Olive Street, Grand Avenue, and Main Street, as well as future planned bicycle facilities within the vicinity of the project along Hill Street at part of the Bicycle Enhanced Network. The project would encourage pedestrian activity because it concentrates mixed-use development near public transit, which provides visitors, and employees access to the site that can be conveniently accessed by walking, biking, or taking transit. The project would also accommodate pedestrian activity with its access locations, which would be designed to City standards to provide adequate sight distance and pedestrian movement controls that would meet the City's requirements to protect pedestrian safety.

Conclusion

Based on the above, the project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. The project is consistent with adopted City plans, programs, ordinances and policies regarding the circulation system. Therefore, no mitigation measures are required.

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

Less Than Significant.

As part of new State CEQA Guidelines, proposed land use projects need to assess whether they cause a substantial VMT impact. The VMT metric is intended to promote the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses. This encourages development that shortens the distance between housing, jobs, and services, increases the availability of affordable housing options in proximity to public transit, offers attractive non-vehicular transportation alternatives, provides strong transportation demand management programs, and promotes walking and bicycling trips.

LADOT developed a VMT Calculator tool to be used to assess the VMT impacts of proposed development projects within the City. The VMT Calculator also assesses the effectiveness of selected transportation demand management (TDM) measures proposed for a project based on available research. Analysis was conducted for the project using the City's VMT analysis procedures and VMT Calculator. This analysis considered the project's proposed land uses.

The City's VMT impact criteria for development projects is specified in the TAG. Per the criteria, a development project would have a potential significant impact if the project meets one or more of the following:

- For residential projects, a development project may have a potential significant impact if it generates household VMT per capita exceeding 15 percent below the existing average household VMT per capita for the Area Planning Commission (APC) area in which the

project is located (see Table 6-47 below). This criterion was used for the multifamily residential component of the project.

- For office projects, a development project may have a potential significant impact if it generates work VMT per employee exceeding 15 percent below the existing average work VMT per employee for the APC in which the project is located.

- Local-serving retail development tends to shorten trips and reduce VMT whereas regional-serving retail development can lead to substitution of longer trips for shorter ones and could increase VMT. Local-serving is defined as retail uses less than 50,000 square feet. The restaurant components of the project are considered to be local serving due to the size of less than 4,000 square feet and those portions of the project are considered to not have a significant VMT impact.

- For other land use types, the VMT impacts are measured based on the office threshold. This was used for the TORS portion of the project

Please see Table 6-47 below for the City's VMT impact criteria. The project site is located in the Central Area Planning Commission (APC) area, which has a daily household VMT per capita threshold of 6.0 and a daily work VMT per employee threshold of 7.6; the lowest daily work VMT per employee threshold and one of the lowest daily household VMT per capita threshold in the City.

TABLE 6-47. CITY OF LOS ANGELES VMT IMPACT CRITERIA (15% BELOW APC AVERAGE)

Area Planning Commission (APC)	Daily Household VMT per Capita	Daily Work VMT per Employee
Central	**6.0**	**7.6**
East Los Angeles	7.2	12.7
Harbor	9.2	12.3
North Valley	9.2	15.0
South Los Angeles	6.0	11.6
South Valley	9.4	11.6
West Los Angeles	7.4	11.1

Source: LADOT TAG, 2019.

Per the City's procedures, work VMT per employee was estimated using the City's VMT Calculator tool for the proposed project land use. The VMT Calculator was calibrated based on local count data collected in the City of Los Angeles. The VMT Calculator allows for the selection of a wide variety of potential land uses including the multi-family housing, TORS, and restaurant uses proposed as part of the project.

Daily vehicle trips, daily VMT, and daily work VMT per employee for the project was estimated using the City's VMT Calculator tool. For mixed-use projects, according to the TAG, the project VMT impact should be considered significant if any one (or all) of the project land uses exceed the

impact criteria for that particular land use, taking credit for internal capture. In such cases, mitigation options that reduce the VMT generated by an or all of the land uses could be considered.

VMT Analysis

Table 6-48 presents the City's VMT Calculator output as analyzed for the project Transportation Assessment dated August 2020. The project is estimated by the Calculator to produce a total of 2,001 daily vehicle trips and a total daily VMT of 11,674. The daily household VMT per capita is estimated at 3.7, below the threshold of 6.0 for the Central APC. Thus, the project is not projected to have a significant impact on household VMT per capita as estimated by the VMT Calculator. In addition, the daily work VMT per employee is estimated at 7.3, below the threshold of 7.6 for the Central APC. Thus, the project is not projected to have a significant impact on work VMT per employee as estimated by the VMT Calculator. Since the restaurant component of the project is less than 50,000 square feet, it is considered to be local serving and would not generate a significant VMT impact.

As documented in the Memorandum dated July 7, 2021 (Appendix K), the City's VMT calculator does not have a vehicle trip rate for a TORS (extended stay hotel) land use. Given this, one way to estimate the effect of the TORS units was to add 160 multi-family housing units to the VMT calculator, to account for the more residential-type trip behavior that may be expected from guests of an extended-stay hotel. The test concluded that adding residential units to the VMT calculator would not affect the Household VMT per capita metric, since increasing the number of people staying at the project would increase the VMT proportionally and results in the same per capita outcome.

Additionally, the extra 160 "household units" results in a decrease of Work VMT per Employee from 7.3 to 7.1, potentially because it is assumed that some of the residents of the additional 160 "units" may work at the extended stay hotel and restaurant and result in fewer employee vehicle trips to the project. Because these additional household units are to operate as extended-stay hotel rooms and are unlikely to result in new residents who work on the property, the tested Work VMT per Employee result would be an underestimate, so it was determined that original VMT per Employee contained in the Transportation Assessment dated August 2020 would be more representative of the project. Therefore, the project with the inclusion of the TORS units would not result in a significant VMT impact. Therefore, with the inclusion of the TORS units, the project would not result in a different conclusion to the original Transportation Assessment submitted to LADOT in August 2020 and impacts would remain less than significant.

TABLE 6-48. VMT CALCULATOR OUTPUTS

Daily Vehicle Trips	2,001
Daily VMT	11,674
Household VMT per Capita Threshold – Central APC	6.0
Project Household VMT per Capita	3.7
Significant VMT Impact?	No
Work VMT per Employee Threshold – Central APC	7.6
Project Work VMT per Employee	7.3
Significant VMT Impact?	No

Cumulative VMT

As noted above, the project is not projected to have a significant impact on office or retail VMT. Furthermore, given its location in the dense South Park area of the City of Los Angeles served by public transit, the mixed-use nature of the project, and its provision of features to encourage walking and bicycling, the project would be consistent with the applicable goals and objectives of the SCAG 2020-2045 RTP/SCS to locate jobs and housing in infill locations served by public transportation and facilitating active transportation and TDM. Therefore, the project's cumulative impact on VMT would not be cumulatively considerable and there would be a less than significant cumulative impact.

Transportation Demand Management Plan

A TDM program consists of strategies that are aimed at discouraging single-occupancy vehicle trips and encouraging alternative modes of transportation, such as carpooling, taking transit, walking, and biking. Strategies included in a typical TDM program address a wide range of transportation factors, including parking, transit, commute trips, shared mobility, bicycle infrastructure, site design, education and encouragement, and management. Given that the project is not projected to have a significant impact on VMT, the project does not propose a TDM plan as a mitigation measure. However, the project proposes to reduce parking by approximately 20 percent from otherwise applicable LAMC requirements and the project's location and provision of short-term and long-term on-site bicycle parking contribute to encouraging alternative modes of transportation.

Conclusion

This impact would be less than significant.

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. As further detailed below, based on the project site plan review and design assumptions, the project does not present any geometric design hazards related to traffic movement, mobility, or pedestrian accessibility, and no significant impact would occur.

The project would have the following two driveways providing site access:

- Hill Street: The project would include a full-access inbound driveway with right turn out only onto Hill Street near the southeast corner of the site.

- Alley: The existing alley would be converted to two-way for the portion directly adjacent to the project site. This would allow vehicles to enter the alley from 11th Street and drive along it until they turn left into the project site, and allow vehicles to exit the project from the alley, turning right to drive along the alley to connect with 11th Street.

Both driveways would provide full access to the subterranean and above grade parking. Pedestrian access to the residential units would be on Hill Street and pedestrian access to the TORS units

would be on 11th Street, with restaurant entrances on both streets. Visitors, patrons, and employees arriving to the project by bicycle would have the same access opportunities as pedestrians and would be able to utilize on-site bicycle parking facilities. A vehicle loading area would be located on the ground floor near the alley driveway. A passenger loading zone would be located off of 11th Street in front of the project.

Vehicles

As mentioned earlier, the project site has an existing driveway on Hill Street, and the project's new driveway would be reconstructed in a similar location, so it is not introducing a new hazardous design feature. Also, the existing curb cut on 11th Street would be removed, resulting in an overall reduction of driveway curb cuts along the project frontage. However, the proposed interior circulation would allow full access from either driveway, so vehicles choosing to enter from the alley would not be limited. Additionally, left turns out of the Hill Street driveway would be prohibited, to prevent conflicts near the 11th Street/Hill Street intersection and discourage drivers from having to cross two lanes of traffic near an active bus stop in addition to the sidewalk when exiting the site. The loading areas for the project would be located on the ground floor level, with a loading area set aside adjacent to the alley.

The existing alley, runs directly west of the project, beginning at an intersection with 11th Street and primarily running south until it turns west to intersect with Olive Street before it reaches 12th Street. The alley would be converted to two-way for the portion directly adjacent to the project site allowing vehicles to enter the alley from 11th Street and drive along it until vehicles turn left into the project site, and allow vehicles to exit the project from the alley, turning right to drive along the alley to connect with 11th Street. Any vehicles that mistakenly enter the alley from 11th Street would either be able to drive through the project site and exit out of the Hill Street driveway.

The driveways would be designed to comply with LADOT standards. The driveways would not require the removal or relocation of existing passenger transit stops and would be designed and configured to avoid or minimize potential conflicts with transit services and pedestrian traffic. Neither of the driveways would be along streets in the City of Los Angeles' High Injury Network.

Pedestrians and Bicycles

Pedestrian access to the project site would be provided via sidewalks around the perimeter of the project site. Visitors, patrons, and employees arriving to the project site by bicycle would have the same access opportunities as pedestrians and would be able to utilize on-site bicycle parking facilities. The project's access locations would be designed to the City standards and would provide adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls that meet the City's requirements to protect pedestrian safety. Pedestrian and bicyclist entrances to the project site would be provided along Hill Street and 11th Street. While 11th Street at the border of the project site includes a bike lane; neither of the two driveways serving the project site would introduce direct access to the bike lane and vehicles entering or exiting the alley to or from 11th street would not cross the lane as it is on the opposite side of the street. Street trees and other potential impediments to adequate driver and pedestrian visibility would be minimal. Pedestrian

entrances separated from vehicular driveways would provide access from the adjacent streets, parking facilities, and transit stops.

As a result, the project would not substantially increase hazards, conflicts, to pedestrians, bicyclists and vehicles. and would contribute to overall walkability and bike-ability through enhancements to the project site.

Conclusion

Impacts would be less than significant.

d. Result in inadequate emergency access?

Less Than Significant

Construction

Vehicle Access

Construction activity would add traffic to the local and regional transportation systems through the hauling of excavated materials and debris, the transport of construction equipment, the delivery of construction materials, and travel by construction workers to and from the project site.

At the project site, Hill Street currently consists of two northbound and two southbound lanes. For the full duration of construction, approximately 32 months, the rightmost southbound lane on Hill Street would be closed, and both northbound lanes would remain open. The nearest emergency service station is LAFD Station 10 located very close to the project site (0.3 mile) at 1335 South Olive Street. As there would still remain at least one travel lane in each direction on Hill Street, this would not prevent LAFD vehicles or other emergency services or vehicles from traveling past the project site along Hill Street.

11th Street includes one westbound lane and a buffered bike lane on the right side of the street. For the full duration of construction, the existing vehicle travel lane would remain open, but the four parking spots adjacent to the project site, which are currently not metered, would be closed. The bicycle lane may be converted to a shared Class III lane with the vehicles using "sharrows" for the duration of construction at the project site, to be confirmed when final plans are developed with LADOT. As is the case under existing conditions, emergency department vehicles traveling to or from the stations on Olive Street would still have access to one westbound lane on 11th Street, as would other emergency services using the street. The alley adjacent to the project site would be closed for the duration of construction, pending approval from the City of Los Angeles. With the alley closure, access to destinations along the alley would still be provided from the Olive Street end.

There may be intermittent periods when large numbers of material deliveries are required, such as when concrete trucks would be needed for the parking garage and the buildings. Some of the materials and equipment could require the use of large trucks (18-wheelers). Worksite traffic control plans would be prepared for any temporary vehicle lane, parking lane, or sidewalk closures in accordance with applicable City and Manual on Uniform Traffic Control Devices guidelines.

During construction, the project may experience a continuous concrete pour, which would also be addressed in the worksite traffic control plans.

As part of the project, a detailed Construction Management Plan, included as PDF TRAF-1, would be implemented to minimize construction impacts for vehicles, bicyclist and pedestrians. The Construction Management Plan would include measures such as off-site truck staging; scheduling deliveries and pick-ups of construction materials during non-peak travel periods; a worksite traffic control plan; use of flag men to reroute traffic around any closures; establishment of requirements for loading/unloading and storage of materials to ensure that access would remain unobstructed for land uses in proximity to the project site; and coordination with the City and emergency service providers to ensure adequate access is maintained to the project site and adjacent uses. The Construction Management Plan would be prepared and submitted to the City for review and approval. The Construction Management Plan would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community and avoid congestion. Implementation of the Construction Management Plan would ensure that vehicle and emergency vehicle access would be maintained throughout the course of construction activities.

Pedestrian Access

The existing land uses near the vicinity of the construction site would remain open throughout construction and pedestrian and vehicular access to properties located nearby to the project site would be open for the duration of construction. The sidewalks at the project frontages along Hill Street and 11th Street would be closed for the duration of construction, but pedestrian access would be provided via a covered pedestrian canopy and walkway along those two project frontages. While the covered walkway is constructed, utility connections are made, or select other construction procedures are performed, there may be temporary closure of pedestrian access along either of the project frontages. However, during this time, appropriate signage would be implemented to direct pedestrians to accessible nearby routes. As described earlier, the project would implement a detailed Construction Management Plan, included as PDF TRAF-1. The Construction Management Plan would include measures to reduce any impacts to emergency access for pedestrians, such as a worksite traffic control plan; use of flag men to reroute traffic around any closures; establishment of requirements for loading/unloading and storage of materials to ensure that pedestrian access would remain unobstructed for land uses in proximity to the project site. Implementation of the Construction Management Plan would ensure that pedestrian access would be maintained throughout the course of construction activities

Summary of Construction Impacts

Compliance with existing regulations, and implementation of PDF TRAF-1 would ensure that traffic flow and access would be maintained throughout the course of construction and would not result in inadequate emergency access to the project. Impacts would be less than significant and no mitigation is required.

Project Design Feature

PDF TRAF-1: The Applicant shall prepare a detailed Construction Management Plan that shall include, but not be limited to, the following elements, as appropriate:

- Provide off-site truck staging in a legal area furnished by the construction truck contractor.
- Schedule deliveries and pick-ups of construction materials during non-peak travel periods to the extent possible and coordinate to reduce the potential of trucks waiting to load or unload for protracted periods.
- As parking, travel lane, and/or sidewalk closures are anticipated, worksite traffic control plan(s), approved by the City of Los Angeles, should be implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures.
- Determine with the City the number and location of flag men required to reroute traffic and accommodate deliveries as needed.
- Establish requirements for loading/unloading and storage of materials on the project site, where parking spaces would be encumbered, length of time traffic travel lanes can be encumbered, sidewalk closings or pedestrian diversions to ensure the safety of the pedestrian and access to local businesses and residences.
- Ensure that access will remain unobstructed for land uses in proximity to the project site during project construction.
- Coordinate with the City and emergency service providers to ensure adequate access is maintained to the project site and neighboring businesses, residences, and other ongoing projects such as the downtown LA Streetcar.
- Construction notices/hotline will be posted at several locations on the project site.

Operation

Project operation would generate traffic in the project vicinity and increase traffic within the area. However, emergency access to the project site and surrounding area would continue to be provided on adjacent streets similar to existing conditions. There are no roadways bordering the project site designated as an emergency or disaster route by the City; the closest such routes are Olympic Boulevard located one block to the north and Broadway located one block to the east.[156] Direct vehicular access to the project site would be provided via two access driveways. One driveway would be on Hill Street, near the south end of the project site, and the other driveway would be on the alley on the west end of the site, providing access to 11th Street. A loading area would be provided off the alleyway. Project access would be designed to LADOT standards and reviewed by City staff. In addition, the project is required to meet LAMC code requirements for adequate emergency access and comply with LAFD access requirements. The project would comply with LAFD requirements inclusive of standards regarding fire lane widths and weight capacities needed to support fire fighting vehicles, markings and on-site vehicle restrictions to ensure safe access.

[156] City of Los Angeles, Department of City Planning, Safety Element of the Los Angeles City General Plan, adopted November 26, 1996, Exhibit H – Critical Facilities & Lifeline Systems, http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf.

LAFD approval of plot plans showing fire hydrants and access for the project would be required prior to the recording of the final map. LAFD approval of definitive plans and specifications, and any associated permits, would be required prior to commencement of any portion of the project. Prior to the occupancy of the project, LAPD would be provided with a diagram of the property, including access routes, and additional information to facilitate potential LAPD responses (see PDF-PS-2).

No policy or procedural changes to an existing emergency response plan or evacuation plan would be required due to operation of the project. Furthermore, during an unanticipated disaster event, City agencies (i.e., Police and Fire Departments) would implement operational protocols, as well as plans and programs, on a case by-case basis to facilitate emergency evacuations and/or response, which would consider traffic conditions at the time of the emergency. In such instances, traffic would be routed along the City's disaster routes, as determined appropriate, by the applicable responding City agencies.

Conclusion

Compliance with existing regulations, incorporation of PDF TRAF-1, PDF-PS-2, and approval of project site access and circulation plans by the City, including the LAFD, would ensure that implementation of the project operations would not result in inadequate emergency access to the project. Impacts would be less than significant and no mitigation is required.

Cumulative Impacts: Transportation

In the project study area, there are a variety of planned infrastructure improvements:

Transit Service Improvements

- LA Metro NextGen Bus Plan proposes to redesign the bus network of the largest transit provider in Los Angeles County, which has many routes that run in the project area and stop in front of the project on Hill Street. This redesign seeks to increase the frequency of bus lines to allow for easier transfers and faster travel times. Although the draft report was released in February 2020, the finalized plan has not been announced at the time of this study.

- The Los Angeles Streetcar project's proposed route will be along Broadway and 11th Street near the project site. The full one-way route would travel southbound on Broadway from 1st Street to 11th Street, west to Figueroa Street, north to 7th Street, east to Hill Street, north to 1st Street, and east one block to close the loop at 1st Street & Broadway. The Los Angeles Streetcar would include a station at 11th Street and Olive Street, and the single westbound lane on 11th Street would become a shared lane for passenger vehicles and the Streetcar, per the EIR released for the project in 2016. The Los Angeles Streetcar EIR expressed that the bike lane on 11th Street would not be eliminated to the extent that is possible. As the project is not currently funded for construction, volume changes as a result of this project were not included in the cumulative analysis.

Planned Bicycled Facilities

The following bike facility is proposed:

- Planned Tier 2 facilities include Hill Street and Pico Boulevard east of Hope Street.

Related Projects

Figure 2-10 is an area map showing the location of the proposed project and related land use development projects under the cumulative conditions. Table 2-4 shows the list of related projects and their corresponding land uses.

In addition to potential project-specific impacts, the TAG requires that the project be reviewed in combination with nearby related projects to determine if there may be a cumulatively significant impact resulting from inconsistency with a particular program, plan, policy, or ordinance. Per the TAG, a project could have a significant cumulative impact on VMT if the project has both a significant project-level impact as determined above and is not consistent with the SCAG RTP/SCS in terms of development location, density, and intensity.

According to the TAG,[157] for projects that do not demonstrate a project impact by applying an efficiency-based impact threshold (i.e., VMT per capita or VMT per employee) in the project impact analysis, a less-than-significant project impact conclusion is sufficient in demonstrating there is no cumulative VMT impact. Projects that fall under the City's efficiency-based impact thresholds are already shown to align with the long-term VMT and GHG reduction goals of the SCAG RTP/SCS. As noted earlier, the project is not projected to have a significant impact on office or retail VMT. Furthermore, given its location in the dense South Park area of the City of Los Angeles served by public transit, the mixed-use nature of the project, and its provision of features to encourage walking and bicycling, the project would be consistent with the applicable goals and objectives of the SCAG 2020-2045 RTP/SCS) to locate jobs and housing in infill locations served by public transportation and facilitating active transportation and TDM. Therefore, the project would not make a cumulatively considerable contribution to a cumulative impact, and the cumulative impact on VMT would be less than significant.

In addition, the project is located within a TPA as defined by the City and an HQTA as defined by the RTP/SCS. The project's specific location in close proximity to high-quality transit and other off-site retail, restaurant, commercial, and residential areas, along with its highly walkable environment, support the conclusion that the project would achieve a VMT reduction greater than the average for the area, as concluded in the project VMT analysis provided above.

With regard to design hazards, the project would not result in a significant impact. Each related project would be reviewed by the City to ensure compliance with the City's requirements relative to the provision of safe access for vehicles, pedestrian, and bicyclists, which would incorporate standards for adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls to protect pedestrian and enhance bicycle safety. Furthermore, since modifications to access and

[157] 1111 S Hill Street Transportation Assessment prepared by Fehr & Peers dated August 2020

circulation plans are largely confined to a project site and immediate surrounding area, a combination of impacts with other related projects that could potentially lead to cumulative impacts is not expected. Therefore, the project's contribution to a cumulative impact associated with hazardous design conditions would not be considerable.

Also, with regards to emergency access, the project would not result in a significant impact. The project site and the surrounding area are located in an established urban area with a surrounding roadway network that includes multiple routes in the area that are available for emergency vehicles and evacuation. Drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic.

As with the project, related projects would be reviewed by the LAFD and LADOT to ensure compliance with the City's requirements relative to the provision of emergency access. Furthermore, since modification to emergency access and circulation plans are largely confined to a project site and immediate surrounding area, a combination of impacts with other related projects that could potentially lead to a cumulative impact is not expected. Therefore, the project's contribution to cumulative emergency access impacts would not be considerable. Based on the above, the project's contribution to cumulative transportation impacts would not be cumulatively considerable, and cumulative impacts would be less than significant.

Each related project would be required to comply with City requirements regarding haul routes and would implement mitigation measures and/or include project characteristics, such as traffic controls and safety procedures, as part of a Construction Management Plan, to reduce potential traffic impacts during construction. Also, pursuant to California Vehicle Code Section 21806, emergency vehicles are generally able to avoid traffic congestion in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic.

Therefore, the project would not make a cumulatively considerable contribution to a cumulative impact on emergency access, and the cumulative impact would be less than significant.

Conclusion

Cumulative traffic and transit impacts would be less than significant.

6.18 Tribal Cultural Resources

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

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

a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?

Less Than Significant Impact. As discussed under Section 6.5.b. of this document, the project site and immediately surrounding area do not contain any known archaeological sites. In addition, a Sacred Lands File search was requested from NAHC on April 14, 2020. NAHC responded that the Sacred Lands File yielded negative results for TCRs. In addition, the SCCIC record search results that were received on May 27, 2020 did not produce any resources that were 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).

Conclusion

The impact would be less than significant and no mitigation is required.

b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less Than Significant Impact. The project area is heavily urbanized and developed with various urban uses; therefore, the potential to encounter intact Tribal Cultural Resources (TCR)s is very low. The site has had previous ground disturbance occur. Based on previous ground disturbance and the lack of positive results for TCRs, the project would not be expected to result in significant impacts on TCRs related to a substantial adverse change in the significance of a TCR.

Per PRC Section 21074, in the event that cultural artifacts that may be TCRs are discovered during any ground-disturbance activities, the Applicant shall immediately stop all ground disturbance activities and contact the following: (1) the Department of City Planning at (213) 978-1177; and (2) all California Native American tribes that have informed the City they are culturally affiliated with the geographic area of the proposed project.

Pursuant to Public Resources Code Section 21074(a)(2), if the City determines that the item or artifact appears to be TRC, it shall provide any affected tribe a reasonable period of time (not less than 14 days) to conduct a site visit and make recommendations to the Applicant and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and the final disposition of any discovered tribal cultural resources.

Conclusion

The impact would be less than significant and no mitigation is required.

Cumulative Impacts: Tribal Cultural Resources

Impacts related to TCRs tend to be site-specific and are assessed on a site-by-site basis. Many of the cumulative projects identified would require redevelopment of properties in urban areas that are currently developed and have been previously disturbed, and the potential to encounter and cause a significant impact on TCRs is diminished. The City would require the applicants of each of the related projects to assess, determine, and mitigate any potential impacts related to TCRs that could occur as a result of development, as necessary. As discussed previously, through compliance with existing laws and the City's conditions of approval, project impacts associated with TCRs would be less than significant. However, the occurrence of these impacts would be limited to the project site and would not contribute to any potentially significant cultural resources impacts that could occur at the sites of the related projects. As such, the project would not make any cumulatively considerable contribution to any potential cumulative impact related to TCRs.

Conclusion

The cumulative impact related to TCRs would be less than significant.

6.19 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, stormwater 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 that 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?	☐	☐	☒	☐

The following impact analysis pertaining to utilities and service systems includes information contained in the *1111 Hill Street Project Utilities Technical Memorandum*, August 26, 2021, prepared by Psomas and the *1111 S. Hill Street Project Water Resources Technical Report, June 26, 2021* prepared by Psomas. These are included in Appendix G and L of this SCEA.

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 telecommunication facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact.

Water

The facilities required to serve the project site include the large distribution system operated by the LADWP as well local infrastructure to meet the needs of the project site. As discussed under Section 6.19.b, below, LADWP can provide the needed water from its existing system pursuant of the provisions in the City of Los Angeles Urban Water Management Plan (UWMP) 2020. Therefore, LADWP would not require added facilities to meet the demand from the project.

Regarding the local infrastructure, the project would consist of a mixed-use development that includes commercial, TORS units and residential uses. The water infrastructure in the vicinity of the project site includes an existing 12-inch water main in 11th Street, and existing 6-inch and 12-

inch water mains in Hill Street. There are two existing fire hydrants adjacent to the project site. The first hydrant is located on the west side of Hill Street, approximately 43 feet south of the centerline of 11th Street. The second hydrant is located on the west side of Hill Street approximately 312 feet south of the centerline of 11th Street. Due to the existing building being a vacant, unused warehouse, the current water demands are considered negligible.

Construction

Water demand for construction of the project would be required for dust control, cleaning of equipment, excavation/export, removal and re-compaction, etc. During construction, the contractor would bring their own portable bathroom and wash stations which would have their own self-contained water source and wastewater storage. These facilities would not connect to the adjacent sewer or water infrastructure for those uses. Based on a review of construction projects of similar size and duration, a conservative estimate of construction water use would be around 1,000 gallons per day (GPD). Considering that the project demands range from 72,962 GPD to 78,950 GPD without accounting for regulatory water conservation features, and that they have been approved by the LADWP through its water supply assessment review, the temporary water usage is far less than the proposed water demand and therefore poses no significant impacts.

The project would require construction of new, on-site water laterals to serve the new building and facilities of the proposed project. Construction impacts associated with the installation of water lateral lines would primarily involve trenching in order to place the water laterals and meters below surface and would be limited to on-site water distribution, and minor off-site work associated with connections to the public main. Prior to ground disturbance, project contractors would coordinate with LADWP to identify the locations and depth of all lines. During such construction activities, emergency access to the project site as well as existing vehicular and non-vehicular traffic flow would be preserved by the construction management plan approved by the City for the project. Furthermore, the LADWP would be notified in advance of proposed ground disturbance activities to avoid water lines and disruption of water service. Therefore, the project would not require the relocation or construction of new or expanded water facilities related to construction of the project.

Operation

The City calculates the project's anticipated water demand using the City's approved sewer generation rates. The project would include as TORS units, which would have kitchenettes since the rooms are intended for long-term guests. Given the inclusion of kitchenettes and the long-term functionality of the TORS units, two water demand tables have been generated; one table using the City's generation rate for hotel rooms and one table using the City's residential generation rate for units for the TORS units (Tables 6-49 and 6-50).

As shown in Table 6-49, using the City's generation rates for hotel rooms, the project is expected to generate a water demand of 78,950 GPD. Using the City's generation rates for apartment units, the project is expected to generate a water demand of 72,962 GPD (Table 6-50).

TABLE 6-49. ESTIMATED WATER DEMAND TORS AS HOTEL GENERATION RATES

Proposed Use	Proposed Number of Units	Unit	Sewer Generation Factor	Average Daily Flow (GPD) (a)
Residential: Studio	24	DU	75	1,800
Residential: 1-BDRM	144	DU	110	15,840
Residential: 2-BDRM	127	DU	150	19,050
Residential: 3-BDRM	20	DU	190	3,800
Residential: PH	4	DU	190	760
Hotel	160	DU	120	19,200
Pool [(b)]	1	POOL	205	205
Restaurant [(d)]	114	Seats	30 / Seat	3,420
Fitness Center	2,147	SF	0.2	429
Library	3,959	SF	0.05	198
Lounge space	14,762	SF	0.05	738
Landscape Irrigation [(c)]	-	-	-	422
20% Contingency [(e)]	-	-	-	13,088
Total	-	-		78,950

(a) The average daily flow based on City of Los Angeles' sewer generation factors dated April 6, 2012.
(b) A depth of 5' was assumed in order to calculate the GPD of the pool. The average daily pool water use is calculated using the volume of the pool and dividing that by 365, assuming that the pool is refilled once a year for maintenance.
(c) The average daily flow was based on the monthly irrigation demands study performed by RCH. Calculations for the monthly irrigation demands are in the appendix.
(d) The number of seats were calculated per the LA City Plumbing Code as an occupant load.
(e) An additional 20% contingency for overall water use has been included in this water demand table to provide a conservative estimate of water usage.

TABLE 6-50. ESTIMATED WATER DEMAND TORS AS RESIDENTIAL GENERATION RATES

Proposed Use	Proposed Number of Units	Unit	Sewer Generation Factor	Average Daily Flow (GPD) [(a)]
Residential: Studio	24	DU	75	1,800
Residential: 1-BDRM	144	DU	110	15,840
Residential: 2-BDRM	127	DU	150	19,050
Residential: 3-BDRM	20	DU	190	3,800
Residential: PH	4	DU	190	760
Residential Hotel/Apt: Studio	106	DU	75	7,950
Residential Hotel/Apt: 1 BDRM	46	DU	110	5,060
Residential Hotel/Apt: 2 BDRM	8	DU	150	1,200
Pool [(b)]	1	POOL	205	205
Restaurant [(d)]	114	Seats	30 / Seat	3,420
Fitness Center	2,147	SF	0.2	429
Library	3,959	SF	0.05	198
Lounge space	14,762	SF	0.05	738
Landscape Irrigation [(c)]	-	-	-	422

Proposed Use	Proposed Number of Units	Unit	Sewer Generation Factor	Average Daily Flow (GPD) [a]
20% Contingency [e]	-	-	-	12,090
Total	-	-		72,962

(a) The average daily flow based on City of Los Angeles' sewer generation factors dated April 6, 2012.
(b) A depth of 5' was assumed in order to calculate the GPD of the pool. The average daily pool water use is calculated using the volume of the pool and dividing that by 365, assuming that the pool is refilled once a year for maintenance.
(c) The average daily flow was based on the monthly irrigation demands study performed by RCH. Calculations for the monthly irrigation demands are in the appendix.
(d) The number of seats were calculated per the LA City Plumbing Code as an occupant load.
(e) An additional 20% contingency for overall water use has been included in this water demand table to provide a conservative estimate of water usage.

According to the 2017 City of Los Angeles Fire Code Section 501.3, construction documents for proposed fire apparatus access, location of fire lanes, security gates across fire apparatus access roads and construction documents and hydraulic calculations for fire hydrant systems shall be submitted to the fire department for review and approval prior to construction. In addition, Section 507.3 indicates the Fire Flow requirements according to land use. High-density Residential and Neighborhood Commercial requires at least 4,000 gallons per minute (GPM) from four adjacent fire hydrants flowing simultaneously. Industrial and commercial land use require 6,000 to 9,000 from four to six fire hydrants flowing simultaneously. The maximum distance between hydrants should be 300 ft. To serve the project, two new public fire hydrants would be installed for a total of four hydrants ultimately serving the project. An Information of Fire Flow Availability Request (IFFAR) was submitted to LADWP for four hydrants flowing simultaneously at 6,000 GPM on May 7, 2020 to assess the pressures of multiple hydrants flowing simultaneously and to determine if any water main upgrades would be required to meet the LAFD requirements.

LADWP approved the IFFAR on May 20, 2020, which indicates that upgrades to the water mains are not expected. There are currently two hydrants within the vicinity of the project site. There is a hydrant on the west side of Hill Street, 50 feet south of the centerline of 11th Street and a hydrant on the west side of Hill Street, 311 feet south of the centerline of 11th Street. Therefore, two new public fire hydrants would be installed.

In addition, a Service Availability Report (SAR) approved on August 26, 2021 for two proposed fire water connections to the building. The pressure reporting from the SARs indicates that the existing 12 inch water main on 11th Street can provide 51 psi of pressure from a single 5,000 GPM water service connection. It also demonstrates that the existing 12 inch main in South Hill Street also could provide 42 psi of pressure from a 5,000 GPM water service connection if additional water supply was required. These two results demonstrate that the adjacent water infrastructure is sufficient to meet the project's fire water demands.

Therefore, there would be adequate capacity available to accommodate the required fire flows and domestic water demand generated by the project and the project would not require the relocation or construction of new or expanded water facilities.

Conclusion

The impact would be less than significant and no mitigation measures are required.

Wastewater

Less Than Significant Impact. The existing wastewater infrastructure that serves the project site includes an existing 8-inch public sewer main on 11th Street, and a 24-inch sewer main on Hill Street. As the existing warehouse building on the site has been vacant for several years, which indicates that it is unlikely to be producing any existing sewer discharge.

According to the 2019 City of Los Angeles Sewer System Management Plan, three collection systems owned and operated by the City of Los Angeles convey wastewater via approximately 6,439 miles of gravity mains, 33 miles of force mains, and 46 pumping plants. Currently, an average wastewater flow rate of approximately 272 million gallons per day (MGD) is generated in the system. As noted in the City of Los Angeles Sewer System Management Plan, the City's wastewater collection system has sufficient capacity to handle peak dry-weather flows. Beginning in December 2011, increased water conservation has led to significant reductions in wastewater flows conveyed by the City's collection system over the past 10 years[158].

The largest of the City's sewer systems is the Hyperion Sanitary Sewer System, which encompasses the majority of the City. The Hyperion Sanitary Sewer System is a network of approximately 6,043 miles of gravity-fed sewer laterals and mains, pressurized mains, pump stations, treatment plants, and outfalls in the Pacific Ocean.[159] Wastewater generated within the downtown area, including from the project site, is conveyed through the Hyperion Sanitary Sewer System Area. The existing design capacity of the Hyperion Service Area is approximately 550 million gallons per day (consisting of 450 MGD at the Hyperion Water Reclamation Plant, 80 MGD at the Donald C. Tillman Water Reclamation Plant, and 20 MGD at the Los Angeles–Glendale Water Reclamation Plant).[160]

Construction

Construction activities for the project would not result in wastewater generation as construction workers would typically utilize portable restrooms, which would not contribute to wastewater flows to the local wastewater system. Thus, wastewater generation from project construction activities is not anticipated to cause a measurable increase in wastewater flows. Therefore, the project construction impacts to the wastewater system would be less than significant.

The project would require construction of new wastewater infrastructure to serve the new buildings and facilities of the proposed project. Construction impacts associated with wastewater infrastructure would primarily be confined to trenching for miscellaneous utility lines and connections to public infrastructure. Installation of wastewater infrastructure would be limited to on-site wastewater distribution, and minor off-site work associated with connections to the public main.

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[158] City of Los Angeles Department of Public Works, Sewer System Management Plan, January 25, 2019. Accessed July 26, 2021

[159] City of Los Angeles Department of Public Works, Sewer System Management Plan, January 25, 2019. Accessed July 26, 2021

[160] 1111 Hill Street Project Utilities Technical Memorandum, August 26, 2021 prepared by Psomas.

Although no upgrades to the public wastewater main are anticipated, minor off-site work is required to connect to the public main line. Therefore, as part of the project, a construction management plan (PDF-TRAF-1) would be implemented to reduce any temporary pedestrian and traffic impacts during construction, including maintaining lanes of travel and ensuring safe pedestrian access and adequate emergency vehicle access. Should perched groundwater be encountered during construction, it would be directed to a dewatering system and discharged in accordance with all applicable rules and regulations under the NPDES Construction General Permit regulations and the City's grading permit conditions. Overall, when considering impacts resulting from the installation of any required wastewater infrastructure, all impacts are of a relatively short-term duration (i.e., months) and would cease to occur once the installation is complete. Therefore, the project impact on wastewater associated with construction activities would be less than significant.

Operation

As the project would include TORS units that would include kitchenettes, for comparison, two sewer demand tables have been generated: one table using the City's generation rate for hotel rooms and one table using the City's generation rate for apartment units for the TORS units.

Using the City's generation rates for hotel rooms, the project is expected to generate 139,885 GPD in wastewater (Table 6-51). Using the City's generation rates for apartment units, the project is expected to generate 134,895 GPD in wastewater (Table 6-52)

TABLE 6-51. ESTIMATED WASTEWATER TORS AS HOTEL GENERATION RATES

Proposed Use	Proposed Number of Units	Unit	Sewer Generation Factor	Average Daily Flow (GPD) [(a)]
Residential Condo: Studio	24	DU	75	1,800
Residential Condo: 1-BDRM	144	DU	110	15,840
Residential Condo: 2-BDRM	127	DU	150	19,050
Residential Condo: 3-BDRM	20	DU	190	3,800
Residential: PH	4	DU	190	760
Hotel	160	DU	120	19,200
Pool [(b)]	1	POOL	74,650	74,650
Restaurant [(c)]	114	Seats	30	3,420
Fitness Center	2,147	SF	0.2	429
Library	3,959	SF	0.05	198
Lounge space	14,762	SF	0.05	738
Total	-	-		**139,885**

(a) The average daily flow based on City of Los Angeles' sewer generation factors dated April 6, 2012.
(b) A depth of 5' was assumed in order to calculate the GPD of the pool. The maximum daily pool water use is conservatively assumed to be filled in a single day, and is therefore calculated to be the entire volume of the pool, in order to calculate the absolute maximum sewer demands that will be required from the public sewer system.
(c) The number of seats were calculated per the LA City Plumbing Code as an occupant load.

Using the City's generation rates for apartment units, the project is expected to generate 134,895 GPD in wastewater.

TABLE 6-52. ESTIMATED WASTEWATER GENERATION FOR TORS AS RESIDENTIAL UNITS

Proposed Use	Proposed Number of Units	Unit	Sewer Generation Factor	Average Daily Flow (GPD) [(a)]
Residential Condo: Studio	24	DU	75	1,800
Residential Condo: 1-BDRM	144	DU	110	15,840
Residential Condo: 2-BDRM	127	DU	150	19,050
Residential Condo: 3-BDRM	20	DU	190	3,800
Residential: PH	4	DU	190	760
Residential Hotel/Apt: Studio	106	DU	75	7,950
Residential Hotel/Apt: 1 BDRM	46	DU	110	5,060
Residential Hotel/Apt: 2 BDRM	8	DU	150	1,200
Pool	1	POOL	74,650	74,650
Restaurant	114	Seats	30	3,420
Fitness Center	2,147	SF	0.2	429
Library	3,959	SF	0.05	198
Lounge space	14,762	SF	0.05	738
Total	-	-		134,895

(a) The average daily flow based on City of Los Angeles' sewer generation factors dated April 6, 2012.
(b) A depth of 5' was assumed in order to calculate the GPD of the pool. The maximum daily pool water use is conservatively assumed to be filled in a single day, and is therefore calculated to be the entire volume of the pool, in order to calculate the absolute maximum sewer demands that will be required from the public sewer system.
(c) The number of seats were calculated per the LA City Plumbing Code as an occupant load.

A Wastewater Services Information (WWSI) request was submitted to the City of Los Angeles Bureau of Sanitation (BOS) for discharge of 100 percent of the Project's sewer flowing to the 24 inch main line in Hill Street. The WWSI is a review that is performed by the City of Los Angeles Department of Public Works, Bureau of Sanitation to evaluate the existing sewer system and determine if there is adequate capacity to safely convey sewage from proposed development projects, proposed construction projects, proposed groundwater dewatering projects and proposed increases of sewage from existing facilities. The maximum sewer demand for pool use was conservatively calculated using the total volume of the pool. This would ensure that if the entire volume of the pool were to be discharged, the City's public sewer system would be able to handle it. The approved WWSI was received from BOS on July 13, 2021 for the most conservative project demand of 139,885 GPD.

The existing design capacity of the Hyperion Service Area is approximately 550 MGD (consisting of 450 MGD at the Hyperion Water Reclamation Plant, 80 MGD at the Donald C. Tillman Water Reclamation Plant, and 20 MGD at the Los Angeles–Glendale Water Reclamation Plant). The project's most conservative proposed wastewater generation is approximately 139,895 GPD. This is equivalent to far less than one percent of the Hyperion Water Reclamation Plant's capacity where the project's wastewater would be treated. Consequently, impacts on wastewater treatment capacity are less than significant.

The half full capacity of the 24-inch sewer line in Hill Street is 4,790,000 GPD with a current gauging at 20 percent full or 1,920,000 GPD. The project's gross sewage generation, for the most conservative proposed wastewater generation, is approximately 139,885 GPD. This represents

approximately 2.6 percent of the sewer pipe's half full capacity of the 24-inch line in Hill Street and is well below the remaining 30 percent of the pipes half full capacity. Due to this, the impact on wastewater infrastructure would be less than significant.

Conclusion

The impact would be less than significant and no mitigation measures are required.

Stormwater

Less Than Significant Impact. The project site is comprised of approximately 100-percent impervious surfaces under existing conditions. With implementation of the project, the amount of impervious area would not increase.

As discussed in Section 6.10, *Hydrology and Water Quality* above, the project would be designed to comply with the City of Los Angeles's LID design standard. Consistent with LID requirements to reduce the quantity and improve the quality of rainfall runoff that leaves the project site, the project would include the installation of capture and use and/or biofiltration system BMPs as established by the LID Manual. The installed BMP systems would be designed with an internal bypass overflow system to prevent upstream flooding during major storm events.

Drainage structures and improvements within the City are subject to review and approval by the City's Department of Public Works and LADBS. As required by the Department of Public Works, all public storm facilities must be designed in conformity with the standards set forth by Los Angeles County. The Department of Public Works reviews and approves Municipal Separate Storm Sewer Systems plans prior to construction. Any proposed increases in discharge directly into County facilities, or proposed improvements of County-owned Municipal Separate Storm Sewer System facilities, such as catch basins and drainage lines, require approval from County Flood Control to ensure compliance with the County's Municipal NPDES Permit requirements.

Environmental impacts associated with the development of the project, including on-site drainage facilities, have been evaluated throughout this SCEA. As concluded herein, all potentially significant impacts associated with development of the project, including on-site stormwater drainage facilities would be less than significant. Therefore, the project would not require the relocation or construction of new or expanded stormwater facilities.

Conclusion

The impact would be less than significant and no mitigation measures are required.

Electricity

Less Than Significant Impact. Based on the will serve letter dated January 14, 2019, LADWP has indicated it has enough capacity to provide electricity to the project site. LADWP states that the estimated electricity requirement for operation of the project is part of the total load growth forecast for the City and has been considered in the planned growth of the power system.

As discussed in Section 6.6, *Energy*, there would be electrical usage from a variety of sources including electricity associated with the residential, TORS units, and commercial uses on-site, and

off-site water treatment and distribution. Electricity transmission for the Project Site is provided by LADWP which serves approximately 3.8 million people and is the nation's largest municipal electric utility.[161] As discussed in Section 6.6, *Energy*, during operation of the project, the estimated annual consumption of electricity would be approximately 3,425,038 kilowatt-hours (kWh). When compared to the LADWP's projected sales in 2026 of 23,807 GWh per year, the project's electricity demand would represent approximately 0.014 percent of total demand.[162]

This amount is negligible and is within the anticipated service capabilities of LADWP. The estimated power requirements for the project is part of the total load growth forecast for the City of Los Angeles and has been taken into account in the planned growth of the City's power system, as confirmed in the will serve letter from LADWP dated January 14, 2019.[163] As discussed above, the project would be required to comply with energy conservation standards pursuant to Title 24 of the California Code of Regulations. The project would also be required to comply with the City of Los Angeles Green Building Code (L.A. Green Building Code), which incorporates by reference the CALGreen Code. The L.A. Green Building Code, effective January 1, 2017, requires the use of numerous conservation measures, beyond those required by Title 24 of the California Code of Regulations.

The L.A. Green Building Code contains both mandatory and voluntary green building measures to conserve energy. Among many requirements, the L.A. Green Building Code requires energy conservation features. Specifically, the residential units would include energy efficient lighting fixtures, Energy Star-rated appliances, low-flow water features, and energy efficient mechanical heating and ventilation systems. The project would also designate 15 percent of the building's roof area as a zone for solar use. Thus, the project would incorporate energy conservation features. In addition, consistent with Ordinance No. 186,485, the project would install pre-wiring for EV charging spaces for 30 percent of its total parking capacity for future use, with 10 percent of the parking spaces having chargers installed for immediate use by EVs.

Based on the will serve letter dated January 14, 2019, the LADWP has indicated it has enough capacity to provide electricity to the project site. LADWP states that the estimated power requirement for the project is part of the total load growth forecast for the City and has been considered in the planned growth of the power system. Therefore, the project would not necessitate the construction of off-site electrical facilities or infrastructure improvements that would have the potential to cause a significant environmental impact.

Conclusion

The impact would be less than significant and no mitigation measures are required.

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[161] Los Angeles Department of Water & Power (LADWP) (2017), Power Strategic Long-Term Resource Plan. Available at https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=10n2b06q5l_4&_afrLoop=192514895907060. Accessed August 4, 2021.

[162] Electricity and natural gas values provided represent most conservative energy consumption estimates. These values are based on TORS units modeled as a "Hotel" in CalEEMod compared to a residential dwelling

[163] 1111 Hill Street Project Utilities Technical Memorandum. Psomas, August 26, 2021

Natural Gas

Less Than Significant Impact. The existing natural gas service in the vicinity of the project site is supplied by SoCalGas. From record substructure maps, it has been determined that there is one existing 3-inch gas line in 11th Street and a 6-inch gas line in Hill Street.

As discussed in Section 6.6, *Energy*, natural gas for the project site is provided by SoCalGas. According to the 2020 California Gas Report Supplement, the annual gas supply delivered by SoCal Gas in 2019 was 2,409 million cubic feet (MMcf)/day.[164] The demand for total natural gas is expected to decrease at an average annual rate of 0.85 percent per year from 2019 to 2035.[165] This decrease is due to modest economic growth, CPUC-mandated energy efficiency (EE) standards and programs, tighter standards created by revised Title 24 Codes and Standards, renewable electricity goals, the decline in commercial and industrial demand, and conservation savings linked to Advanced Metering Infrastructure (AMI). Thus, with the natural gas consumption As discussed in Section 6.6, *Energy*, the natural gas consumption as a result of the operation of the project would be approximately 6.36 MMcf per year. This natural gas estimate assumes that no more the 50 percent of the dwelling units would have fireplaces installed, in accordance with PDF-GHG-1 (refer to Section 6.8, *Greenhouse Gas Emissions*). Based on their 2020 California Gas Report, the California Energy and Electric Utilities estimate natural gas capacity within SoCalGas' planning area would be approximately 3,435 MMcf per day in 2026 (the project's opening year).[166] Thus, the project's annual natural gas consumption would represent 0.0005 percent of the 2026 forecasted capacity in SoCalGas' planning area. A will serve letter request was sent to SoCalGas. SoCalGas confirmed that it does have gas facilities within the vicinity of the project.

As discussed above, the project would be required to comply with energy conservation standards pursuant to Title 24 of the California Code of Regulations. The project would also be required to comply with the L.A. Green Building Code. The L.A. Green Building Code requires the use of numerous conservation measures, beyond those required by Title 24 of the California Code of Regulations. The L.A. Green Building Code contains both mandatory and voluntary green building measures to conserve energy. Therefore, compliance with Title 24 of the California Code of Regulations and the L.A. Green Building Code would reduce the project's energy consumption. Therefore, the project would not necessitate the construction of off-site natural gas facilities or infrastructure improvements that would have the potential to cause significant environmental impacts and no mitigation measures are required.

[164] California Gas and Electric Utilities, 2020 California Gas Report. Table 32. Available: https://www.socalgas.com/sites/default/files/2020-10/2020_California_Gas_Report_Joint_Utility_Biennial_Comprehensive_Filing.pdf. Accessed: July 19, 2021.

[165] California Gas and Electric Utilities, 2020 California Gas Report. Table 32, Table 34. Available: https://www.socalgas.com/sites/default/files/2020-10/2020_California_Gas_Report_Joint_Utility_Biennial_Comprehensive_Filing.pdf. Accessed: July 19, 2021.

[166] California Gas and Electric Utilities, 2020 California Gas Report. Table 34. Available: https://www.socalgas.com/sites/default/files/2020-10/2020_California_Gas_Report_Joint_Utility_Biennial_Comprehensive_Filing.pdf. Accessed: July 19, 2021.

Conclusion

The impact would be less than significant and no mitigation measures are required.

Telecommunications

Less Than Significant Impact. The existing telecommunications services in the vicinity of the project site are supplied by various utilities providers such as AT&T Distribution, ATT, Spectrum, Verizon, Zayo FNA Abovenet, and Crown Castle. The companies were found through a DigAlert search and were reached out to for a Utilities Request. Spectrum is the only provider to date that has confirmed the existence of utilities that were owned and operated in the project's limits. All other utility providers, except for AT&T Distribution, have confirmed that they do not have utilities present in the project's vicinity. Any street improvement activities conducted as part of the project, would protect the existing conduit in place unless it is required to be removed and replaced by AT&T during the design review process. There are no existing cellular towers located adjacent to the project site and no cellular towers are proposed by the project.

Any new telecommunication connections would be constructed by the private utility service provider and follow all appropriate regulatory requirements of such a connection. New service point connections to provide telecommunications services to the new buildings would be provided in conformance with all applicable federal, state, and county requirements. The project would not result in the relocation or expansion of telecommunication facilities.

Conclusion

The impacts would be less than significant and no mitigation measures are required.

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

Less Than Significant Impact. As stated above, using the City's generation rates for hotel rooms for the TORS units, the project is expected to generate a water demand of 78,950 GPD. Using the City's generation rates for apartment units for the TORS units, the project is expected to generate a water demand of 72,962 GPD without accounting for regulatory water conservation features.

The project would be designed to meet CALGreen and Title 24 Building Standards Code. The project would emphasize water conservation, which would be achieved through the use of energy star appliances, and low-flow plumbing fixtures. With implementation of additional water conservation measures per regulatory requirements, and the project's water conservation features, the project's actual water demand would be less than the amount stated above. Compliance with water conservation measures required by State and City green regulations would reduce this estimated projected water demand.

The Metropolitan Water District's 2020 Regional UWMP addresses the future of Metropolitan Water District's water supplies and demand through the year 2045.

To determine the overall service area reliability, the UWMP included three hydrologic conditions: average year (30- year median hydrology from FY 1985/86 to FY 2014/15); single-dry year (repeat

of the 1989/90 hydrology); and multi-dry year (FY 1987/88 to FY 1991/92 hydrology). As noted in the 2020 UWMP, LADWP does not anticipate water shortages as demands are met by the available supplies under all hydrologic scenarios through 2045. Achieving LADWP's water supply would include multiple strategies to achieve and maintain water use reductions, including: investments in state-of-the-art technology; recycled water; stormwater recapture, installation of water-efficient fixtures and appliances, expansion and enforcement of prohibited water uses, reductions in outdoor water use, extending education and outreach efforts; and encouraging regional conservation efforts. Conservation and water use efficiency are a foundational component of LADWP's water resource planning efforts and will continue to be central to the City's water use efficiency goals over the long term.[167]

In the 2020 Regional UWMP, the projected 2045 water demand for a Single Dry Year is 1,551,000 acre-feet per year (afy), and the capability of current supplies 2,479,500 afy, a potential surplus of 928,500 afy, For multiple dry weather years, (FY 1988-1992 Hydrology scenario), the capability of current water supplies would be 2,239,000 afy; a potential surplus of 648,000 afy.

According to the reliability data in the City of Los Angeles 2020, the most recent plan available, LADWP has sufficient supply to meet a total water demand of 746,000 in acre feet (af), by the year 2045. LADWP has programs to reduce the demand to 565,800 afy by 2045, a difference of 180,200 afy. As noted in the UWMP, the City's water usage today is lower than it was in the 1970s despite an increase in population of over one million people and reflects the success and importance of the City's conservation strategies that include water conservation regulations, ordinances, and behavior changes resulting from customer outreach and educational programs.

The UWMP is based on SCAG growth projections and takes into account all expected regional growth. As indicated in the discussion in Section 6.14, *Population and Housing*, the project's contributions to growth fall within the range of growth accounted for in the SCAG projections that are used for future planning activities and provision of services. The projections are revised at 4-year intervals so as to stay current with current growth trends and changes in land use activity. Changes to planning and zoning designations can be incorporated in a timely fashion so long as the resulting growth does not exceed the growth projections. The UWMP is updated at regular five year cycles and includes programs to meet the supply requirements.

Using the City's generation rates for hotel rooms for the TORS units, the project is expected to generate a water demand of 78,950 GPD. Using the City's generation rates for apartment units for the TORS units, the project is expected to generate a water demand of 72,962 GPD. This translates into 88.4 acre feet/per year (afy) and 81.7 afy respectively, when fully occupied. These figures do not include water for the project's regulatory water conservation features. The project's increase in water demand would fall within the available and projected water supplies reported in the 2020

[167] https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-sourcesofsupply/a-w-sos-uwmpln?_afrLoop=242685679229984&_afrWindowMode=0&_afrWindowId=1b2yajr4zp_1#%40%3F_afrWindowId%3D1b2yajr4zp_1%26_afrLoop%3D242685679229984%26_afrWindowMode%3D0%26_adf.ctrl-state%3D1b2yajr4zp_17. Accessed July 25, 2021.

UWMP for the City for 2045 and would constitute less than 0.01 percent of the City's projected 2040 water supply.

Conclusion

As there would be sufficient water supplies available to serve the project, the impact regarding water supply would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. As stated in Section 6.19.a,. using the City's generation rates for hotel rooms for the TORS units, the project is expected to generate 139,885 GPD in wastewater when operational. Using the City's generation rates for apartment units for the TORS units, the project is expected to generate 134,895 GPD in wastewater.

Given the current capacity of the Hyperion Service Area, the Hyperion Service Area would have ample capacity to serve the project's wastewater generation, and as concluded in the Sewer Capacity Availability Review (SCAR) (Appendix G), the BOS would have adequate capacity to serve the project.

Conclusion

The project would have a less than significant impact with respect to wastewater treatment capacity and no mitigation measures are required.

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

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

In 2019, the total amount of solid waste (including an import amount of 168,639 tons) disposed of at in-county Class III (nonhazardous solid waste) landfills, transformation facilities, and out-of-County landfills was approximately 11 million tons.[168] The remaining disposal capacity for the

[168] County of Los Angeles Department of Public Works, County of Los Angeles Countywide Integrated Waste Management Plan: 2019 Annual Report. September 2020.

County's Class III (nonhazardous solid waste) landfills is estimated at approximately 148.40 million tons as of December 2019, the most recent data available.[169] Waste from the City of Los Angeles is disposed of primarily at the Sunshine Canyon and Chiquita landfill sites. Of the 148 million tons of remaining capacity within the County, 56.99 million tons, or approximately 38 percent, is located at the Chiquita Canyon landfill, which has a remaining life of 28 years. In addition to in-County landfills, out-of-County disposal facilities are also available to the City of Los Angeles.

As discussed in County of Los Angeles Department of Public Works, County of Los Angeles Countywide Integrated Waste Management Plan: 2019 Annual Report, a shortfall in solid waste disposal capacity within the County is not anticipated to occur within the next 15 years under current conditions. The County anticipates that future disposal needs over the next 15 years can be adequately met through increased waste reduction and diversion efforts, development of alternative technologies, exportation of waste to out-of-County facilities, the Waste-by-Rail system to Mesquite Regional Landfill, in Imperial County, and if found to be environmentally sound and technically feasible, the expansion of in-County Class III landfill capacity.[170]

The City's Solid Waste Integrated Resources Plan (SWIRP), most commonly known as the City's Zero Waste Plan, provides a long-term plan through 2030 for the City of Los Angeles's solid waste programs, policies and environmental infrastructure. The SWIRP aims for the City of Los Angeles to achieve a goal of 90 percent diversion by 2025. This targeted diversion rate would be implemented through an enhancement of existing policies and programs such as implementing additional downstream programs (e.g., adding textiles to the blue bin recycling program; adding food scraps to the green bin recycling program; and requiring private solid waste collection service to provide access to multifamily and commercial customers); implementation of mandatory participation programs for residential, government, commercial, industrial, and institutional users; requiring transfer stations and landfills to provide resource recovery centers; and increased diversion requirements at construction and demolition (C&D) facilities pursuant to new policies and programs, and the development of future recycling facilities.[171]

As shown in Table 6-53, the project with the TORS units calculated as hotel uses could generate approximately 237.47 tons/year of solid waste. With the TORS units calculated as a residential use, the project's potential waste generation could be 223.47 tons/year of solid waste. Under both scenarios, the project's waste generation could be accommodated by the County's available regional landfills, and as discussed above, waste generated by the project would be subject to State

[169] County of Los Angeles Department of Public Works, County of Los Angeles Countywide Integrated Waste Management Plan: 2019 Annual Report. September 2020. Appendix E-2. https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=14372&hp=yes&type=PDF

[170] County of Los Angeles Department of Public Works, County of Los Angeles Countywide Integrated Waste Management Plan: 2019 Annual Report. September 2019. https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=14372&hp=yes&type=PDF

[171] Solid Waste Integrated Resources Plan, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-zwswirp?_adf.ctrl-state=and9syb5r_597&_afrLoop=8114843230493593&_afrWindowMode=0&_afrWindowId=null#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D8114843230493593%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dand9syb5r_601 Accessed July 26, 2021.

and local recycling and waste diversion strategies and policies including the City's SWIRP goal of achieving a 90 percent solid waste diversion rate by 2025.

TABLE 6-53. PROJECTED SOLID WASTE GENERATED DURING OPERATION

Land Uses	Quantity	Ton/Unit[a]	Solid Waste Generated (tons/year)
Proposed Land Uses With TORS Units Calculated as Hotel Uses			
Residential	319 du	0.46	146.74
TORS as Hotel	160 rooms	0.5475	87.6
Commercial	3,429 sf	0.000913	3.13
Total			**237.47**
Proposed Land Uses With TORS Calculated as Residential Uses			
Residential	319 du	0.46	146.74
TORS as Residential	160 du	0.46	73.6
Commercial	3,429 sf	0.000913	3.13
		Total	**223.47**

Notes:
du = dwelling unit; lbs = pounds; sf = square feet
[a] Generation factors provided by Source: Emissions modeling by ICF using CalEEMod version 2016.3.2 (Appendix A)..
Source: ICF 2021.

Project construction would include the demolition of approximately 81,993 square feet of the existing warehouse; the export of approximately 58,000 cy of material, including building demolition material and excavated soil; and new construction. These activities would generate demolition-, excavation-, and construction-related waste including, but not limited to, soil, asphalt, wood, paper, glass, plastic, metals, and cardboard that would be disposed of in one of the County's inert debris engineered fill operations that are located throughout Los Angeles County, such as Sunshine Canyon landfill, Chiquita landfill, and Azusa Land Reclamation inert landfill.

C&D materials would be conveyed pursuant to the City's Waste Hauler Permit Program (Ordinance 181519), effective January 1, 2011. Under this Ordinance, all private waste haulers collecting solid waste within the City, including C&D waste, are required to obtain AB 939 Compliance Permits and to transport C&D waste to City certified C&D processing facilities. These facilities process received materials for reuse and have recycling rates that vary from 70 percent to 84 percent.

Furthermore the project would comply with CALGreen code Section 99.04.408, which would ensure that at least 65 percent of the demolition and construction waste generated would be recycled and/or salvaged.. The amount of solid waste generated by the project is within the available capacities of area landfills, and the project's impacts to regional landfill capacity would be less than significant.

Based on the factors discussed above, the project would result in less than significant impacts regarding solid waste and no mitigation measures are required.

Conclusion

Based on the factors discussed above, the project would result in less than significant impacts regarding solid waste and no mitigation measures are required.

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

Less Than Significant Impact. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): (1) source reduction; (2) recycling and composting; and (3) environmentally safe transformation and land disposal. In addition, AB 1327 provided for the development of the California Solid Waste Reuse and Recycling Access Act of 1991, which requires the adoption of an ordinance by any local agency governing the provision of adequate areas for the collection and loading of recyclable materials in development projects.

Furthermore, Assembly Bill 341 (AB 341), which became effective on July 1, 2012, requires businesses and public entities that generate four cubic yards or more of waste per week and multi-family dwellings with five or more units, to recycle. The purpose of AB 341 is to reduce greenhouse gas emissions by diverting commercial solid waste from landfills and expand opportunities for recycling in California. In addition, in March 2006, the Los Angeles City Council adopted RENEW LA, a 20-year plan with the primary goal of shifting from waste disposal to resource recovery within the City, resulting in "zero waste" by 2030. The "blueprint" of the plan builds on the key elements of existing reduction and recycling programs and infrastructure, and combines them with new systems and conversion technologies to achieve resource recovery (without combustion) in the form of traditional recyclables, soil amendments, renewable fuels, chemicals, and energy. The plan also calls for reductions in the quantity and environmental impacts of residue material disposed in landfills. More recently, in October 2014,

Governor Jerry Brown signed AB 1826, requiring businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste generated per week. Specifically, beginning April 1, 2016, businesses that generate eight cubic yards of organic waste per week shall arrange for organic waste recycling services. In addition, beginning January 1, 2017, businesses that generate four cubic yards of organic waste per week shall arrange for organic waste recycling services.

The City's SWIRP, provides a long-term plan through 2030 for the City of Los Angeles's solid waste programs, policies and environmental infrastructure. The SWIRP aims for the City of Los Angeles to achieve a goal of 90 percent diversion by 2025. This targeted diversion rate would be implemented through an enhancement of existing policies and programs such as implementing additional downstream programs (e.g., adding textiles to the blue bin recycling program; adding food scraps to the green bin recycling program; and requiring private solid waste collection service to provide access to multifamily and commercial customers); implementation of mandatory participation programs for residential, government, commercial, industrial, and institutional users; requiring transfer stations and landfills to provide resource recovery centers; and increased

diversion requirements at C&D facilities pursuant to new policies and programs, and the development of future recycling facilities.

Since the project would comply with federal, State, and local statutes and regulations related to solid waste, impacts would be less than significant, and no mitigation measures are required.

Conclusion

Based on the factors discussed above, the project would result in less than significant impacts regarding solid waste and no mitigation measures are required.

Regulatory Compliance Measures

RCM-PU-1. Prior to issuance of grading permits, the Applicant shall submit a Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan to the City of Los Angeles Bureau of Sanitation Watershed Protection Division for review and approval. The Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook.

RCM-PU-2. The project shall comply with Ordinance No. 170,978 (Water Management Ordinance), which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season).

RCM-PU-3. In compliance with LAMC Section 66.32.1, the Project shall incorporate the following:

- Prior to the issuance of any demolition or construction permit, the Applicant shall provide a copy of the receipt or contract from a waste disposal company providing services to the project, specifying recycled waste service(s), to the satisfaction of the Department of Building and Safety. The demolition and construction contractor(s) shall only contract for waste disposal services with a company that recycles demolition and/or construction-related wastes.

- To facilitate on-site separation and recycling of demolition- and construction related wastes, the contractor(s) shall provide temporary waste separation bins on-site during demolition and construction. These bins shall be emptied and the contents recycled accordingly as a part of the project's regular solid waste disposal program.

Cumulative Impacts: Utilities and Service Systems

Water Supply

All of the related projects are subject to City review to assure that the existing public utility facilities would be adequate to meet the domestic water and fire water demands of each project. Developers are required to improve facilities where appropriate and development cannot proceed without

appropriate verification and approval by LADWP and LAFD, with funding by the developers. Required improvements by related projects, if they should occur, would be limited to minor, local improvements. Such improvements require only minor construction with very limited short-term construction impacts on traffic and perhaps noise. As noted above, the project would not require improvements to local mainlines.

LADWP, as a public water service provider, is required to prepare and periodically update an UWMP to plan and provide for water supplies to serve existing and projected demands within its jurisdiction. The UWMP prepared by LADWP is based on the growth projections that are provided in the SCAG RTP/SCS, which is updated on 4-year cycles to account for changes in growth rates, and which accounts for existing development within the City, as well as projected growth anticipated to occur through redevelopment of existing uses and development of new uses. Each of the related projects would need to be consistent with the SCAG RTP/SCS projections in order to be accounted for in LADWP's UWMP current and projected available water demand. As the LADWP's UWMP is based on growth projections in the SCAG RTP/SCS, no significant cumulative water supply impact is anticipated from cumulative development.

As discussed above, the project's net demand on water supplies would fall within the available and projected water supplies projected in LADWP's UWMP. Related projects would be required to provide local connections subject to review for service availability, subject to LADWP water system rules and requirements.

Conclusion

The project's contribution to a cumulative impact on water supply would not be cumulatively considerable and the cumulative impact regarding water supply would be less than significant.

Wastewater

Development of the project in combination with the related projects and other projects within the service area of the Hyperion Service Area would generate additional wastewater. As discussed above, the existing design capacity of the Hyperion Service Area is approximately 550 MGD (consisting of 450 MGD at the Hyperion Water Reclamation Plant, 80 MGD at the Donald C. Tillman Water Reclamation Plant, and 20 MGD at the Los Angeles–Glendale Water Reclamation Plant). Using the City's generation rates for hotel rooms, the project is expected to generate 139,885 GPD in wastewater when operational. Using the City's generation rates for apartment units, the project is expected to generate 134,895 GPD in wastewater when operational. Both scenarios, are equivalent to far less than one percent of the Hyperion Water Reclamation Plant's capacity where the project's wastewater would be treated.

As with the project, all related projects in the City of Los Angeles would be subject to the provisions of the LAMC requiring provision of on-site infrastructure, improvements to address local capacity issues and payment of fees for future sewerage replacement and/or relief improvements. In addition, the potential need for the related projects to upgrade sewer lines to accommodate their wastewater needs is site-specific and there would be minimal, if any, direct cumulative relationship between the development of the project and the related projects.

LAMC Section 64.15 requires that projects perform a SCAR when any development seeks a sewer permit to connect a property to the City's sewer collection system, proposes additional discharge through their existing public sewer connection, or proposes a future sewer connection or future development that is anticipated to generate 10,000 GPD or more of sewage. A SCAR is an analysis of the existing sewer collection system to determine if there is adequate capacity existing in the sewer collection system to safely convey the newly generated sewage to the appropriate sewage treatment plant.

During environmental and entitlement phases the City has determined that an alternative, availability study can be performed which verifies the sewer capacity of the adjacent sewer mains through a process run by the BOS called a WWSI request. This preliminary evaluation reviews potential impacts to the wastewater system for the project in the same manner as the SCAR would. As stated in the WWSI, the evaluation would determine cumulative impacts and guide the planning process for any future sewer improvement projects needed to provide future capacity as the City grows and develops. Any future projects would require coordination with the Los Angeles Bureau of Engineering for sewer availability. That process would involve the Los Angeles Bureau of Engineering to analyze sewer capacity upstream and downstream of the project's point of connection. In addition, the City establishes design criteria for sewer systems to assure that new infrastructure provides sewer capacity and operating characteristics to meet City Standards. Per this Special Order, lateral sewers, which are sewers 18 inches or less in diameter, must be designed for a planning period of 100 years. The Special Order also requires that sewers be designed so that the peak dry weather flow depth during their planning period shall not exceed one-half the pipe diameter.

Per the WWSI conclusions, and given existing and anticipated future capacity at the wastewater treatment facilities, project wastewater generation impacts regarding wastewater facilities would be less than significant and its contribution to cumulative impacts would not be cumulatively considerable

Conclusion

The project's contribution to a cumulative impact would not be cumulatively considerable and the cumulative impact regarding wastewater would be less than significant.

Electricity

As discussed in Section 6.6, *Energy*, during operation of the project, the estimated annual consumption of electricity would be approximately 3,425,038 kilowatt-hours (kWh). When compared to the LADWP's projected sales in 2026 of 23,807 GWh per year, the project's electricity demand would represent approximately 0.014 percent of total demand.[172]

Thus, the project would result in the use of renewable and non-renewable electricity resources on a relatively small scale. Additionally, the project would include energy conservation features, including energy efficient lighting fixtures, Energy Star-rated appliances, low-flow water features,

[172] Electricity and natural gas values provided represent most conservative energy consumption estimates. These values are based on TORS units modeled as a "Hotel" in CalEEMod compared to a residential dwelling

and energy efficient mechanical heating and ventilation systems. The project would also provide a solar zone constituting 15 percent of the project's roof.

As with the project, the other future related projects would also be expected to incorporate energy conservation features, comply with applicable regulations (e.g., anti-idling vehicle regulations during construction), the 2016 Title 24 standards and CALGreen code, the L.A. Green Building Code, and incorporate mitigation measures as necessary. Each of the related projects would be reviewed by LADWP to identify necessary power facilities and service connections to meet their respective needs. Thus, use of electricity resources by cumulative development in the project area would be reduced by conservation features and measures that would be implemented by each individual development project and by state measures requiring LADWP to obtain more of its supplies from renewable resources.

Conclusion

The project's contribution to a cumulative impact with respect to electricity plans as well as infrastructure would not be cumulatively considerable and, thus, would result in a less than significant cumulative impact.

Natural Gas

As discussed in Section 6.6, *Energy*, the natural gas consumption as a result of the operation of the project would be approximately 6.36 MMcf per year. Based on their 2020 California Gas Report, the California Energy and Electric Utilities estimate natural gas capacity within SoCalGas' planning area would be approximately 3,435 MMcf per day in 2026 (the project's opening year).[173] Thus, the project's annual natural gas consumption would represent 0.0005 percent of the 2026 forecasted capacity in SoCalGas' planning area.

Thus, the project would result in the use of natural gas resources on a relatively small scale. As discussed above, the project would be required to comply with energy conservation standards pursuant to Title 24 of the California Code of Regulations. The project would also be required to comply with the L.A. Green Building Code, which has been effective as of January 1, 2017. The L.A. Green Building Code requires the use of numerous conservation measures, beyond those required by Title 24 of the California Code of Regulations. The L.A. Green Building Code contains both mandatory and voluntary green building measures to conserve energy. Therefore, compliance with Title 24 of the California Code of Regulations and the L.A. Green Building Code would reduce the project's energy consumption.

As with the project, the related projects would also be expected to incorporate energy conservation features, comply with applicable regulations including the 2016 Title 24 standards and CALGreen code, the L.A. Green Building Code, and incorporate mitigation measures, as necessary. In addition, development projects within SoCalGas's service area, including the project and related

[173] California Gas and Electric Utilities, 2020 California Gas Report. Table 34. Available: https://www.socalgas.com/sites/default/files/2020-10/2020_California_Gas_Report_Joint_Utility_Biennial_Comprehensive_Filing.pdf. Accessed: July 19, 2021.

projects, would also be anticipated to incorporate site-specific infrastructure improvements, as appropriate.

Conclusion

The project's contribution to a cumulative impact with respect to natural gas plans as well as infrastructure would not be cumulatively considerable and, thus, would result in a less than significant cumulative impact.

Telecommunications

Telecommunications are regulated by the Federal Communications Commission and CPUC. Each of the related projects would be reviewed by the City to identify necessary new facilities and service connections to meet their respective needs.

Conclusion

The project's contribution to cumulative impacts with respect to telecommunications as well as infrastructure would not be cumulatively considerable and, thus, would result in a less than significant cumulative impact.

Solid Waste

Solid waste disposal is a regional issue addressed by regional agencies, in this case the County of Los Angeles. The County promotes the efforts of individual jurisdictions to maximize waste reduction and recycling, expand existing landfills, and promote alternative technologies to reduce waste. Most notably, the City of Los Angeles, as part of its SWIRP, aims for the City of Los Angeles to achieve a goal of 90 percent diversion by 2025. The analysis of the project's potential impacts, above, is based on landfill capacity and demand per the Countywide Integrated Waste Management Plan. Planning for landfill needs takes into account continuing cumulative demand and increases in cumulative demand associated with growth including construction and operation of projects. Therefore, the analyses associated with that plan take into account cumulative development.

Like the project, the related projects would be required to comply with applicable regulations related to construction and operation of solid waste, including those pertaining to waste reduction and recycling. Detailed components regarding waste reduction and recycling would be finalized for each related project on a project-by-project basis at the time of plan submittal to the City for the necessary building permits and reviews conducted pursuant to the L.A. Green Building Code, as applicable. As such, impacts to the solid waste from related projects would be less than significant. As discussed above, the project would not generate solid waste that would exceed landfill capacities and the recycling of solid waste related to construction and operation of the project would be required to comply with all federal, State, and local regulations including the L.A. Green Building Code and the SWIRP.

Conclusion

The project's contribution to cumulative impacts would not be cumulatively considerable, and cumulative impacts related to solid waste would be less than significant.

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

If located in or near state responsibility areas of lands classified as very high fire hazard severity zones, would the project:

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

No Impact. The project site is located within a highly urbanized area and is currently developed with a 2-story warehouse building with no natural vegetation. Therefore, the only vegetation permanently located on the project site are trees, shrubs and other plants. The project site is not located in an area of moderate or very high fire hazard.[174] Additionally, the project site is not located in or near state responsibility areas of lands classified as very high fire hazard severity zones.[175] As the project is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones, with respect to wildfire hazards, the project's construction and operation would not result in the impairment of an adopted emergency response plan or emergency evacuation plan.

Conclusion

No impact would occur and no mitigation measures would be required.

[174] Zimas Website, http://zimas.lacity.org/, accessed July 27,2021.

[175] Los Angeles County Fire Hazard Severity Zones in SRA, adopted by CAL FIRE on November 7, 2007, https://osfm.fire.ca.gov/media/6705/fhszs_map19.pdf , accessed July 27,2021.

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

No Impact. The project site is not located in an area of moderate or very high fire hazard.[176] Additionally, the project site is not located in or near state responsibility areas of lands classified as very high fire hazard severity zones.[177] The project is not located in a sloped area and is surrounded by urban development. As such, the project's construction and operation would not exacerbate wildland risks and would not expose occupants to pollutant concentrations from a wildfire or uncontrolled spread of a wildfire.

Conclusion

No impact would occur and no mitigation measures would be required.

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

No Impact. The project site is not located in an area of moderate or very high fire hazard.[178] Additionally, the project site is not located in or near state responsibility areas of lands classified as very high fire hazard severity zones.[179] Therefore, because the project site is not located near a state responsibility area nor any very high fire severity zone, with respect to wildfire hazards, construction and operation of the project would not require installation or maintenance of associated that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.

Conclusion

No impact would occur and no mitigation measures would be required.

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

No Impact. The project site is not located in an area of moderate or very high fire hazard.[180] Additionally, the project site is not located in or near state responsibility areas of lands classified as very high fire hazard severity zones.[181] The project site is surrounded by urban development and is not adjacent to any wildlands. As discussed in Section 6.9, *Hydrology and Water Quality*,

[176] Zimas Website, http://zimas.lacity.org/, accessed July 27,2021.

[177] Los Angeles County Fire Hazard Severity Zones in SRA, adopted by CAL FIRE on November 7, 2007, https://osfm.fire.ca.gov/media/6705/fhszs_map19.pdf. Accessed July 27,2021.

[178] Zimas Website, http://zimas.lacity.org/, accessed July 27,2021..

[179] Los Angeles County Fire Hazard Severity Zones in SRA, adopted by CAL FIRE on November 7, 2007, https://osfm.fire.ca.gov/media/6705/fhszs_map19.pdf. Accessed July 27,2021.

[180] Zimas Website, http://zimas.lacity.org/, accessed July 27,2021.

[181] Los Angeles County Fire Hazard Severity Zones in SRA, adopted by CAL FIRE on November 7, 2007, https://osfm.fire.ca.gov/media/6705/fhszs_map19.pdf. Accessed July 27,2021.

according to the City of Los Angeles General Plan Safety Element, the project site is not located with a 100-Year or 500-Year flood plain.[182] As noted in the Geotechnical Investigation, the project site is just outside the "dam or debris basin flood area" (Los Angeles County Safety Element [1990]) of the Hansen Dam Reservoir, located approximately 17 miles to the northwest of the project site.[183]

The project site is relatively flat with little topography that would expose people or structures to landslides. The project would not contain uses or activities that would exacerbate existing environmental conditions. As discussed in Section 6.7, *Geology and Soils*, the project site is not located within a landslide inventory area. Combined with the fact that the project site is not within or near a state responsibility area or a very high severity fire zone, there is no impact in relation to risks associated with downslope or downstream flooding or landslides as a result of runoff or post fire slope instability or drainage changes.

Conclusion

No impact would occur and no mitigation measures would be required.

Cumulative Impacts: Wildfire

The related projects are all located in a highly urbanized area, would not contain wildland features, are not located adjacent to any wildland areas, and are not located within any state responsibility area.[184] Any related projects would be subject to established guidelines and building code regulations and construction procedures pertaining to fire and seismic hazards. All related projects would be subject to review by the LAFD for compliance with Fire Code and Building Code regulations related to emergency response, emergency access, and fire safety.

Conclusion

Based on the above considerations, the project which would have no wildfire impacts, would not result in a cumulatively considerable contribution to cumulative impacts associated with wildfires.

[182] City of Los Angeles General Plan, Safety Element Exhibit F, 100-Year & 500-Year Floodplains, March 1994.

[183] Preliminary Site Geotechnical and Geologic Assessment Report for Proposed 40-Story High-Rise Mixed-Use Development Project 1101-1115 S. Hill Street and 206-210 W. 11th Street, Los Angeles, California, (Geotechnical Investigation) dated August 2021, prepared by AECOM.

[184] Zimas Website, http://zimas.lacity.org/, accessed July 27,2021.

6.21 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 that 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?

Less Than Significant with Mitigation Incorporated. The preceding analysis does not reveal any significant immitigable impacts to the environment. The project site is located within a highly urbanized area and is currently developed with a vacant warehouse building.

There is no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plan which applies to the project. No wildlife corridors, native wildlife nursery sites, or bodies of water in which fish are present are located on the project site or in the surrounding area.

However, the project site does include ornamental trees that could support raptor and/or songbird nests. Migratory nongame native bird species are protected by international treaty under the Federal MBTA of 1918 (50 C.F.R. Section 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). Environmental impacts from project implementation may result due to the loss of a tree on the site.

Compliance with standard regulatory compliance measures would reduce potential impacts upon migratory bird species associated with the proposed tree removals, should construction commence during the breeding season.

The project would not eliminate important examples of the major periods of California history or prehistory. As discussed in Sections 6.5, *Cultural Resources*, there would be no direct or indirect impacts to historical resources. The project would not be expected to result in significant impacts on archaeological and tribal cultural resources related to a substantial adverse change in the significance of a prehistoric archaeological resource. However, if unanticipated archaeological resources are encountered during ground-disturbing activities, impacts would be less than significant with adherence to applicable conditions of approval and regulatory compliance measures (RCM-CR-1). Impacts to human remains would be less than significant with adherence to applicable conditions of approval and regulatory compliance measures (RCM-CR-2).

As discussed in Section 6.7, *Geology and Soils*, the NHMLAC advised that deeper excavations in the proposed project area that extend down into older Quaternary sediments may encounter significant vertebrate fossils. The excavations associated with the project are expected to reach a maximum depth of approximately 45 feet, which could be well beyond the deeper younger Quaternary Alluvium deposits. In addition, the presence of vertebrate fossil localities immediately south of the project site raises the paleontological sensitivity of the area. Therefore, impacts to paleontological fossils could be significant. However, impacts to paleontological resources would be reduced to less than significant with implementation of mitigation measure MM-GEO-1 which would ensure proper identification, treatment and preservation of any paleontological resource resources. Implementation of MM-GEO-1 would reduce potentially significant unforeseen impacts to paleontological resources to a less than significant level.

Overall, based on the preceding analysis of potential impacts, no evidence is presented that the project would degrade the quality of the environment.

Conclusion

Impacts related to the substantial degradation of the environment would be less than significant.

b. Does the project have impacts which are individually limited, but cumulatively considerable? ("Cumulative considerable" means that the incremental effects of an individual 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).

Less Than Significant with Mitigation Incorporated. Pursuant to PRC Section 21155.2(b), the SCEA is required to identify all significant or potentially significant impacts of a transit priority project, other than those that do not need to be reviewed pursuant to Section 21159.28, based on substantial evidence in light of the whole record. Additionally, the SCEA is required to identify any cumulative effects that have been adequately addressed and mitigated pursuant to prior applicable certified EIRs. CEQA defines cumulative impacts as "two or more individual effects which, when considered together are considerable or which compound or increase other environmental impacts." The analysis of cumulative impacts need not be as in-depth as what is performed relative to the project, but instead is to "be guided by the standards of practicality and reasonableness." Additionally, the SCEA is required to identify any cumulative effects that have been adequately addressed and mitigated in prior applicable certified EIRs (refer to Section 3, *Transit Project Consistency Analysis*). Where the City, as the lead agency, determines that a

cumulative effect has been adequately addressed and mitigated, that cumulative effect shall not be treated as cumulatively considerable.

The analysis of cumulative impacts provided herein is based on an assessment of reasonably foreseeable growth associated with a list of past, present, and anticipated future projects. The list of related projects was provided by LADOT and also includes other projects in the area based recent studies. A list of 35 related projects in the project study area is provided in Table 2-4, *Summary of Related Projects*. Related Projects are mapped on Figure 2-10, *Related Projects Map*. Although these projects serve as the primary bases for evaluation of cumulative impacts, analyses may vary among certain environmental issues due to the unique characteristics and geographic context of certain impacts. The cumulative analyses for each environmental issue are provided below following the assessments of project impacts. The related projects are utilized to analyze cumulative impacts associated with project implementation discussed above. Cumulative impacts for each checklist topic listed in Section 6 of the SCEA have been addressed.

As discussed in Section 6.7, *Geology and Soils*, the project would include project-specific mitigation measure MM GEO-1 to reduce potential impacts on paleontological resources. This mitigation measure requires specific construction procedures to ensure proper identification, treatment and preservation of any paleontological resource resources. Implementation of MM-GEO-1 would reduce potentially significant unforeseen impacts to paleontological resources to a less than significant level.

Many of the related projects would require excavation that could potentially expose or damage potential paleontological resources. Generally, however, projects with the potential for substantial excavation would be subject to environmental review under CEQA. If the potential for significant impacts on paleontological resources were identified given the site characteristics and development program of the cumulative projects, mitigation measures would be required. As with the project, these measures would include a monitoring program and treatment/curation of discovered fossils. Implementation of these measures would reduce the potential for adverse effects on fossil resources individually and cumulatively, and would preserve and maximize the potential of these resources to contribute to the body of scientific knowledge.

Impacts associated with geologic and soil issues are typically confined to individual project sites or within a very localized area because of site-specific conditions. Related projects would be subject to established guidelines and building code regulations and construction procedures pertaining to seismic hazards. The Los Angeles Building Code would require consideration of seismic design for all related projects. Related projects would be required to implement LAMC regulations for grading and excavations during construction, and implement any appropriate mitigation measure to reduce geologic or seismic hazards. Like the project, related projects would be required to comply with guidelines and building code regulations that would reduce risks pertaining to seismic hazards, seismic rupture, lateral spreading, subsidence, liquefaction, or collapse to less than significant.

As discussed in Section 6.13, *Noise*, potentially significant noise impacts during project construction and operation would be reduced to less-than-significant levels through compliance

with applicable regulations, implementation of the project's PDFs, and implementation of the identified project-specific mitigation measures. Related projects would be subject to LAMC Section 41.40, which limits the hours of allowable construction activities, and each of the related projects would also be subject to Section 112.05 of the LAMC, which prohibits any powered equipment or powered hand tool from producing noise levels that exceed 75 dBA at a distance of 50 feet from the noise source within 500 feet of a residential zone. With respect to operational noise, on-site noise levels associated with each of the related projects would be subject to the applicable City noise regulations (e.g., such as LAMC Sections 112.01, 112.02, 112.04, 114.02, and 114.03) to ensure that their noise levels would not adversely affect adjacent land uses.

Conclusion

Based on the analysis above, the City finds that with adherence to applicable regulations, project design features, the SCAG 2020-2045 RTP/SCS Mitigation Monitoring and Reporting Program mitigation measures, and project-specific mitigation measures incorporated into the project, the contribution of the project to cumulative impacts would not be cumulatively considerable, and cumulative impacts would be less than significant.

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

Less Than Significant with Mitigation Incorporated. For the purpose of this SCEA, a significant impact may occur if a project has the potential to result in significant impacts, as discussed in the preceding sections. As discussed in Sections 6.7, *Geology and Soils*, and 6.13, *Noise*; with adherence to applicable regulations, project design features, the SCAG 2020-2045 RTP/SCS Mitigation Monitoring and Reporting Program mitigation measures, and project-specific mitigation measures, project-related impacts would be less than significant. The analysis contained in this SCEA concludes that the project would not result in significant adverse effects after implementation of mitigation measures.

Conclusion

Based on the preceding environmental analysis, the project would not have significant environmental effects on human beings, either directly or indirectly. Any potentially significant impacts would be reduced to less than significant levels through adherence to applicable regulatory compliance measures, project design features, the SCAG 2020-2045 RTP/SCS Mitigation Monitoring and Reporting Program mitigation measures, and implementation of the applicable project-specific mitigation measures as identified in Sections 6.1, *Aesthetics*, through 6.20, *Wildfire*, above.

As discussed in Section 6.7, *Geology and Soils*, the project would include project-specific mitigation measures MM GEO-1 to reduce potential impacts to less than significant levels to paleontological resources.

As discussed in Section 6.13, *Noise*, potentially significant noise impacts during project construction and operation would be reduced to less than significant levels though implementation of Project-specific project design features, regulatory compliance, and project-specific mitigation measures MM NOI-1 and MM NOI-2**.**