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

INITIAL STUDY

The Bloc

Case Number: ENV-2021-9959-EIR

Project Location: 700 South Flower Street, 700 West 7th Street, 711 and 775 South Hope Street, Los Angeles, California 90017

Community Plan Area: Central City

Council District: 14—de León

Project Description: NREA-TRC 700, LLC (Applicant), proposes to construct 466 residential units within a new 53-story high-rise tower and The Bloc Supplemental Use District signage program (Project) on a 186,674-square-foot (4.285-acre) site known as The Bloc. The Bloc is located at 700 South Flower Street, 700 West 7th Street, and 711 and 775 South Hope Street (Project Site) in the Central City Community Plan (Community Plan) area of the City of Los Angeles (City). The Project Site comprises an entire City block that is currently developed with hotel and commercial uses and associated parking and contains a portal to the 7th Street/Metro Central rail station. The 53-story tower would be located on the southern half of the Project Site (the Development Area) and would be a new building extending through and above the parking/retail podium building. The existing podium building would be increased from nine to 12 stories with the enclosure of the rooftop parking and the construction of two new levels of parking, and the new 53-story tower would extend 41 stories above the 12-story podium. The Project Site's existing hotel and commercial uses (most of which are located outside the Development Area) would be retained, with the exception of approximately 24,342 square feet of existing commercial (theater and retail) uses in the existing podium that would be changed to residential uses (including a new residential lobby). The residential uses would be located primarily within the new tower with a small portion of residential square footage (e.g., bicycle parking areas, mail, utility, and storage rooms) located in the podium building. The residential uses would comprise a total of approximately 495,016 square feet of floor area, consisting of the conversion of approximately 24,342 square feet of existing commercial uses within the podium building and the net increase of 470,674 square feet in the new 53-story tower. The two existing basement levels below the podium building, which include one level of vehicle parking and one level of loading areas would be retained. Upon completion of the Project, the Project Site would include a total of 1,894,988 square feet of floor area with a floor area ratio of 10.15:1. The Project Site would include a total of 1,948 vehicular parking spaces located within eight above ground parking levels and one basement parking level. The Project would also establish a Sign District to permit specific signage.

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

PREPARED BY:
Eyestone Environmental, LLC

APPLICANT:
NREA-TRC 700, LLC

December 2022

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1 INTRODUCTION

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

This Initial Study (IS) evaluates the potential environmental effects that could result from the construction, implementation, and operation of the proposed Project. This Initial Study has been prepared in accordance with CEQA (Public Resources Code Section 21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations Section 15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006). The City uses Appendix G of the State CEQA Guidelines as the thresholds of significance unless another threshold of significance is expressly identified in the document. Based on the analysis provided within this Initial Study, the City has concluded the Project may result in significant impacts on the environment, and the preparation of an Environmental Impact Report (EIR) is required. This Initial Study and the forthcoming EIR are intended as informational documents, which are ultimately required to be considered and certified by the decision-making body of the City prior to approval of the Project.

1.1 PURPOSE OF AN INITIAL STUDY

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

An Initial Study is a preliminary analysis conducted by the Lead Agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the Initial Study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, the Lead Agency shall prepare a Negative Declaration. If the Initial Study identifies potentially significant effects but revisions have been made by or agreed to by the applicant that would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, a Mitigated Negative Declaration is appropriate. If the Initial Study concludes that neither a Negative Declaration or Mitigated Negative Declaration is appropriate, an EIR is normally required.[1]

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

1.2 ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into sections as follows:

1. INTRODUCTION

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

2. EXECUTIVE SUMMARY

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

3. PROJECT DESCRIPTION

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

4. EVALUATION OF ENVIRONMENTAL IMPACTS

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

1.3 CEQA PROCESS

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

1.3.1 Initial Study

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

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

1.3.2 Draft EIR

Once the Draft EIR is complete, a Notice of Completion and Availability is prepared to inform public agencies and the general public of the availability of the document and the locations where the document can be reviewed. The Draft EIR and Notice of Availability are circulated for a 45-day review and comment period. The purpose of this review and comment period is to provide public agencies and the general public an opportunity to review the Draft EIR and comment on the adequacy of the document, including the analysis of environmental effects, the mitigation measures presented to reduce potentially significant impacts, and the alternatives analysis. After the close of the 45-day review and comment period, responses to all comments on environmental issues received during the comment period are prepared.

1.3.3 Final EIR

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

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

2 EXECUTIVE SUMMARY

PROJECT TITLE	**The Bloc**
ENVIRONMENTAL CASE NO.	ENV-2021-9959-EIR
RELATED CASES	CPC-2021-9958-TDR-ZV-SPR-HCA, VTT-83482-HCA, and CPC-2018-6388-SN

PROJECT LOCATION	700 South Flower Street, 700 West 7th Street, 711 and 775 South Hope Street Los Angeles, California 90017
COMMUNITY PLAN AREA	Central City
GENERAL PLAN DESIGNATION	Regional Center Commercial
ZONING	C2-4D
COUNCIL DISTRICT	14— de León

LEAD AGENCY	**City of Los Angeles**
CITY DEPARTMENT	Department of City Planning
STAFF CONTACT	Kathleen King
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APPLICANT	**NREA-TRC 700, LLC**
ADDRESS	700 S. Flower Street, Suite 450 Los Angeles, CA 90017
PHONE NUMBER	213-624-2891

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

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

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

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

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

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

Kathleen King, City Planner	December 16, 2022
PRINTED NAME, TITLE	**DATE**

EVALUATION OF ENVIRONMENTAL IMPACTS

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

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

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

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

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

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

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

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

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

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

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

9) The explanation of each issue should identify:

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

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

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

NREA-TRC 700, LLC (Applicant), proposes to construct 466 residential units within a new high-rise tower (new tower) and The Bloc Supplemental Use District signage program (Project) located within a 186,674-square-foot (4.285-acre) site known as The Bloc. The Bloc is located at 700 South Flower Street, 700 West 7th Street, and 711 and 775 South Hope Street (Project Site) in the Central City Community Plan (Community Plan) area of the City of Los Angeles (City). The new 53-story tower address will be 775 South Hope Street. The Project Site comprises an entire City block that is currently developed with hotel and commercial uses and associated parking and contains a portal to the 7th Street/Metro Central rail station. The existing commercial uses consist of office, theater, retail, restaurant/bar, gym/fitness, and medical office uses. The new tower would be located on the southern half of the Project Site (the Development Area) within and above the existing nine-story parking/retail podium building. The existing hotel and commercial uses, which are located on the Project Site but outside the Development Area, would be retained, with the exception of approximately 24,342 square feet of existing commercial (theater and retail) uses that would be changed to residential uses (including a new residential lobby). No changes are proposed to the existing 7th Street/Metro Central rail station portal. The residential uses would be located primarily within the new tower with a small portion of residential square footage, such as bicycle parking areas and other residential services (e.g., residential mail, package and utility rooms), located in the podium building. In addition to the new high-rise tower, the rooftop parking level of the existing nine-story commercial podium building would be enclosed, and two additional levels of parking would be added, increasing the podium to 12 stories. The residential uses would comprise a total of approximately 495,016 square feet of floor area, consisting of the conversion of approximately 24,342 square feet of existing commercial uses within the existing parking/retail podium building and the net increase of 470,674 square feet in the new 53-story tower, which will extend 41-stories above the 12-story podium. The two existing basement levels, which include one level of vehicle parking and one level of loading areas, below the podium building would be retained. (Note: The parking in Level A, one of the basement levels, extends throughout the entire Project Site.) Upon completion of the Project, the Project Site would include a total of 1,894,988 square feet of floor area with a floor area ratio (FAR) of 10.15:1. The Project Site would include a total of 1,948 vehicular parking spaces located within eight above ground parking levels and one basement parking level. The Project would also add 214 bicycle parking spaces (192 long-term and 22 short-term). See Table 1 on page 14 further below.

The Applicant has also requested that the City approve a Sign District as part of the Project. The proposed Sign District would establish signage standards for the entire Project Site. As described in more detail below, the proposed Sign District's Conceptual Sign Plan includes a total of 17 wall signs, of which 14 are proposed as digital display signs and three are proposed as non-digital identification signs. Additionally, the Conceptual Sign Plan includes three exterior digital kiosks (one is floor mounted and two are wall mounted) and 11 interior digital kiosks (six are floor mounted and five are wall mounted). These digital kiosks would identify tenants and serve to orient and direct visitors to the various uses at The Bloc and would include off-site advertising. The Project is proposing a total of 14 Interior digital signs, comprised of seven Digital Wall Signs and seven Digital Kiosks. All digital displays and digital kiosks would only be programmed with static images and no signage would be permitted in the public right-of-way.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

The Project Site is located within the Central City Community Plan area of the City with addresses that include 700 South Flower Street, 700 West 7th Street, and 711 and 775 South Hope Street. As shown in Figure 1 on page 9, the Project Site is centrally located within Downtown Los Angeles and consists of an entire City block bounded by 7th Street to the north, 8th Street to the south, Hope Street to the east, and Flower Street to the west. Regional access to the Project Site is provided by State Route 110 (SR-110), located approximately 0.25 mile west of the Project Site and the Hollywood Freeway (US-101) located approximately one mile north of the Project Site.

3.2.2 Existing Conditions

As shown in the aerial photograph provided in Figure 2 on page 10, the Project Site is currently occupied by The Bloc, a mixed-use development that encompasses the entire block. The northern portion of the Project Site (outside of the Development Area) is developed with a 33-story office tower and a 26-story hotel tower, both programmed with ground floor commercial uses that surround the outdoor plaza, and a direct portal to the 7th Street/Metro Central rail station. The southern portion of the Project Site that comprises the Development Area is currently developed with an existing nine-story parking/retail podium building, which includes five stories of enclosed parking, four stories of existing retail floor area (one of which includes theater uses), and rooftop parking. There is an approximate 11-foot grade change from the high point of the Project Site at 7th and Flower Streets and the low point near 8th and Hope Streets. The existing uses total approximately 1,424,314 square feet of floor area and are comprised of 656,423 square feet of office space, 28,599[2] square feet of medical office space, 269,622 square feet of retail uses, 23,180 square feet of restaurant/bar areas, 30,363 square feet of fitness uses, a 28,770-square-foot theater that includes 569 fixed seats, and a 387,357-square-foot hotel that includes 496 rooms and 25,282 square feet of meeting/banquet spaces. The Project Site also includes approximately 1,971 parking spaces.

The Project does not propose any changes to the existing vehicular ingress/egress driveways and no new driveways are proposed. Vehicular access to the Project Site is provided via existing ingress/egress driveways along Hope Street, 8th Street, and Flower Street. Primary vehicle access is provided via two ingress/egress driveways along Flower and Hope Streets. Additionally, one ingress/egress driveway as well as a separate driveway designated for delivery vehicles to access the subterranean loading area, is located along the mid-block of 8th Street. The hotel's porte-cochere, which provides a pick-up/drop-off area and valet parking for hotel guests is located mid-block along Hope Street. Pedestrian access to the Project Site is located along Hope Street, 8th Street, Flower Street, and 7th Street.

Existing landscaping adjacent to the Project Site includes 25 right-of-way trees. There are no private property trees associated with the Project Site. None of the 25 right-of-way trees are considered to be

[2] Sheet A005B of the architectural plans denote The Bloc's (E) Retail use as inclusive of retail, restaurant/bar, gym/fitness and medical office uses, totaling 351,764 square feet.

Figure 1
Project Location Map

Source: ArcGIS, 2022; Eyestone Environmental, 2022.

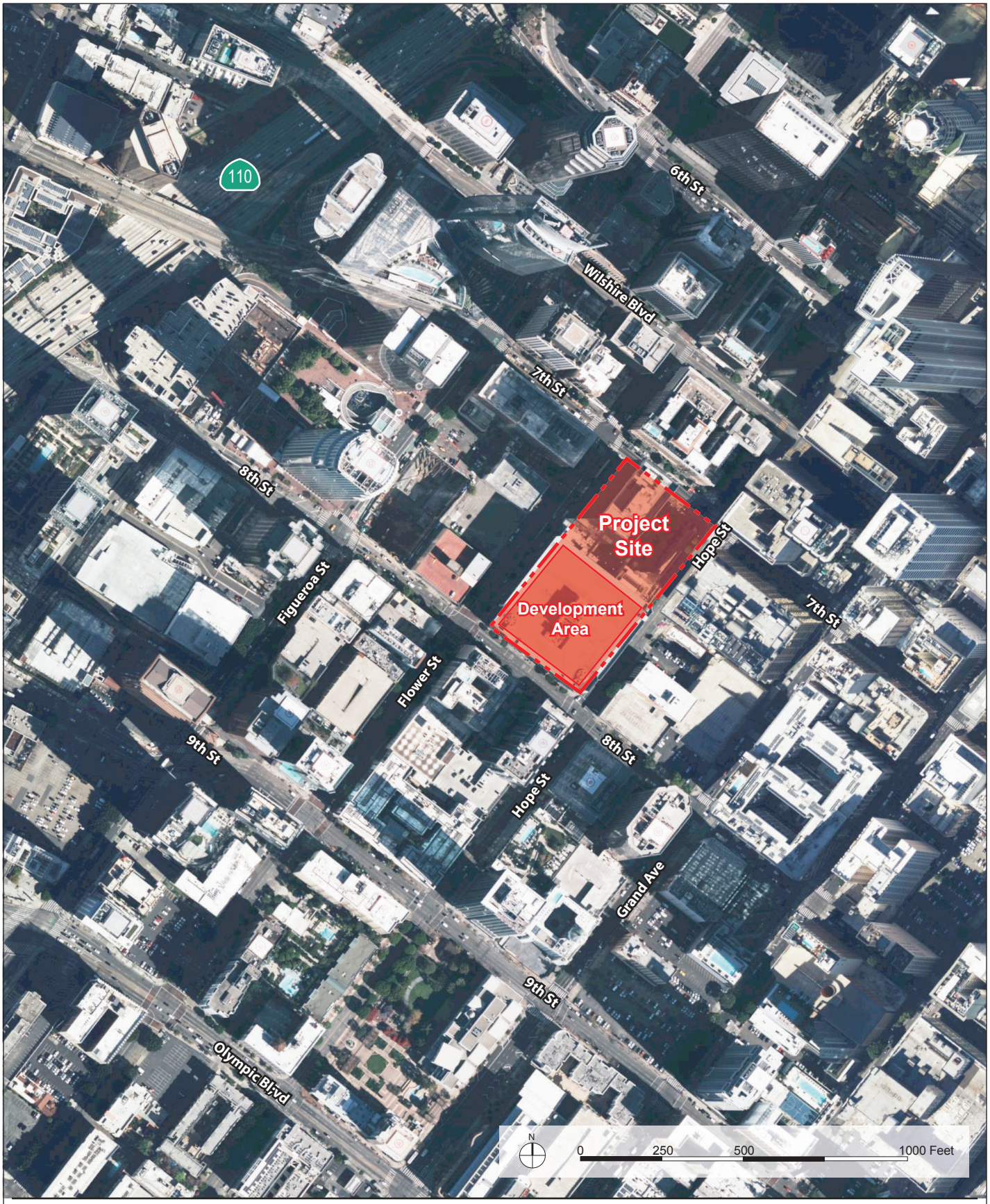

Figure 2

Aerial Photograph of the Project Site and Vicinity

Source: Apple Maps, 2022, Eyestone Environmental 2022.

protected by the City of Los Angeles Protected Tree and Shrubs Ordinance No. 186,873.[3,4] As indicated in the Tree Inventory Report, five of the 25 right-of-way trees on Hope Street would be removed as part of the Project and replaced in compliance with applicable City requirements. All other street trees would be avoided or preserved in place.

The Project Site is located within the Financial Core of the Central City Community Plan area. Under the Community Plan, which was last updated in January 2003, the Project Site has a General Plan land use designation of Regional Center Commercial. The Project Site is zoned C2-4D by the LAMC. The number "4" in the Project Site's zone designation of C2-4D denotes Height District 4 which allows a maximum FAR of 13 to 1. The "D" denotes the D Limitation, enacted under Ordinance 164,307 (Subarea 1915) effective January 30, 1989, which limits FAR to a maximum of 6 to 1 with some exceptions including the Transfer of Floor Area Rights (TFAR). The Los Angeles Department of City Planning is currently in the process of updating the Central City Community Plan under the initiative known as the DTLA 2040 plan. A draft of the proposed General Plan land use designations has been publicly released (but not adopted), placing the Project Site in the "Transit Core" designation. The proposed maximum FAR within the Transit Core ranges from 10:1 to 13:1.

The Project Site is located within a Transit Priority Area (TPA), as defined by Senate Bill (SB) 743 and City Zoning Information (ZI) File No. 2452.[5] The Project Site is well served by a variety of public transit options provided by the Los Angeles County Metropolitan Transportation Authority (Metro), the Los Angeles Department of Transportation (LADOT), and Foothill Transit. Specifically, the northern portion of the Project Site provides a direct portal to the 7th Street/Metro Center rail station, which provides connection to the Metro B (Red) Line, Metro D (Purple) Line, Metro A (Blue) Line, and Metro E (Exposition) Line. Additional transit options include the LADOT Commuter Express lines 409, 431, 437A, 438, 448, and 534; LADOT DASH lines B, E, and F; Metro local lines 51, 52, and 460; Metrolink route 799; and Metro J (Silver) Line.

Additionally, the Project Site is located within the boundaries of the Downtown Streetcar, Metro Right-of-Way Project Area, Downtown Design Guide Project Area, the Freeway Adjacent Advisory Notice for Sensitive Uses, the Greater Downtown Housing Incentive Area, and the Los Angeles State Enterprise Zone. The Project Site is not located within a Redevelopment Area.

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3 Carlberg Associates, City of Los Angeles Tree Inventory Report—The Bloc, 700 S. Flower Street, 700 W. 7th Street, and 711 S. Hope Street, Los Angeles, California 90017, September 17, 2021. See Appendix IS-1 of this IS.

4 Pursuant to the Ordinance No. 186,873 and as defined in LAMC Section 17.02, a protected tree or shrub includes any of the following Southern California indigenous tree species, which measure 4 inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree, or any of the following Southern California indigenous shrub species, which measure 4 inches or more in cumulative diameter, 4.5 feet above the ground level at the base of the shrub: Oak tree; Southern California Black Walnut tree; Western Sycamore tree; California Bay tree; Mexican Elderberry shrub; and Toyon shrub.

5 SB 743 established new rules for evaluating aesthetic and parking impacts under CEQA for certain types of projects. Specifically, Public Resources Code Section 21099(d) states: "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center on an infill site within a TPA shall not be considered significant impacts on the environment." TPAs are areas within 0.5 mile of a major transit stop that are existing or planned. Thus, in accordance with SB 743 and the City's ZI No. 2452, the Project's aesthetic and parking impacts are not considered significant as a matter of law.

3.2.3 Surrounding Land Uses

The area surrounding the Project Site is highly urbanized and includes a mix of mid- to high-rise buildings containing a variety of uses, including commercial (office, retail and restaurant), multi-family residential, institutional, and parking uses. Properties immediately adjacent to the Project Site are zoned C2-4D with a Regional Center Commercial land use designation. Properties to the north of the Project Site along 7th Street are developed with the mid-rise Roosevelt Lofts and 655 Hope Condos adaptive reuse buildings. These multi-story, mixed-use buildings contain ground floor commercial uses that include various dining establishments. Properties to the south of the Project Site along 8th Street are improved with two multi-story mixed-use buildings with ground floor commercial uses (8th+Hope Apartments and the Gas Company Lofts). Properties to the east of the Project Site along South Hope Street are improved with mid-rise commercial and retail building, a small religious structure (the Third Church of Christ, Scientist of Los Angeles), and parking facilities.[6] Properties to the west of the Project Site along Flower Street are improved with two multi-story parking garages, a surface parking lot, and a multi-story office building with ground floor commercial uses that include dining establishments.[7] In addition, construction of a 41-story mixed-use building is underway at the intersection of Figueroa Street and 8th Street. In the Project vicinity, beyond these land uses are numerous high-rise commercial and residential buildings that form the Downtown skyline.

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

As summarized above, the Project would develop 466 residential units within a new high-rise tower located on the 186,674-square-foot (4.285-acre) Project Site known as The Bloc. As shown in Figure 3 on page 13, development of the new tower would occur within the southern half of the Project Site (the Development Area). The existing hotel and commercial uses on the Project Site would be retained, with the exception of approximately 24,342 square feet of existing commercial (theater and retail) uses in the podium that would be changed to residential uses (including the new residential lobby) comprising portions of both the podium and the new tower. The rooftop parking level of the existing nine-story parking/retail podium building would be enclosed, and two additional levels of parking would be added, increasing the podium to 12 stories. The two existing subterranean levels, which provide vehicle parking and loading areas for deliveries, would be retained. (Note: The parking in Level A extends throughout the entire Project Site.) The new tower will be 53 stories and will extend through and above the 12-story podium. A portion of the existing podium building from the existing rooftop parking level to the lower basement, along Hope Street, would be demolished to allow the construction of the new tower within and above the podium. The new tower would extend approximately 710 feet above grade as measured by the LAMC and would be a separate building from the surrounding podium building. Because a portion of the 53-story tower will extend through the 12-story podium, the tower, once constructed, will appear to be a 41-story tower atop a 12-story podium. As shown in Table 1 on page 14, the proposed 53-story tower would include a residential lobby and relocated retail space (Plaza Level), three floors of retail use Street Level and Levels 2 and

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[6] A portion of this property is proposed to be redeveloped with a 50-story mixed-use development with 580 residential dwelling units and ground level commercial uses, per Case No. CPC-2017-505-TDR-ZV-SPPA-DD-SPR.

[7] A portion of this property is proposed to be redeveloped with a new 41-story mixed use tower, per Case No. Case No. CPC-2016-1950-TDR-SPR-1A.

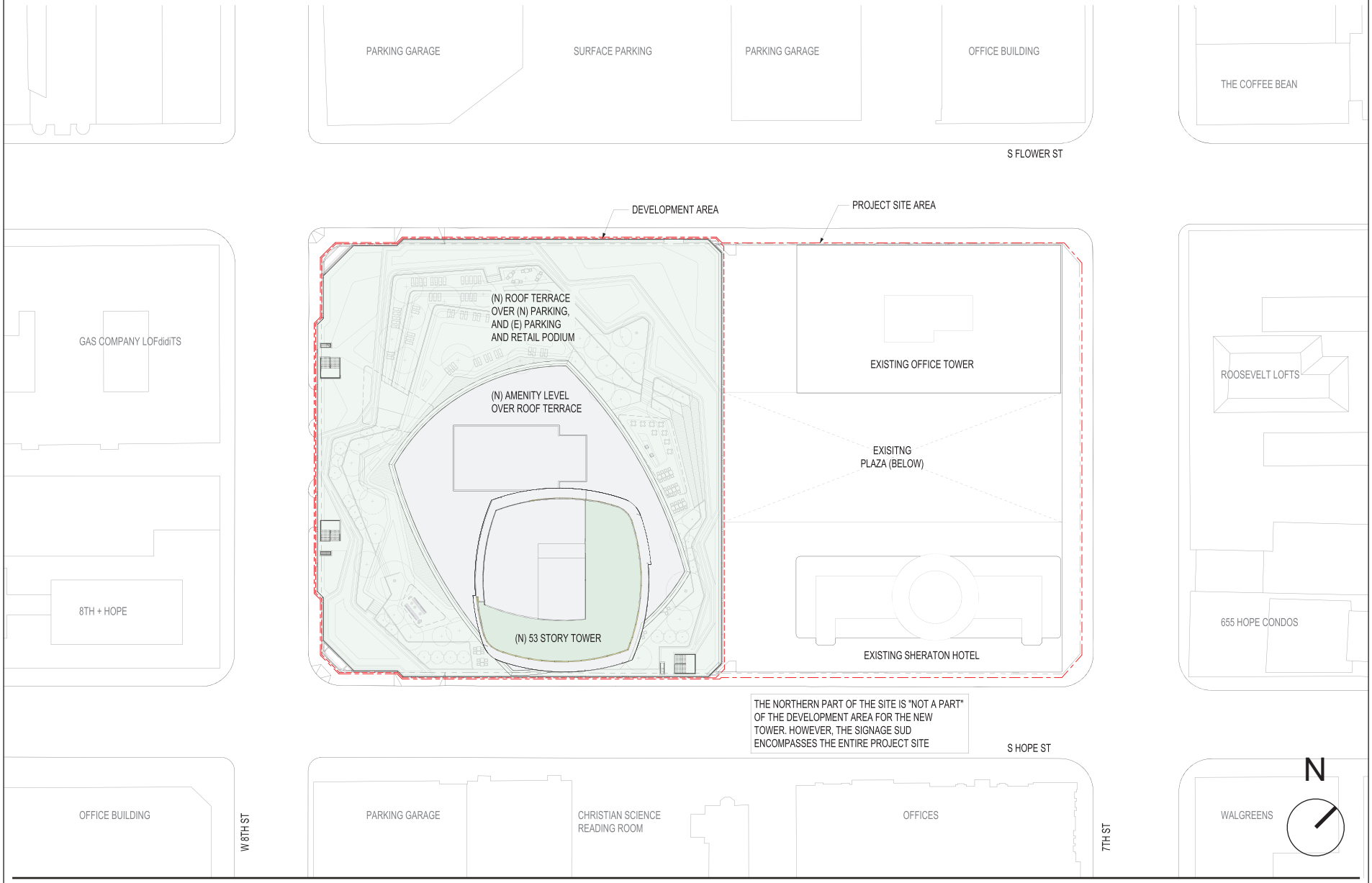


Figure 3
Illustrative Site Plan

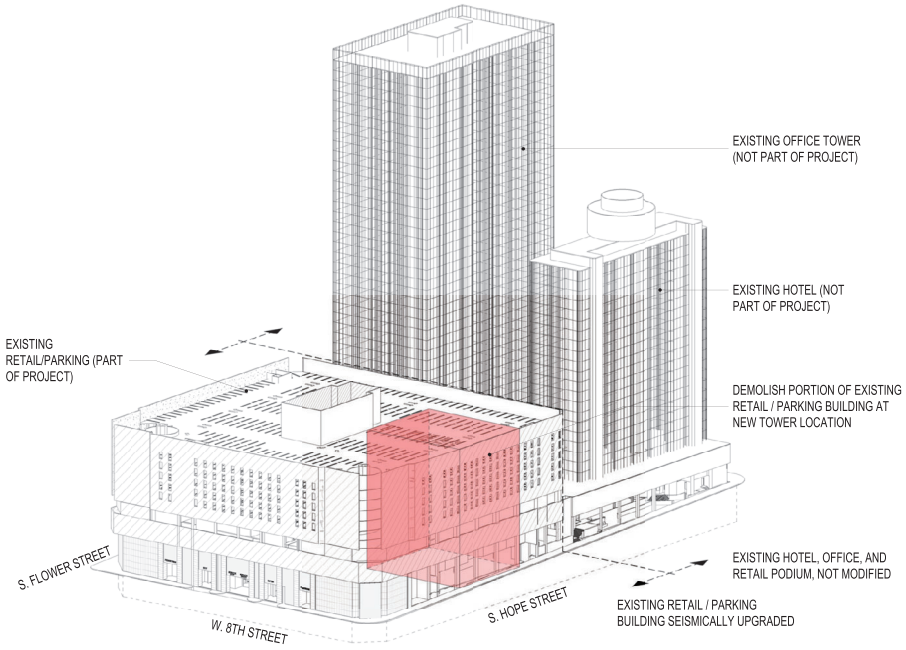
Source: Handel Architects, LLP, 2022.

Table 1
The Bloc—Podium and Tower Building Levels and Uses

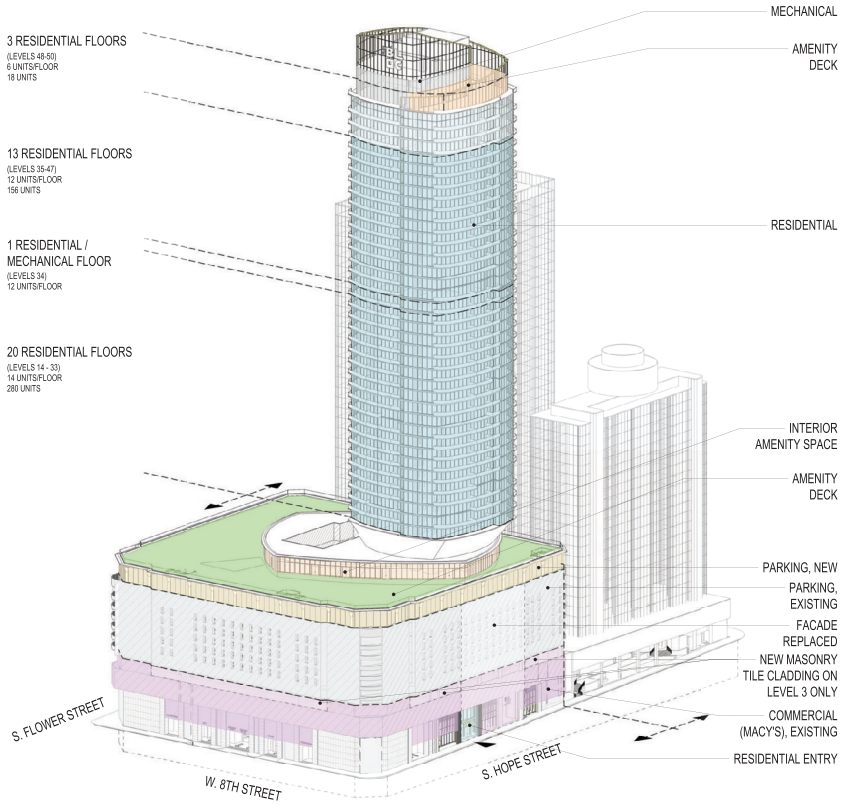
Stories	Level	Parking Level	Use
—	Level 54	—	Mechanical (not counted as a story)
—	Level 53		Mechanical (not counted as a story)
53	Level 52		Mechanical
52	Level 51		Rooftop Amenity Level (Exterior and Interior Space)
15–51	Levels 14–50		Residential Units
14	Level 13		Mechanical Level
13	Level 12		Amenity Level (Exterior and Interior Space at Expanded Podium Roof)
12	Level 11		Parking, Residential Elevator/Stairs, Residential Storage (New Parking Level)
11	Level 10		Parking, Residential Elevator/Stairs, Residential Storage (New Parking Level)
10	Level 9		Parking, Residential Elevator/Stairs, Residential Storage (Rooftop Parking in Existing Building that is Enclosed in Expanded Podium)
9	Level 8		Parking, Residential Elevator/Stairs, Residential Storage
8	Level 7		Parking, Residential Elevator/Stairs, Residential Storage
7	Level 6		Parking, Residential Elevator/Stairs, Residential Storage
6	Level 5		Parking, Residential Elevator/Stairs, Residential Storage
5	Level 4		Parking, Residential Elevator/Stairs, Residential Storage
4	Level 3		Retail, Residential Elevator/Stairs, Theater
3	Level 2		Retail, Residential Elevator/Stairs
2	Street Level		Retail, Residential Elevator/Stairs
1	Plaza Level		Retail, Residential Lobby, Residential Elevator/Stairs Residential Bicycle Stalls
—	Level A		Parking, Electrical, Residential Storage, Residential Bicycle Stalls, Residential Elevator/Stairs (Note: The parking in Level A extends throughout the entire Project Site.)
—	Level B		Loading, Retail/Gym, Mechanical and Electrical, Residential Elevator/Stairs

Source: Handel Architects, LLP, 2021.

3), eight floors with a parking use and residential storage (Levels 4 to 11), 37 floors of residential units (Levels 14 to 50), two amenity floors (on the podium roof level and the tower roof level), and two floors of mechanical uses (Levels 13 to 52). As shown in Figure 4 on page 15, the residential units would be located within the 41 stories of the tower that extend above the 12-story podium. The two subterranean levels of the new tower would be used for parking, loading areas, and mechanical equipment. Every floor in the 53-story tower would include the residential vertical circulation that includes the elevator and stair core. The parking/retail podium levels would retain their current uses



PROGRAM MASSING - EXISTING 1



PROGRAM MASSING - PROPOSED 3

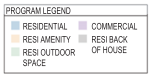


Figure 4
Existing and Proposed Massing

Source: Handel Architects, LLP, 2022.

and would connect to the uses within the tower. Similarly, the two new podium parking levels would also connect to the space within the tower through openings in the shear walls. As discussed in more detail below, the existing podium and subterranean levels would be seismically upgraded to accommodate the residential tower and additional parking levels.

As shown in Table 2 on page 17, the residential uses and associated amenities would comprise approximately 495,016 square feet of floor area. This floor area consists of approximately 24,342 square feet of existing commercial (theater and retail) uses located within the podium that would be converted to residential uses (including the new residential lobby) and a net increase of 470,674 square feet of floor area. Upon completion of the Project, the Project Site would include 1,894,988 square feet of floor area with a FAR of 10.15:1.

3.3.2 Design, Architecture and Seismic Retrofit

The Project Site is located amongst the tallest structures within Downtown Los Angeles (e.g., the 73-story Wilshire Grand Center, the 72-story U.S. Bank Tower, the 52-story Gas Company Tower, the 62-story AON Center, and the 53-story 777 Tower). The proposed tower, with a height of 710 feet has been designed as a slender point tower, addressing its relationship to surrounding towers and its access to views in all directions. As shown in Figure 5 on page 18, the new tower has an expanding floor plate that extends from the existing parking/retail podium with a narrow, tapering stem at the base. The tower façade maximizes access to light and air by providing private balconies and floor to ceiling windows which promote inside/outside living. At north facing units, balcony depths are reduced to maximize access to daylight and views. The tower crown is capped off with a spiraling, rose bud geometry creating a distinct and unique rooftop within the Downtown skyline.

Proposed materials, primarily glass and smooth white metal panels, emphasize the curvature and flowing lines of the tower. The presence of a warmer, bronze like material at select double height balcony soffits serve as accents to the tower. At the base, where the stem of the proposed tower transitions into the podium, an enclosed shared residential amenity space surrounds the building stem and then gives way to an expansive landscaped roof top terrace which would be an outdoor amenity for residential occupants.

The new 53-story tower would be built within and above the existing parking/retail podium building. A portion of the existing podium building would be demolished to create a void space or a notch that would accommodate the construction of the new tower. The new tower would be a structurally separate building with some uses and building systems such as mechanical, electrical and plumbing that cross over from the existing podium to the new tower. Each tower level would be physically separated from the surrounding podium levels by an expansion joint. Upon completion of the demolition and the creation of the notch, the footings and foundation would be constructed. Shear walls and columns in the shape of a rectangle would be built at the perimeter of the portion of the tower located within the podium. The floors at each level of the new tower would be constructed with openings in the shear walls to allow it to connect to the surrounding podium levels (including the two new podium levels). The tower shear wall openings would allow the existing retail and parking uses in the tower and podium to continue to function without obstruction when construction is complete. As discussed in more detail below, the existing podium and subterranean levels would be seismically upgraded to accommodate the residential tower and additional parking levels.

Table 2
Summary of Existing and Proposed Floor Area

Land Use	Existing Floor Area	Floor Area to be Removed	Proposed New Floor Area	Net Increase/ (Decrease)	Total Floor Area Upon Completion of Project
Hotel	387,357 sf (496 rooms and 25,282 sf of banquet space)	0 sf	0 sf	0 sf	387,357 sf (496 rooms and 25,282 sf of banquet space)
Office	656,423 sf	0 sf	0 sf	0 sf	656,423 sf
Retail	269,622 sf	23,888 sf	0 sf	(23,888 sf)*	245,734 sf
Medical Office	28,599 sf	0 sf	0 sf	0 sf	28,599 sf
Gym/Fitness	30,363 sf	0 sf	0 sf	0 sf	30,363 sf
Restaurant/Bar	23,180 sf	0 sf	0 sf	0 sf	23,180 sf
Theater	28,770 sf (569 seats)	454 sf	0 sf	(454 sf)*	28,316 sf (569 seats)
Residential	0 du	0 sf	495,016 sf (466 du)	495,016 sf	495,016 sf (466 du)
Total Floor Area	**1,424,314 sf**	**24,342 sf**	**495,016 sf**	**470,674 sf**	**1,894,988 sf**

sf = square feet

du = dwelling units

( ) = negative value

**24,342 sf of commercial (theater and retail) floor area located within the podium to be converted to residential uses.*

Note: Square footage for the Project Site is calculated pursuant to the LAMC definition of floor area for the purpose of calculating FAR. In accordance with LAMC Section 12.03, floor area is defined as "[t]he area in square feet confined within the exterior walls of a building, but not including the area of the following: exterior walls, stairways, shafts, rooms housing building-operating equipment or machinery, parking areas with associated driveways and ramps, space for the landing and storage of helicopters, and basement storage areas."

Source: Handel Architects, LLP, 2021.

City regulations (Ordinance No. 183,893) require seismic retrofit of the existing non-ductile concrete podium. As part of the seismic retrofit, the diameter of the existing columns must be enlarged by approximately 1 foot. New shear walls would be located on all levels of the existing podium building and the two new parking levels, along the interior walls facing west, south and east. The thickness of the shear walls would range from approximately 2 feet to 3 feet to strengthen the structural support system on each level of the podium. In addition, in order to construct the residential tower, a portion of the existing parking levels and the retail levels of the podium building must be removed to add new structural columns, elevators, stairwells, bicycle parking, mechanical rooms, storage areas, etc. As a result of the seismic retrofit work and the residential structural support, elevators, stairwells, bicycle parking, mechanical rooms and storage areas, a total of 464 existing commercial parking spaces would be eliminated.

Figure 5
Conceptual Rendering

Source: Handel Architects, LLP, 2022.

The design of the Project's two additional parking levels addresses the Updated Advisory Notice Relative to Above-Grade Parking (effective May 12, 2022). The parking footprint and number of residential parking spaces are minimized and the design of the two new parking levels is fully integrated with the new tower and the existing building design. The Project's proposed parking would be reduced from current Code requirements with the approval of the proposed parking variance to allow 0.946 parking space per residential unit in lieu of the required 1.096 parking space ratio. This would reduce residential parking from municipal code requirements by 70 spaces (from 511 to 441 residential parking spaces). Similarly, the commercial and hotel parking would be reduced from Code requirements of 1,636 to 1,507 commercial and hotel parking spaces, a reduction of 129 parking spaces. Further, the visibility of the parking is minimized through the site design. This Project is unique because the Project Site encompasses the entire city block which is fully built out with a hotel and commercial development that will be retained.

Impacts to the public realm and the surrounding community are minimized through the site planning. The two new parking levels would be added to an existing nine-story parking/retail podium that would enclose the rooftop parking level and contains two basement levels resulting in a 12-story podium. Adding the parking atop the existing building that already contains parking (at the new 11th and 12th stories) avoids the placement of additional parking within the pedestrian realm. The project design will allow the existing uses on site, including the open pedestrian plaza area, to remain, and allows for residential, retail and pedestrian features at the street level, activating Hope Street.

The design of the two new parking levels would be integrated seamlessly into the design of the existing parking/retail podium which complements the new tower design and minimizes the visibility of parking. The existing podium's finish material is a large format masonry tile cladding that will remain unchanged. The podium wall is an opaque solid wall material that wraps the podium with small and aligned openings. A portion of the Hope Street façade will be demolished to build the new tower and will be rebuilt using the same finish materials. The exterior of the two new parking levels will be articulated with a perforated metal panel system with integrated vertical elements. Screening materials would achieve an average opacity of 60 percent to minimize light and glare spillover. Additionally, a 3-foot 6-inch high concrete wall at the perimeter of the two new parking levels would shield the vehicular headlights. The top deck of the expanded podium building would incorporate outdoor and indoor amenities for the residential use. Specifically, approximately 60 trees and 41,250 square feet of residential exterior open space consisting of a variety of amenities including a pool deck, lounge areas, and picnic areas with tables and seats would be provided on the top deck (the 13th story), along with other interior residential amenities.

The Project will be designed to promote pedestrian activation by adding the new residential lobby, as well as relocated and improved retail storefront and pedestrian entry to the interior retail plaza, at the ground level along the Hope Street frontage of the existing podium building. The main entrance to the new residential lobby will be located on the ground level along Hope Street and will be highlighted with a clear glass storefront, accentuated doorframe with a colored metal trim. A stone-like material would clad the columns adjacent to the residential entry. These features will distinguish the new residential entry from the retail and plaza entries along the same frontage, each of which will be relocated and improved with storefront doors, glazing, lighting and signage to clearly mark these uses, distinguish them from the residential lobby entrance, and invite pedestrian access. The high-quality finish materials of the ground-level façade and storefronts will create interest at the pedestrian scale. The Project would also improve the pedestrian experience along Hope Street by providing enhanced

sidewalk paving along a 190-foot portion of Hope Street, as shown on the landscape plans. The new trees, within the enhanced sidewalk area, would be located within landscape tree wells.

The two new interior parking levels will be flat and level, except for draining purposes, and would be able to be converted to other uses in the future in the event that parking on those levels would no longer be required. The existing seven parking levels that currently contain parking, including Level A (which is located below grade and extends beyond the parking/retail podium's footprint that encompasses the entire Project Site), Levels 4, 5, 6, 7, 8, and 9 are also relatively flat and could be converted to other uses in the future if parking minimums were eliminated and the future parking demand for the project is low.

3.3.3 Open Space and Landscaping

LAMC Section 12.21-G requires open space for new developments with six or more dwelling units and pursuant to LAMC Section 12.22 C.3(d) . The Greater Downtown Housing Incentive Area (which the Site is located within) permits any percentage of the required open space to be provided as either private or common open space. Per LAMC Section 12.21-G, there shall be 100 square feet of open space provided for each residential unit having less than three habitable rooms; 125 square feet of open space provided for each residential unit containing three habitable rooms; and 175 square feet of open space provided for each residential unit containing more than three habitable rooms. The LAMC also includes a maximum permitted interior open space restriction of 25 percent and a requirement that landscaping must comprise 25 percent of the exterior common open space. Based on these provisions, as shown in Table 3 on page 21, the Project would be required to provide at least 51,700 square feet of open space, of which a minimum of 11,188 would need to be landscaped. The Project would provide approximately 54,750 square feet of open space, of which of which 44,750 square feet would be exterior open space. In addition, 13,600 square feet of the total exterior common open space would be landscaped. Thus, the Project would exceed the open space requirements set forth by the LAMC.

The Project would provide exterior and interior common open space for amenities on the Levels 12 and 51 of the proposed high-rise building. Specifically, as shown in Figure 6 on page 22, on the podium room level (Level 12), approximately 41,250 square feet of residential exterior open space consisting of a variety of amenities including a pool deck, lounge areas, and picnic areas with tables and seats would be provided. Furthermore, a total of 8,000 square feet of interior residential amenity rooms would be provided on this level consisting of multi-purpose space, lounge areas, co-working areas, and a fitness area. As shown in Figure 7 on page 23, on the roof level of the tower (Level 51), approximately 3,500 square feet of exterior open space consisting of lounge and picnic areas, and 2,000 square feet of interior multi-purpose space would be provided.

The Project would remove five right-of-way trees along Hope Street, none of which are considered to be protected by the City of Los Angeles Protected Tree and Shrubs Ordinance No. 186,873.[8,9] Five

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[8] Carlberg Associates, City of Los Angeles Tree Inventory Report—The Bloc, 700 S. Flower Street, 700 W. 7th Street, and 711 S. Hope Street, Los Angeles, California 90017, September 17, 2021. See Appendix IS-1 of this IS.

[9] Pursuant to the Ordinance No. 186,873 and as defined in LAMC Section 17.02, a protected tree or shrub includes any of the following Southern California indigenous tree species, which measure 4 inches or more in cumulative diameter,

(Footnote continued on next page)

Table 3
Summary of Proposed Open Space

Land Use	Quantity	Ratio	Open Space
Required			
Studio (< 3 Habitable Rooms)	83 du	100 sf	8,300 sf
One-Bedroom (< 3 Habitable Rooms)	203 du	100 sf	20,300 sf
One-Bedroom + Den (= 3 Habitable Rooms)	68 du	125 sf	8,500 sf
Two-Bedroom (= 3 Habitable Rooms)	100 du	125 sf	12,500 sf
Three-Bedroom (> 3 Habitable Rooms)	12 du	175 sf	2,100 sf
Total Open Space Required			***51,700 sf***
Proposed			
Exterior Common Open Space			
Level 12	—	—	41,250 sf
Level 51	—	—	3,500 sf
Total Exterior Open Space			***44,750 sf***
Interior Common Open Space			
Level 12	—	—	8,000 sf
Level 51	—	—	2,000 sf
Total Interior Open Space			***10,000 sf***
Total Open Space Provided			***54,750 sf***

du = dwelling unit
sf = square feet
— = Not Applicable
Source: Handel Architects, LLP, 2021.

new replacement right-of-way trees in landscape tree wells are proposed within a 190-foot portion of Hope Street. In accordance with the LAMC, the Project would provide a total of 117 trees including approximately 60 trees on Level 12, 44 trees on Level 13, and 13 trees on Level 51.

3.3.4 Access, Circulation, and Parking

The primary vehicular access to the site would continue to be provided from existing ingress/egress driveways at the southern portion of the Project Site, along Hope Street, 8th Street, and Flower Street. Two existing ingress/egress driveways provide primary access points at the corners of 8th Street and Flower Street and 8th Street and Hope Street that lead to the existing parking structure through a circular ramp that services the overall complex. There are two existing driveways at the corner of

4.5 feet above the ground level at the base of the tree, or any of the following Southern California indigenous shrub species, which measure 4 inches or more in cumulative diameter, 4.5 feet above the ground level at the base of the shrub: Oak tree; Southern California Black Walnut tree; Western Sycamore tree; California Bay tree; Mexican Elderberry shrub; and Toyon shrub.

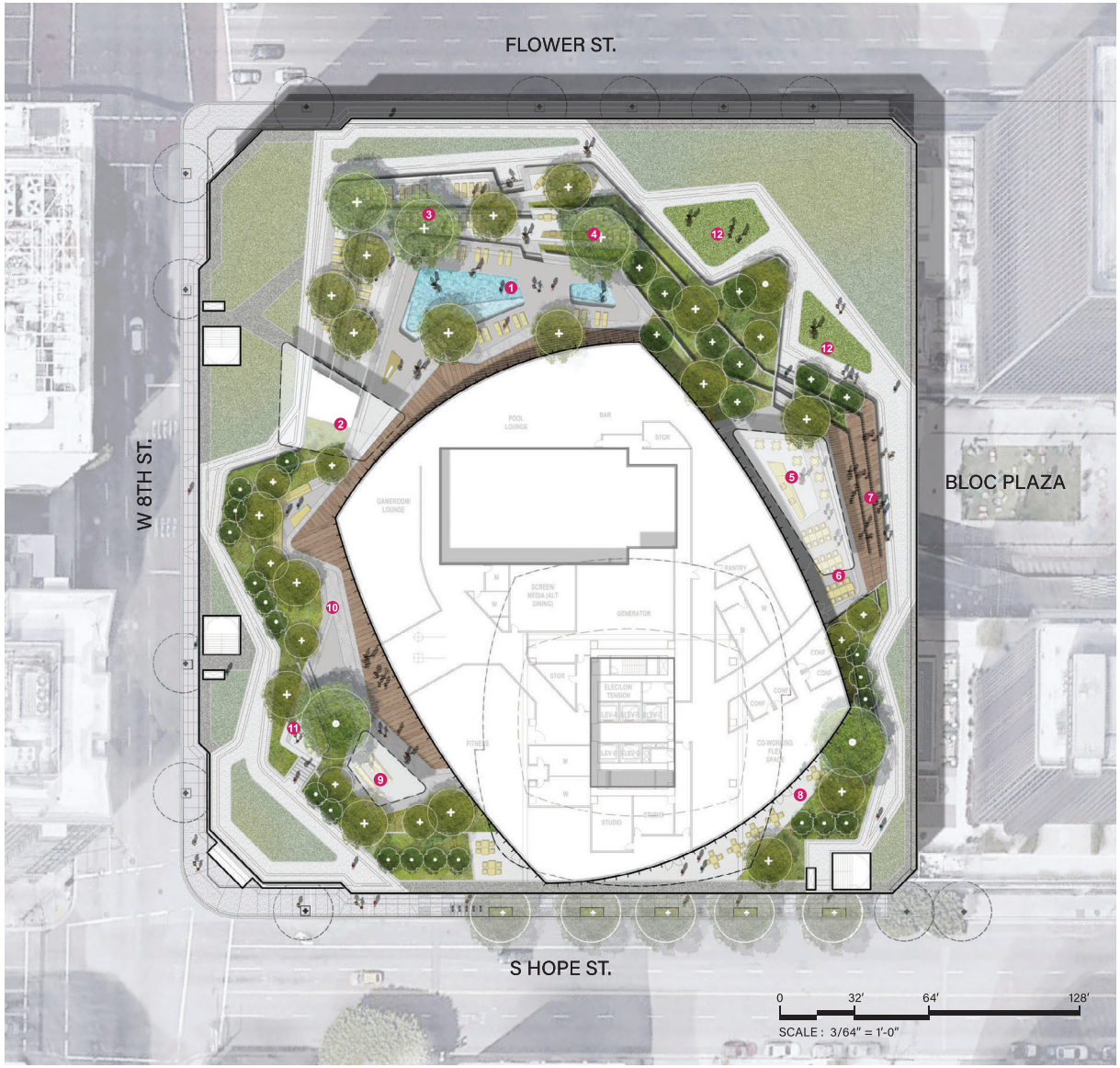

Figure 6

Conceptual Landscape Plan—Level 12

Source: Handel Architects, LLP, 2022.

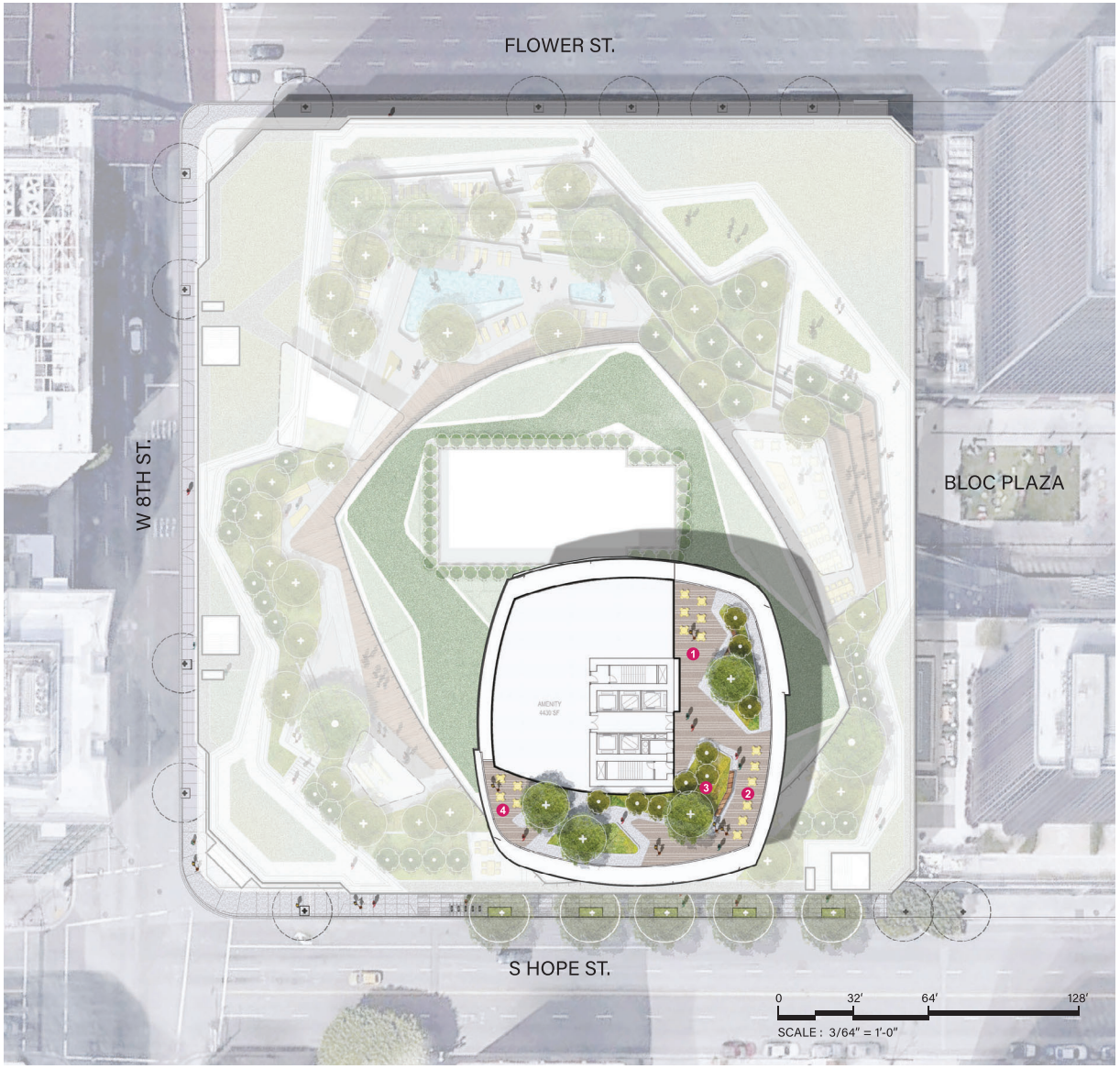

Figure 7
Conceptual Landscape Plan—Level 51

Source: Handel Architects, LLP, 2022.

8th Street and Flower Street and two existing driveways at the corner of 8th Street and Hope Street that will be used for commercial, hotel, and residential uses. On the corner of 8th Street and Flower Street, there is an ingress and egress driveway along Flower Street and one egress-only driveway along 8th Street. Similarly, on the corner of 8th and Hope Street, there is an ingress/egress driveway along Hope Street and one ingress-only driveway along 8th Street. The driveways at the corner of 8th and Hope Streets connect to the one-way circular ramp that provides access to the parking levels above. The driveways at the corner of 8th Street and Flower Street connect to the one-way circular ramp that provides access from the upper levels to the lower levels and also provides access to the other circular ramp via an underground level. An additional loading driveway is located at the mid-block area of 8th Street that accesses subterranean Level B which includes a loading area. A porte-cochere is located mid-block along Hope Street, servicing the hotel use for pick-up and drop-off and valet parking purposes. The existing driveways would remain unchanged and two driveways fronting along 7th Street and Hope Street, near 8th Street, would incorporate pedestrian warning systems. Primary pedestrian access to the Project Site would continue to be from 7th Street, with additional existing driveways along Flower Street and Hope Street. The Hope Street pedestrian entry would be relocated further north of its previous location due the addition of the residential lobby and the Flower Street pedestrian entry would remain in its current location.

3.3.4.1 Residential Parking

As shown in Table 4 on page 25, pursuant to LAMC Section 12.21 A.4(p), the Project is required to provide one space per unit with three habitable rooms or less or 1.25 spaces per unit with more than three habitable rooms; a total of 511 parking spaces for the proposed 466 units. The Applicant is proposing to provide a ratio of 0.946 parking space per residential unit in lieu of the 1.096 parking spaces per unit required by the LAMC. Further, LAMC Section 12.21 A.5 requires one parking space per unit to be designed as a standard space. The Applicant is also proposing to provide a ratio of 0.716 standard space per unit, in lieu of the one standard space per unit requirement of the LAMC. Thus, if the requested variances are approved the Project will provide a total of 441 parking spaces, of which 107 spaces will be compact and 334 will be standard.

3.3.4.2 Parking for Existing Uses

City regulations (Ordinance No. 183,893) require seismic retrofit of the existing non-ductile concrete podium, which provides parking for the existing onsite uses. As part of the seismic retrofit, the diameter of the existing structural columns must be enlarged by approximately 1 foot. New shear walls would be located on all levels of the existing podium building and the two new parking levels, along the interior walls facing west, south and east. The thickness of the shear walls would range from approximately 2 feet to 3 feet to strengthen the structural support system on each level of the podium. In addition, in order to construct the residential tower, a portion of the existing parking levels and the retail level of the podium building must be removed to add new structural columns, elevators, stairwells, bicycle parking, mechanical rooms, storage areas, etc. As a result of the seismic retrofit work and the residential structural support, elevators, stairwells, bicycle parking, mechanical rooms and storage areas, a total of 464 existing commercial parking spaces will be eliminated.

As shown in Table 4, with the addition of the residential tower to the existing development and the change of use of 24,342 square feet of floor area from existing commercial to residential floor area within the podium building, existing commercial and hotel uses are required to provide

Table 4
Vehicular Code Parking Requirement Summary

Land Use	Size	Parking Rate[a]	Parking Requirement
Existing Uses			
Medical Office	28,599 sf	1.00 sp/1,000 sf	29 sp
Office	656,423 sf	1.00 sp/1,000 sf	656 sp
Retail	245,734 sf	1.00 sp/1,000 sf	246 sp
Restaurant	23,180 sf	1.00 sp/1,000 sf	23 sp
Gym/Fitness	30,363 sf	1.00 sp/1,000 sf	30 sp
Theater	569 seats	1.00 sp/10 seats	57 sp
Hotel	496 rm		91 sp
First 20 Guestrooms	20 rm	1.00 sp/2 rm	10 sp
Next 20 Guestrooms	20 rm	1.00 sp/4 rm	5 sp
Remaining Guestrooms	456 rm	1.00 sp/6 rm	76 sp
Hotel Assembly Space	25,282 sf	1.00 sp/100 sf	253 sp
Total Existing Commercial Code Parking Requirement			*1,385 sp*
Allowable Reductions for Transit Proximity[b]			
Commercial		10%	(104) sp
Total Existing Commercial Code Parking Requirement with Transit Reduction (if requested)			*1,281 sp*
Proposed Project			
Residential	466 du		511 sp
≤ 3 Habitable Rooms	286 du	1.00 sp/1 du	286 sp
> 3 Habitable Rooms	180 du	1.25 sp/1 du	225 sp
Total Proposed Project			*511 sp*
Total Existing Commercial & Proposed Project Code Parking Requirement			**1,896 sp**
Total Existing Commercial with Transit Reduction (if requested) & Proposed Project Code Parking Requirement			**1,792 sp**
Existing Parking Covenants[c]			**251 sp**
Total Code Parking with Transit Reduction (if requested) + Covenant Requirement			**2,043 sp**

du = dwelling units

sf = square feet

sp = space

[a] *Commercial office, medical office, retail, restaurant, and assembly space parking rates per LAMC Section 12.21.A4(i) for commercial buildings greater than 7,500 sf within the Downtown Parking District. Hotel and residential parking rates per LAMC Section 12.21.A4(p) for residential and hotel uses within the Central City Parking District.*

[b] *Per LAMC Section 12.24.Y, commercial or industrial buildings, including the Project's retail and office uses, located 1,500 feet of a major transit stop may reduce required parking by 10 percent with Conditional Use Permit approval.*

[c] *Per Parking Affidavit 81-314644 and Parking Affidavit 89-9493331, 251 spaces within the on-site parking garage are covenanted towards satisfying the code parking requirements for nearby properties.*

Source: Gibson Transportation Consulting, Inc., 2022.

1,385 automobile parking spaces in order to meet the current requirements of the LAMC. The Project proposes a parking reduction of 129 parking spaces for the existing commercial and hotel uses, for a

total of 1,256 parking spaces, in lieu of the LAMC required 1,385 parking spaces. In addition, 251 spaces are required by existing parking covenants AFF 81-31644 and AFF 89-94331.

3.3.4.3 Total Project Parking

In total, the Project is proposing a total of 1,948 automobile parking spaces consisting of 441 residential parking spaces, 1,256 parking spaces for the existing commercial and hotel uses, and 251 covenanted parking spaces. These parking spaces would be provided within the podium building and in the two existing subterranean parking levels.

3.3.4.4 Bicycle Parking

The Project is also required to provide a total of 212 bicycle parking spaces for the residential use, including 20 short-term and 192 long-term spaces. The Project would provide a total of 214 bicycle parking spaces, including 22 short-term and 192 long-term spaces. Twelve of the short-term bicycle parking spaces would be located indoors and 10 of the short-term bicycle parking spaces would be located outdoors on the Plaza Level with direct sidewalk and street access. The long-term bicycle parking stalls and bicycle storage would be located on Level A with direct access through the residential lobby elevator.

3.3.5 Lighting and Signage

The Project would introduce new light sources within the Project Site, including interior building lighting, exterior security lighting, exterior architectural lighting, and sign lighting. Project lighting for the residential use would incorporate low-level exterior lights on the building and along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage, architectural features, and landscaping elements would be incorporated within the Development Area to provide for efficient and effective lighting solutions that minimize light trespass from the site. Outdoor lighting sources would be shielded away from adjacent properties to minimize impacts. As discussed below, the Project proposes a Sign Supplemental Use District (Sign District) that would include digital display signage, non-digital identification signs, exterior digital kiosks, and interior digital kiosks. In accordance with the LAMC, light trespass from all digital displays would be below 3 footcandles at existing and proposed residential uses in the immediate area.

A Sign District request was initiated by the Project Site owner on October 31, 2018, under case number CPC-2018-6388-SN. The proposed Sign District encompasses the entire Project Site. The Sign District's goal is to enhance the visual quality of The Bloc, to identify the many retail and commercial uses, and to serve a placemaking function, reinforcing The Bloc as a dynamic and diverse downtown destination in which to live, work, shop, or stay. The proposed Sign District includes a Conceptual Sign Plan, which is comprised of the Conceptual Sign District Drawings and Conceptual Sign District Summary Table. The Conceptual Sign Plan includes 17 wall signs, of which 14 are proposed as digital display signs and 3 are proposed as non-digital identification signs. The total proposed sign area of these wall signs is 21,043 square feet. Ten of the digital display signs would contain on-site content and four of the digital display signs would contain off-site advertising. The Conceptual Sign Plan also identifies three exterior digital kiosks (one floor mounted and two wall mounted) and 11 interior digital kiosks (six are floor mounted and five are wall mounted). These digital kiosks would identify tenants and serve to orient and direct visitors to the diverse uses at The Bloc and would include off-site advertising. Interior digital kiosks are not considered to be signs

because they are located at least 6 feet away from the exterior wall or edge of the building. All digital displays and digital kiosks would include static images. No signage would be permitted in the public right-of-way.

3.3.6 Sustainability Features

The Project would be designed and constructed to incorporate features to support and promote environmental sustainability. "Green" principles are incorporated within the Development Area to comply with the City of Los Angeles Green Building Code and the sustainability intent of the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED®) program to meet the standards of LEED Silver® or equivalent green building standards. These include energy conservation, water conservation, and waste reduction features to support and promote environmental sustainability, including but not limited to: Energy Star appliances; plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) that comply with the performance requirements specified in the City of Los Angeles Green Building Code; weather-based irrigation system; and water-efficient landscaping. Additionally, the Project would install a new storage tank with a submersible pump that would store stormwater runoff for use as drip irrigation for the planter areas on the upper and lower exterior amenity levels of the residential portion of the new building. As previously discussed, the tower façade would provide private balconies, which would also double as sun-shading structures to reduce solar heat gain at the building interior.

In addition, the Project would meet the City of Los Angeles Green Building Code Requirements for parking facilities capable of supporting future electric vehicle supply equipment (EVSE), as well as parking spaces equipped with electric vehicle (EV) charging stations. Pursuant to City of Los Angeles Ordinance 186,485 and Ordinance 186,488, 30 percent of the parking spaces in the Project would be capable of supporting future EVSE and 10 percent of spaces would include EV charging stations.

3.3.7 Site Security

The Project would include numerous security features, including a closed-circuit camera system as well as a dedicated security team for the residential tower. The Bloc's existing 24/7 on-site security personnel, regular perimeter patrols, and a closed-circuit camera system would continue as operated under existing conditions. The Project would also be designed such that entrances to and exits from building, open spaces around building, and pedestrian walkways would be open and in view of surrounding sites. In addition, buildings and walkways would be properly lit in order to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into the building. Parking areas would also be sufficiently lit to maximize visibility and reduce areas of concealment.

3.3.8 Anticipated Construction Schedule

Proposed signs would be installed approximately six months following the Sign District Project Permit Compliance approval and after all applicable sign permits are issued. Construction of the 53-story tower component would commence with the structural upgrade of the existing nine-story parking/retail podium building and subterranean levels below, and the demolition/reconfiguration of a portion of this building. In particular, new building foundations would be provided, which would require some grading and excavation. This would be followed by new building construction, concrete installation,

new building façades, and landscape installation. Project construction is anticipated to occur over an approximate 35-month period and would be completed in 2030. It is estimated that approximately 18,239 cubic yards of export would be hauled from the Project Site.

3.4 REQUESTED PERMITS AND APPROVALS

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

- Pursuant to Los Angeles Municipal Code (LAMC) **Section 14.5.6 A**, a Transfer of Floor Area Rights (TFAR) greater than 50,000 square feet of floor area for the transfer of up to 470,674 square feet of floor area from the Los Angeles Convention Center (Donor Site), located at 1201 South Figueroa Street, to be added to the Project Site (Receiver Site) with an existing 1,424,314 square feet, thereby permitting a total maximum of 1,894,988 square feet, or 10.15:1 FAR in lieu of the otherwise permitted existing nonconforming 7.63:1 FAR and the maximum 6:1 FAR permitted by the C2-4D Zone.

- Pursuant to **LAMC Section 16.05** approval of Site Plan Review for a project that adds more than 50 dwelling units.

- Pursuant to **Charter Section 562** and **LAMC Section 12.27 B**, the following Parking Variances:

  - **Relief from LAMC Section 12.21 A.4(p)(1)** to permit 0.946 parking spaces per residential unit in lieu of the 1.096 parking spaces per unit required by the LAMC. If all 466 residential units are constructed, a total of 441 parking spaces would be provided in lieu of the required 511 parking spaces. The Applicant requests a parking ratio (rather than a fixed number of spaces) for the required parking in order to correspond to the number of residential units actually built.

  - **Relief from LAMC Section LAMC 12.21 A.4 (p)(2), 12.21 A.4 (i)(1) and (i)(3)** to permit 1,507 hotel and commercial parking spaces, in lieu of the 1,636 hotel and commercial parking spaces required.

  - **Relief from LAMC 12.21 A.5** to allow 0.716 space per dwelling unit to be designed as standard spaces, in lieu of the requirement that one parking space per dwelling unit be designed as a standard space. If 466 units are constructed, this would provide for 334 standard spaces in lieu of 466 standard spaces. The remainder of the spaces provided could be compact spaces. The Applicant requests a parking ratio (rather than a fixed number of spaces) for the required standard sized parking spaces in order to correspond to the number of residential units actually built.

  - **Relief from LAMC 12.21 A.4(g)** to temporarily allow up to 1,050 required parking spaces to be provided off-site, located more than 750 feet from the Project Site, during project construction.

  - **Relief from LAMC 12.26 E.5** to temporarily allow up to 1,050 required parking spaces to be provided off-site through lease, in lieu of covenant, during project construction.

- Pursuant to **LAMC Sections 17.03 and 17.15**, approval of Vesting Tentative Tract Map (Tract No. VTT-83482) including the following:

  - Resubdivision and condominium purposes.

  - Creation of two (2) new airspace lots containing up to 466 residential condominium units.

  - In consideration of the project's proximity to jobs and Metro's 7th Street Rail station portal, a minimum of 0.946 parking spaces per dwelling unit, with zero (0) guest parking spaces, in lieu of compliance with the Deputy Advisory Agency's Parking Policy AA-2000-1 (which requires 2 residential parking spaces and 0.25 guest parking space per dwelling unit).

  - Waiver of an approximate 2-foot dedication to provide a 12-foot-wide sidewalk and a waiver of a 5-foot sidewalk easement on 8th Street required per the Downtown Street Standards plan.

  - Waiver of an approximate 5-foot sidewalk widening on Hope Street to provide a 15-foot sidewalk required per the Mobility Plan 2035 and a waiver of a 3-foot sidewalk easement required per the Downtown Street Standards plan.

  - Waiver of an approximate 2-foot sidewalk widening on 7th Street to provide a 12-foot wide sidewalk required per the Mobility Plan 2035.

  - Waiver of a dedication to provide 15-foot by 15-foot corner cut at the Southeast intersection of 7th Street and Flower Street.

  - Waiver of a dedication to provide 15-foot by 15-foot corner cut at the Southwest intersection of 7th Street and Hope Street.

  - Haul Route with the export of 18,239 cubic yards.

- Certification of the Final Environmental Impact Report ("EIR") for the Project.

- Pursuant to **LAMC Sections 12.32 S and 13.1**, establishment of a Sign Supplemental Use District, pursuant to existing Case No. CPC-2018-6388-SN, filed on October 31, 2018. The Applicant requests the establishment of The Bloc Supplemental Use District, a "SN" Sign District for the block bounded by Flower Street on the west, 8th Street on the south, Hope Street on the east, and 7th Street on the north.

- Approval by the City Board of Public Works for the Removal of Trees in the Public Right of Way.

- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, demolition, excavation, shoring, foundation,grading and building permits, tree removal permits, haul route approval, revocable permits, B-permit, and sign permits.

3.5 RESPONSIBLE PUBLIC AGENCIES

A Responsible Agency under CEQA is a public agency with some discretionary authority over a project or a portion of it, but which has not been designated the Lead Agency (CEQA Guidelines Section 15381). No responsible agencies have been identified for the Project.

4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

Senate Bill (SB) 743 [Public Resources Code (PRC) Section 21099(d)] sets forth guidelines for evaluating project transportation impacts under CEQA, as follows: "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." PRC Section 21099(a) defines a "transit priority area" (TPA) as an area within 0.5 mile of a "major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program or applicable regional transportation plan." PRC Section 21064.3 defines "major transit stop" as "a site containing any of the following: (a) [a]n existing rail or bus rapid transit station, (b) [a] ferry terminal served by either a bus or rail transit service, or (c) [t]he intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." PRC Section 21099 defines an "infill site" as a "lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses." This state law supersedes the aesthetic impact thresholds in the 2006 L.A. CEQA Thresholds Guide, including those established for aesthetics, obstruction of views, shading, and nighttime illumination.

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

PRC Section 21099 applies to the Project since the Project is a residential project located within 0.5 mile of a major transit stop. Therefore, the Project is exempt from aesthetic impacts. The aesthetic analysis in this Initial Study (or any aesthetic analysis that may subsequently be provided in the EIR) is for informational purposes only and not for determining whether the Project will result in significant impacts to the environment. The aesthetic impact analysis in this Initial Study (and any aesthetic analysis in the EIR) is included to discuss what aesthetic impacts would occur from the Project if PRC Section 21099(d) was not in effect. As such, nothing in the aesthetic impact discussion in this Initial Study (or in the EIR) shall trigger the need for any CEQA findings, CEQA analysis, or CEQA mitigation measures.

[10] City of Los Angeles Department of City Planning, ZI File ZA No. 2452, TPAs/Exemptions to Aesthetics and Parking Within TPAs Pursuant to CEQA.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c. In 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?	☐	☐	☐	☒

a. Would the project have a substantial adverse effect on a scenic vista?

No Impact. A scenic vista is a panoramic view of a valued visual resource.[11] Panoramic views or vistas provide visual access to a large geographic area, for which the field of view can be wide and extend into the distance. Panoramic views are typically associated with vantage points looking out over a section of urban or natural areas that provide a geographic orientation not commonly available. Examples of panoramic views include an urban skyline, valley, mountain range, the ocean, or other water bodies. Focal views are also relevant when considering this question from Appendix G of the CEQA Guidelines. Examples of focal views include natural landforms, public art/signs, historic buildings, and important trees.

The Downtown Los Angeles skyline is considered a scenic resource and in general views of the skyline may be considered scenic vistas. This skyline is visible from a number of observation points throughout the City and beyond its boundaries. For example, distant panoramic views of downtown Los Angeles are available from a variety of vantage points in the Hollywood Hills, which is located approximately 7 miles north of the Project Site. As described in Section 3, Project Description, of this Initial Study, the Project would develop a new 53-story high-rise tower, which will extend 41-stories above the 12-story parking/retail podium. The new tower would extend approximately 710 feet above grade as measured by the LAMC. Due to the presence of existing high-rise and mid-rise structures within the Project Site and on adjacent blocks, the Project Site has limited visibility from off-site public areas, and does not offer view corridors through the Project Site. Due to the dense urban

[11] City of Los Angeles, 2006 L.A. CEQA Thresholds Guide, p. A.2-1.

development surrounding the Project Site and vicinity, views of the Downtown skyline or other scenic vistas of visual resources, including the Hollywood Hills, are generally not available. As is the case under existing conditions, future views with implementation of the Project would continue to depict the highly urbanized downtown area. The Project's new tower would contribute to the downtown skyline views that are available from public rights-of-way and from other elevated portions of the City including the Hollywood Hills. However, despite the increase in building height and density that would result from the Project, the Project Site would generally look similar to the existing surrounding fabric of urban development. Overall, as the area is fully developed and highly urbanized, the Project would not have a substantial adverse effect on a publicly available scenic vista. Moreover, pursuant to Senate Bill 743 and ZI No. 2452, the Project's aesthetics impact would not be considered a significant impact on the environment. Therefore, no impact to scenic vistas would occur and no further evaluation of this topic is required.

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

No Impact. The Project Site is not located along a state scenic highway. The nearest state scenic highway is the California State Route 2 (SR-2), which is located approximately 13 miles northeast of the Project Site.[12] Therefore, the Project would not substantially damage scenic resources within a state scenic highway as no scenic highways are located adjacent to the Project Site. Moreover, pursuant to SB 743 and ZI No. 2452, the Project's aesthetics impact would not be considered a significant impact on the environment. Therefore, no impact to scenic resources would occur and no further evaluation of this topic is required.

c. In non-urbanized areas, would the project 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?

No Impact. The Project is located in an urbanized area. As such, this analysis focuses on whether the Project would conflict with applicable zoning and other regulations governing scenic quality.

With regard to zoning, as discussed in Section 3, Project Description, of this Initial Study, the Project Site has a General Plan land use designation of Regional Center Commercial with a corresponding zone of C2-4D (Commercial zone, Height District 4 with Development Limitation). The C2 zone permits a wide range of commercial uses, including office, retail, restaurant, and hotel uses, as well as any land use permitted in the R4 zone. The number "4" in the Project Site's zone designation of C2-4D denotes Height District 4 which allows a maximum FAR of 13:1. The "D" denotes the D Limitation, enacted under Ordinance 164,307 (Subarea 1915) effective January 30, 1989, which limits FAR to a maximum of 6:1 with some exceptions including the use Transfer of Floor Area Rights (TFAR). The Los Angeles Department of City Planning is currently in the process of updating the Central City Community Plan under the initiative known as the DTLA 2040 plan. A draft of the

[12] Caltrans, Scenic Highways, https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa, accessed March 25, 2022.

proposed General Plan land use designations has been released, placing the Project Site in the "Transit Core" designation. The proposed maximum FAR within the Transit Core ranges from 10:1 to 13:1.

As discussed in Section 3, Project Description, of this Initial Study, the Project would develop a 53-story high-rise tower which will extend 41-stories above the 12-story parking/retail podium. The residential uses and associated amenities would comprise approximately 495,016 square feet of floor area. Upon completion of the Project, the Project Site would include 1,894,988 square feet of floor area with an FAR of 10.15:1. The proposed Project complies with the unlimited height limit of the Project Site zoning, and would comply with the FAR limitations with approval of the requested Transfer of Floor Area Rights. As described in detail in Section 3, Project Description, several discretionary approvals are being sought to implement the Project in addition to Transfer of Floor Area Rights; these include Site Plan Review, Parking Variances, approval of several Waiver of Street and Corner Cut Dedications and Sidewalk Easements, a Vesting Tentative Tract Map, and a Sign Supplemental Use District and approval by the City Board of Public Works for the removal of street trees. With approval of the requested Transfer of Floor Area Rights, the Project would be consistent with applicable zoning regulations regarding scenic quality including those related to height and FAR.

With regard to the City's regulations governing scenic quality, local land use plans applicable to the Project Site also include policies governing scenic quality, including the Citywide General Plan Framework Element (Framework Element), the Central City Community Plan, Downtown Design Guide: Urban Design Standards and Guidelines (Downtown Design Guide), and the Citywide Urban Design Guidelines. The Project's lack of conflict and consistency with the general intent of these plans is briefly discussed below.

Citywide General Plan Framework Element

The City of Los Angeles General Plan Framework Element (Framework Element) provides direction regarding the City's vision for future development in the City and includes an Urban Form and Neighborhood Design Chapter to guide the design of future development. One of the key objectives of the Urban Form and Neighborhood Design Chapter is to enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm (Objective 5.5).[13] As described in Section 3, Project Description, of this Initial Study, the Project Site is currently occupied by The Bloc, a mixed-use development that includes hotel and commercial uses and associated parking, as well as a direct portal to the 7th Street/Metro Central rail station. Existing improvements include a high-rise hotel and commercial uses and an expansive plaza that includes the portal to the 7th Street/Metro Central rail station, all located within the northern portion of the Project Site, outside of the Development Area. The commercial uses consist of office, hotel, theater, retail, restaurant/bar, gym/fitness and medical office uses. The southern portion of the Project Site that comprises the Development Area is currently developed with an existing 9-story commercial podium building, which includes five stories of enclosed parking, four stories of existing retail floor area (one of which includes theater uses) and rooftop parking. The area surrounding the Project Site

[13] Los Angeles Department of City Planning, The Citywide General Plan Framework: An Element of the City of Los Angeles General Plan, Chapter 5, Urban Form and Neighborhood Design, re-adopted by City Council on August 8, 2001.

is highly urbanized and includes a mix of mid- to high-rise buildings containing a variety of uses, including commercial (retail and restaurant), multi-family residential, institutional, and parking uses.

The Project would enhance the built environment in the surrounding neighborhood and upgrade the quality of development by constructing a 53-story high-rise tower that incorporate design elements that would enhance the quality of the visual environment and complement its surroundings. The new tower, with a height of 710 feet would be designed as a slender point tower, addressing its relationship to surrounding towers and its access to views in all directions. The façade of the tower would be designed to maximize access to light and air through the use of perimeter balconies and floor to ceiling glass windows, which would promote inside/outside living. The top of the tower would be capped off with a spiraling, rose bud geometry, creating a distinct and unique rooftop within the Downtown skyline. Proposed materials, primarily glass and smooth white metal panels would emphasize the curvature and flowing lines of the tower. Overall, the proposed development would be designed in a contemporary architectural style that would be compatible with the general urban characteristics of the surrounding neighborhood.

The new tower would also incorporate a variety of exterior and interior residential common open space amenities on Levels 12 and 51. Specifically, the Amenity Level located on the podium roof (Level 12), would contain a variety of residential amenities including a pool deck, lounge areas, and picnic areas with tables and seats would be provided. A total of 8,000 square feet of interior amenity rooms would be provided on this level which may contain multi-purpose space, lounge areas, co-working areas, and/or a fitness area. Furthermore, additional lounge and picnic areas as well as interior multi-purpose space would be provided on the roof level of the tower (Level 51).

Additionally, the Project would enhance the streetscape. Specifically, the Project would improve the pedestrian experience along Hope Street by providing enhanced sidewalk paving along a 190-foot portion of Hope Street as shown on the landscape plans. The new trees, within the enhanced sidewalk area, would be located within landscape tree wells. Project lighting for the residential use would incorporate low-level exterior lights on the building and along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage, architectural features, and landscaping elements would be incorporated within the Development Area to provide for efficient and effective lighting solutions that minimize light trespass from the site. The Project proposes a Sign Supplemental Use District (Sign District) for signage that would include digital display signage, non-digital identification signs, exterior digital kiosks, and interior digital kiosks. Sign illumination associated with the proposed signage would comply with LAMC light trespass requirements and would be designed to be aesthetically compatible with the proposed architecture of the Project and its surroundings. In order to promote active and pedestrian friendly streets, the Project will include storefronts for the new residential lobby and retail space along Hope Street on a façade wall that is currently blank. The Project will be designed to promote pedestrian activation along Hope Street, where the main entrance to the new residential lobby will be located. The residential entry will be accentuated and differentiated from the retail and plaza entries along the same frontage with a clear glass storefront, accentuated doorframe with a colored metal trim. A stone-like material would clad the columns adjacent to the residential entry. The relocated retail and relocated plaza pedestrian entrances along Hope Street will be clearly marked with the storefront doors, glazing, lighting and signage. The high quality finish materials of the ground level façade and storefronts will create interest at the pedestrian scale.

Overall, the Project would be generally consistent with the applicable objectives and policies that support the goals set forth in the Framework Element's Urban Form and Neighborhood Design Chapter and, therefore, would not conflict with the Framework Element policies regarding scenic quality.

Central City Community Plan

As it relates to scenic quality, the Central City Community Plan includes the following policy:

- Preserve and enhance Central City's primary pedestrian-oriented streets and sidewalks and create a framework for the provision of additional pedestrian friendly streets and sidewalks which complement the unique qualities and character of the communities in Central City.

The Project would activate the ground floor along Hope Street by introducing a residential lobby. Additionally, the Project would enhance Hope Street adjacent to the Project Site by providing enhanced sidewalk paving and five new street trees in landscape tree wells within a 190-foot portion of Hope Street. Therefore, the Project would not conflict with the Central City Community Plan's policy related to scenic quality.

Downtown Design Guide: Urban Design Standards and Guidelines

The Downtown Design Guide, revised and adopted in June 2017, supplements the General Plan Framework Element, Central City Community Plan, and LAMC in promoting high quality design and architecture while preserving the character and scale of Downtown Los Angeles.

As previously discussed, the Project would complement and enhance the built environment in the surrounding neighborhood. Specifically, the proposed 53-story tower, with a height of 710 feet would be designed as a slender point tower, addressing its relationship to surrounding towers and its access to views in all directions. The façade of the tower would be designed to maximize access to light and air through the use of perimeter balconies and floor to ceiling glass windows, which would promote inside/outside living. Proposed materials, primarily glass and smooth, white metal panels, emphasize the curvature and flowing lines of the tower. The presence of a warmer, bronze like material at select double height balcony soffits serve as accents to the tower. At the base, where the stem of the proposed tower transitions into the podium, an enclosed shared amenity space surrounds the building stem and then gives way to an expansive green roof top terrace. The roof terrace acts as both an outdoor amenity for residential occupants, as well as a visually attractive feature easily viewed from the surrounding high-rise buildings.

The Project would activate the ground floor along Hope Street by introducing a residential lobby in areas of the Project Site that are currently not being utilized. The Project would also provide five new street trees in landscape tree wells within a 190-foot portion of Hope Street adjacent to the Project Site, further activating the streetscape and improving the pedestrian environment.

The primary vehicular access to the site would continue to be provided from existing vehicular ingress/egress driveways at the southern portion of the Project Site, along Hope Street, 8th Street, and Flower Street. Two existing ingress/egress driveways provide primary access points along

Flower Street and Hope Street and lead to the existing parking structure through a circular ramp that services the overall complex. The circular ramp at the corner of 8th and Hope Streets includes a driveway that provides ingress into the parking garage. At the circular ramp located at the corner of Flower and 8th Streets, an existing egress driveway is located along 8th Street. An additional loading driveway is located at the mid-block area of 8th Street that accesses subterranean Level B which includes a loading area. Two additional existing vehicular driveways are located mid-block along Hope Street, servicing the hotel use for pick-up and drop-off and valet parking purposes. The existing driveways would remain unchanged and two driveways fronting along 7th Street and Hope Street, near 8th Street, would incorporate pedestrian warning systems.

Project lighting for the residential use would incorporate low-level exterior lights on the building and along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage, architectural features, and landscaping elements would be incorporated within the Development Area to provide for efficient and effective lighting solutions that minimize light trespass from the site. Outdoor lighting sources would be shielded away from adjacent properties as necessary to minimize impacts. Proposed signage would be designed to be aesthetically compatible with the architecture of the building and its surroundings. As discussed above, the Project would implement a Sign District that would include digital display signage, non-digital identification signs, exterior digital kiosks and interior digital kiosks. Proposed signage would comply with the light trespass requirements of the LAMC, the California Code of Regulations, Title 24 and applicable provisions of the California Vehicle Code.

The Downton Design Guide contains provisions that address signage and is intended to provide design guidance to achieve visually effective and attractive signage throughout downtown. However, the Downtown Design Guide expressly acknowledges that it does not supersede conflicting regulations of a signage Supplemental Use District (See § § 1.C,10.C). As a Supplemental Use District approved by ordinance, the Sign District would be a land use legislative act that would supersede all conflicting City plans and codes, other than the City of Los Angeles General Plan, including without limitation the LAMC and the Design Guide. Any provisions in an adopted Sign District that are different from, more restrictive than, or more permissive than permitted by the LAMC or Downtown Design Guide, shall prevail and supersede the other applicable provisions. Accordingly, because the Project consists of a proposed signage Supplemental Use District that would provide regulations and requirements to govern the proposed signage, any conflicting signage provisions of the Downtown Design Guide would not be applicable. The extent to which the proposed Sign District would implement or supersede provisions in the Downtown Design Guide related to signage is discussed below.

The Sign District would implement the intent of the standards of the Design Guide with respect to signs located between 14 feet above sidewalk elevation and 40 feet above sidewalk elevation. The Sign District would permit Signs BDE-04, BDE-07, BDE-08, BDE-09, BDE-10, and BDE-17 would be located within the 14- to 40-foot zone above the adjacent sidewalk. The signs are located on street corners and over the vehicular driveways where no street trees exist. Therefore, there would be no conflict with the existing/planned street trees and the proposed signs within the 14- to 40-foot zone.

The Sign District would supersede the Design Guide standards with respect to Identification Signs and Digital Display/Identification Signs (referred to as “Tall Building” signs in the Design Guide) as the Sign District would permit signs that are larger than the maximum size specified by the Design Guide.

The Design Guide's maximum allowed sign area for tall building signs is 50 percent of the area in which the sign may be located on a single building face or 800 square feet, whichever is less and provides for only a single line of text.[14] There are three proposed Digital Display/Identification Signs that are digital and may include multiple lines of text. Two are located on the roof level of the office tower. The size of the first sign, BDE-11 is 1,792 square feet (112 feet by 16 feet) and faces 8th Street, and the second sign, BDE-12, is 3,200 square feet (200 feet by 16 feet) and faces Hope Street. The third sign, BDE-13, is located on the hotel tower facing 7th Street and is 702.5 square feet (62 feet 0 inches by 11 feet 4 inches) in size. Signs BDE-11 and BDE-12 encompass the full width of the façade on which it is located which is greater than the maximum façade coverage and maximum sign size allowed. Sign BDE-13 has a greater façade coverage than allowed.

The Design Guide provides a limit of no more than two Tall Building Signs on any two sides of the building. The proposed signage on the Office Tower and Hotel Tower comply with this standard. However, the Sign District proposes three non-digital Identification Signs on the residential tower facing 7th Street, Flower Street, and 8th Street. he proposed Sign District would supersede the limit on Tall Building Signs to allow these signs, but would nonetheless implement the spirit and intent of the Downtown Design Guide, as the three non-digital Identification Signs at the top of the new 53-story tower are appropriate for the size and scale of the building.

Overall, the Project would generally be consistent with the applicable standards and guidelines established by the Downtown Design Guide that include sidewalk and setbacks, parking and access, massing and street wall, on-site open space and landscaping, architectural detail, street improvements and, therefore, would not conflict with applicable Downtown Design Guide policies regarding scenic quality.

Citywide Urban Design Guidelines

The Citywide Design Guidelines, adopted October 24, 2019, establish 10 guidelines to implement out common design objectives that maintain neighborhood form and character while promoting quality design and creative infill development solutions. Although each of the Citywide Design Guidelines should be considered in a project, not all will be appropriate in every case. The Project would not conflict with the Citywide Design Guidelines, as discussed below.

Guideline 1: Promote a safe, comfortable and accessible pedestrian experience for all

The Project would enhance the streetscape adjacent to the Project Site by implementing a design that would enhance the pedestrian experience. Specifically, to improve the streetscape, the Project would provide enhanced sidewalk paving and five new street trees in landscape tree wells within a 190-foot portion of Hope Street. In addition, the residential lobby placement on Hope Street and a relocated retail storefront would also activate the streetscape by introducing a new use to an area of the existing ground floor that is not currently utilized. Project lighting would incorporate low-level exterior lights on

[14] The Design Guide (page 52) indicates that Tall Building Signs must be located between the top of the windows on the topmost floor and the top of the roof parapet or within an area 16 feet below the top of the roof parapet. On buildings with stepped, non-flat, or otherwise articulate tops, Tall Building Signs may be located within an area 16 feet below the top of the building or within an area 16 feet below the top of the main portion of the building below the stepped or articulated top.

the building and along pathways for security and wayfinding purposes. Low-level lighting to accent signage would be featured on the Project Site and architectural features and landscaping elements would be incorporated within the Development Area to provide for efficient and effective lighting solutions that minimize light trespass from the site. Further, no new on-site driveways will be introduced and two driveways fronting along 7th Street and Hope Street, near 8th Street, would incorporate pedestrian warning systems. These Project elements would promote a safe, comfortable, and accessible pedestrian experience for all.

Guideline 2: Carefully incorporate vehicular access such that it does not degrade the pedestrian experience

The primary vehicular access to the Project Site would continue to be provided from existing vehicular ingress/egress driveways at the southern portion of the Project Site, along Hope Street, 8th Street, and Flower Street. Two existing ingress/egress driveways provide primary access along Flower Street and Hope Street and lead to the existing parking structure through a circular ramp that services the overall complex. The circular ramp at the corner of 8th and Hope Streets includes a driveway that provides ingress into the parking garage. At the circular ramp located at the corner of Flower and 8th Streets, an existing egress driveway is located along 8th Street. An additional loading driveway is located at the mid-block area of 8th Street that accesses subterranean Level B which includes a loading area. An existing porte cochere are located mid-block along Hope Street, servicing the hotel use for pick-up and drop-off and valet parking purposes. The existing driveways will remain unchanged and two driveways fronting along 7th Street and Hope Street, near 8th Street, would incorporate pedestrian warning systems.

Guideline 3: Design projects to actively engage with streets and public space and maintain human scale

The Project would activate the ground floor along Hope Street by introducing a residential lobby and a relocated retail space with new storefront entries accessible from the sidewalk, One of the existing pedestrian passageways along Hope Street will be enhanced and relocated to the north to accommodate the residential lobby and retail storefront. The Project will retain the three other existing pedestrian passageways, one on Hope Street and the other two along Flower Street. The four pedestrian passageways and the main pedestrian entry to The Bloc along 7th Street provide connections to the variety of uses within The Bloc, access to other streets, and access to the Bloc's onsite portal to the 7th/Metro Center rail station. The main pedestrian entry to the Project Site, along 7th Street, is an open air entry court that leads to a below grade open-air plaza that is the central element of the Existing Development and contains access to most of the retail, restaurant and fitness uses. The main pedestrian entry on 7th Street also provides pedestrian access to the office tower, medical office, Alamo Drafthouse, and other uses through walkways on either side of the opening to the below grade open-air plaza.

The Project would include enhanced sidewalk paving and five new street trees in landscape tree wells within a 190-foot portion of Hope Street,adjacent to the Project Site, further activating the streetscape and improving the pedestrian environment. Overall, the Project would be designed to actively engage with streets and public space and maintain human scale.

Guideline 4: Organize and shape projects to recognize and respect surrounding context

The area surrounding the Project Site is highly urbanized and includes a mix of mid- to high-rise buildings containing a variety of uses, including commercial (retail and restaurant), multi-family residential, institutional, and parking uses. Properties immediately adjacent to the Project Site are zoned C2-4D with a Regional Center Commercial land use designation. Properties to the north of the Project Site along 7th Street are developed with the mid-rise Roosevelt Lofts and 655 Hope Condos adaptive reuse buildings. These multi-story, mixed-use buildings contain ground floor commercial uses that include various dining establishments. Properties to the south of the Project Site along West 8th Street are improved with two multi-story mixed-use buildings with ground floor commercial uses (8th+Hope Apartments and the Gas Company Lofts). Properties to the east of the Project Site along South Hope Street are improved with mid-rise commercial and retail building, a small religious structure (the Third Church of Christ, Scientist of Los Angeles), and parking facilities.[15] Properties to the west of the Project Site along Flower Street are improved with two multi-story parking garages, a surface parking lot, and a multi-story office building with ground floor commercial uses that include dining establishments. In addition, construction of a 41-story mixed-use building is underway at the intersection of Figueroa Street and 8th Street. In the Project vicinity, beyond these land uses are numerous high-rise commercial and residential buildings that form the Downtown skyline. The Project would be designed to be compatible with the general urban characteristics of the surrounding neighborhood. The new tower, with a height of 710 feet would be designed as a slender point tower, addressing its relationship to surrounding towers and its access to views in all directions. The façade of the tower would be designed to maximize access to light and air through the use of perimeter balconies and floor to ceiling glass, which would promote inside/outside residential living. The top of the tower would be capped off with a spiraling rose bud geometry, creating a distinct and unique rooftop within the Downtown skyline. Proposed materials, primarily glass and smooth white metal panels, emphasize the curvature and flowing lines of the tower.

Guideline 5: Express a clear and coherent architectural idea

The proposed residential tower would be designed to complement adjacent structures. While the new tower will be a separate building with a total of 53 stories, the first 12 stories will be enclosed within the retail/parking podium building, which will be increased from nine to 12 stories, and, thus, the new tower and podium building will appear to be an integrated building, consisting of a 41-story tower that extends above the 12-story podium. Strong horizontal design elements would be incorporated in both the new tower and the existing podium building, which provide continuity and tie the slender point tower and the rectangular podium building together as one cohesive building. The new tower's alternating horizontal bands of white metal and clear neutral glass relate to the podium building's horizontal bands comprised of perforated screen enclosing the two new parking levels at the top of the podium, a masonry podium façade with rectangular punched openings organized in a regular grid pattern at the podium's middle portion, large format masonry tile cladding with a running bond pattern below the mid-point of the podium as measured from adjacent grade, and the recessed masonry on the ground level which include storefronts. The white large format masonry horizontal band and the white cornice at the top of the podium relate to the new tower's metal bands along the balconies. The new tower's white metal and clear neutral glass express horizontal banding in a manner that contrasts

[15] A portion of this property is proposed to be redeveloped with a 50-story mixed-use development with 580 residential dwelling units and ground level commercial uses, per Case No. CPC-2017-505-TDR-ZV-SPPA-DD-SPR.

with the rectangular masonry podium building that serves as a solid base to the light point tower. At the new entry along Hope Street, the dark granite would tie into the colors of both the existing hotel and office towers on-site, while the bronze accents both at the entry and tower mullions relate back to the newer metal work recently installed at the Sheraton Hotel's porte cochere. The tower materials and color, white metal and clear neutral glass, intentionally contrast the other two towers within the block, but tie back to the recently refurbished storefront elements found at street level, including the storefront frames and metal panels of Uniqlo, LA Fitness and the post office at Flower and 7th streets. The terracotta soffit finishes of the tower act as an accent material to give warmth to the new tower which contrasts with the otherwise dark and monochromatic palette of the existing hotel and office towers within The Bloc development. The Project also proposes a Sign District for signage that would include digital display signage, non-digital identification signs, and exterior digital kiosks, as well as interior digital kiosks that include both on-site and off-site content and orient and direct visitors to the diverse uses at The Bloc.

Guideline 6: Provide amenities that support community building and provide an inviting, comfortable user experience

As previously discussed, the Project would enhance the streetscape adjacent to the Project Site by installing enhanced sidewalk paving and five new street trees in landscape tree wells within a 190-foot portion of Hope Street. The Project would also provide approximately 41,250 square feet of residential exterior open space consisting of a variety of amenities, such as a pool deck, lounge areas, and picnic areas with tables and seats on the podium level (Level 12). Furthermore, a total of 8,000 square feet of interior residential amenity rooms would be provided on this level, and would include amenities such as a multi-purpose space, lounge areas, co-working areas, and a fitness area. On the roof level of the tower (Level 51), approximately 3,500 square feet of exterior open space consisting of amenities, such as lounge and picnic areas, and 2,000 square feet of interior multi-purpose space would be provided. The residential tower amenities will create inviting recreation spaces for residents and their guests. In addition, Project lighting would incorporate low-level exterior lights on the building and along pathways for security and wayfinding purposes. Low-level lighting to accent signage, architectural features, and landscaping elements would be incorporated within the Development Area to provide for efficient and effective lighting solutions that minimize light trespass from the Project Site.

Guideline 7: Carefully arrange design elements and uses to protect site users

The Project includes the development of a 53-story high-rise residential tower consisting of 41 stories extending above a 12-story parking/retail podium. As discussed in Section 3, Project Description, of this Initial Study, the Project Site is bound by Flower Street to the west, South Hope Street to the east, West 8th Street to the south, and 7th Street to the north. The new residential tower would be located on the southern portion of the Project Site and would be compatible with the existing office tower, high-rise hotel, parking/retail podium uses, and an expansive plaza that includes the portal to the 7th Street/Metro Central rail station, all located within the northern portion of the Project Site. All existing driveways near the corners of 8th, Flower, and Hope Streets remain unchanged, and two driveways fronting along 7th Street and Hope Street, near 8th Street, would incorporate pedestrian warning systems. The Project would also include lighting along the building and pathways to provide for pedestrian orientation.

Guideline 8: Protect the site's natural resources and features

The Project Site is located in an urbanized area and is currently occupied by The Bloc, a mixed-use building that includes hotel and commercial uses and associated parking, as well as a direct portal to the 7th Street/Metro Central rail station. Existing landscaping adjacent to the Project Site includes 25 right-of-way trees. As discussed further below, the Project would remove five right-of-way trees along Hope Street, none of the trees in the adjacent public right-of-way are considered protected species by the City.[16] Five new replacement right-of-way trees in landscape tree wells are proposed within a 190-foot portion of Hope Street.

Guideline 9: Configure the site layout, building massing and orientation to lower energy demand and increase the comfort and well-being of users

The Project would introduce new residential uses to a site that is developed with existing hotel, commercial and parking uses and includes the portal to the 7th Street/Metro Central rail station,. In addition, as discussed in Section 3, Project Description, of this Initial Study, the Project would be designed and constructed to incorporate features to support and promote environmental sustainability. "Green" principles are incorporated within the Development Area to comply with the City of Los Angeles Green Building Code and the sustainability intent of the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED®) program to meet the standards of LEED Silver® or equivalent green building standards. Such features include energy conservation, water conservation, and waste reduction features to support and promote environmental sustainability, including but not limited to: Energy Star appliances; plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) that comply with the performance requirements specified in the City of Los Angeles Green Building Code; weather-based irrigation systems; and water-efficient landscaping. The Project would also utilize sustainable planning and building strategies, such as providing bicycle parking as well as providing EV charging stations and facilities capable of supporting future electric vehicle supply equipment, providing passive shading with the balconies, and drip irrigation, and would incorporate the use of environmentally friendly materials wherever applicable. Thus, the Project would support this goal of reducing energy demand.

Guideline 10: Enhance green features to increase opportunities to capture stormwater and promote habitat

The Project would be required to comply with the City's Low Impact Development (LID) ordinance and implement standard erosion controls to limit stormwater runoff. As part of these requirements, the Project would manage stormwater through a capture and reuse system. The Project would install a new storage tank with a submersible pump and would be designed to store stormwater runoff for use as drip irrigation for the planter areas on upper and lower levels of the new tower building. In the case that the proposed system becomes overwhelmed by the storm event, the collected runoff would discharge to an approved discharge point in the public right-of-way.

Overall, the Project would be generally be consistent with the applicable Citywide Design Guidelines and, therefore, would not conflict with the policies regarding scenic quality.

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[16] Carlberg Associates, City of Los Angeles Tree Inventory Report—The Bloc, 700 S. Flower Street, 700 W. 7th Street, and 711 S. Hope Street, Los Angeles, California 90017, May 26, 2022. See Appendix IS-2 of this IS.

In summary, for all the foregoing reasons, the Project would not conflict with applicable zoning and other regulations governing scenic quality.

Pursuant to Senate Bill 743 and ZI No. 2452, the Project's aesthetics impact would not be considered a significant impact on the environment. Therefore, no impacts would occur and no further evaluation of this topic EIR is required.

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

No Impact. Nighttime illumination of varying intensities is characteristic of most urban land uses, including those in the Project area. New light sources introduced by a project may increase ambient nighttime illumination levels. Additionally, nighttime spillover of light onto adjacent properties has the potential to interfere with certain functions, including vision, sleep, privacy, and general enjoyment of the natural nighttime condition. The significance of the impact depends on the type of use(s) affected, proximity to the affected use(s), the intensity of the light source, and the existing ambient light environment. Uses considered sensitive to nighttime light include, but are not limited to, residential, some commercial and institutional uses, and natural areas.

Glare occurs during both daytime and nighttime hours. Daytime glare is caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass or reflective materials, and, to a lesser degree, from broad expanses of light-colored surfaces. Daytime glare generation is common in urban areas and is typically associated with mid- to high-rise buildings with exterior façades largely or entirely comprised of highly reflective glass or mirror-like materials from which the sun can reflect, particularly following sunrise and prior to sunset. Daytime glare generation is typically related to sun angles, although glare resulting from reflected sunlight can occur regularly at certain times of the year. Glare can also be produced during evening and nighttime hours by artificial light directed toward a light-sensitive land use.

Construction

While the majority of Project construction would occur during daylight hours, there is a potential that construction could occur in the evening hours and require the use of artificial lighting, particularly during the winter season when daylight is no longer sufficient earlier in the day. Outdoor lighting sources, such as floodlights, spot lights, and/or headlights associated with construction equipment and hauling trucks, typically accompany nighttime construction activities. To the extent evening construction includes artificial light sources, such use would be temporary and would cease upon completion of Project construction. Furthermore, construction-related illumination would be used for safety and security purposes only, in compliance with LAMC light intensity requirements.[17] Additionally, as part of the Project, construction lighting would be shielded to minimize the potential for light spillover to adjacent properties. Project construction lighting, while potentially bright, would be focused on the particular area undergoing work.

[17] LAMC Chapter 9, Article 3, Section 93.0117(b) provides that no exterior light source may cause more than 2 foot-candles (21.5 lx) of light intensity or generate direct glare onto exterior glazed windows or glass doors; elevated porch, deck, or balcony; or any ground surface intended for uses such as recreation, barbecue or lawn areas or any property containing a residential unit or units.

Daytime glare could potentially occur during construction activities if reflective construction materials are positioned in highly visible locations where the reflection of sunlight could occur. However, any glare would be highly transitory and short-term, given the movement of construction equipment and materials within the construction area, and the temporary nature of construction activities. In addition, large, flat surfaces that are generally required to generate substantial glare are typically not an element of construction activities. Therefore, any daytime or nighttime glare associated with Project construction activities would be minimal and temporary in nature.

Based on the above, light and glare associated with temporary Project construction activities would not substantially alter the character of off-site areas surrounding the Project Site or adversely impact day or nighttime views in the area. Pursuant to SB 743 and ZI No. 2452, the Project's aesthetics impacts would not be considered significant.

Operation

The Project would introduce new light sources within the Project Site, including interior building lighting, exterior security lighting, exterior architectural lighting, and signage lighting. Project lighting would incorporate low-level exterior lights on the building and along pathways for security and wayfinding purposes. Low-level lighting to accent signage would be featured on the Project Site and architectural features and landscaping elements would be incorporated within the Development Area to provide for efficient and effective lighting solutions that minimize light trespass from the site. thereby reducing sky-glow and improving nighttime visibility through glare reduction. Outdoor lighting sources would be shielded away from adjacent properties to minimize impacts. All lighting would comply with current energy standards and regulations, as well as design requirements. All exterior and interior lighting would meet high energy efficiency requirements utilizing light-emitting diode (LED) or efficient fluorescent lighting technology. Any new street and pedestrian lighting within the public right-of-way would comply with applicable City regulations. In addition, all lighting would comply with light trespass requirements established by the LAMC and as measured at the property line of the nearest residentially zoned property.

As discussed above, the Project would implement a Sign District that would include digital display signage, non-digital identification signs, exterior digital kiosks and interior digital kiosks. In accordance with the LAMC, light trespass from all digital displays would be below 3.0 footcandles at existing and proposed residential uses in the immediate area. In addition, lighting associated with signage would also comply with California Vehicle Code Section 21466.5, which regulates light sources that may cause glare and impair the vision of drivers.

Daytime glare can result from sunlight reflecting from a shiny surface that would interfere with the performance of an off-site activity, such as the operation of a motor vehicle. Reflective surfaces can be associated with window glass and polished surfaces, such as metallic trim. In general, sun reflection that has the greatest potential to interfere with driving occurs from the lower stories of a structure. Sun reflection from the Project would occur during periods in which the sun is low on the horizon and when the point of reflection within the Project Site is in front of the driver, in the direction of travel. The Project would feature a variety of surface materials, including glass, concrete, and metal. As part of the Project, glass used in building façades would include high-performance coatings and the building shape would be designed to minimize glare from reflected sunlight.

Nighttime glare could result primarily from on-site illumination and vehicle headlights. As discussed above, the Project's illuminated signs would not exceed the prescribed LAMC requirements for light trespass or the California Vehicle Code provisions regulating light sources that may cause glare and impair the vision of drivers. Furthermore, while headlights from vehicles entering and exiting the Project Site would be visible during the evening and nighttime hours, such lighting sources would be typical for the area and similar to existing conditions in the area. Additionally, as discussed above, the rooftop parking level of the existing nine-story parking/retail podium building would be enclosed, and two additional enclosed levels of parking would be added. Therefore, the parking levels would be fully enclosed and therefore vehicle movements would be screened from view. Thus, nighttime glare would not result in a substantial adverse impact.

Based on the above, with adherence to regulatory requirements, lighting associated with Project operation would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Pursuant to SB 743 and ZI No. 2452, there would be no impact from the Project's aesthetic impacts associated with substantial light and glare. No further evaluation of this topic is required.

II. AGRICULTURE AND FOREST RESOURCES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

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

No Impact. The Project Site is located in an urbanized area of the City. As discussed in Section 3, Project Description, of this Initial Study, the Project Site is currently developed with hotel and commercial uses and associated parking as well as a direct portal to the 7th Street/Metro Central rail station. No agricultural uses or operations occur on-site or in the vicinity of the Project Site. Furthermore, the Project Site and surrounding area are not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency Department of Conservation.[18,19] As such, the Project would not convert farmland to a non-agricultural use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic is required.

b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The Project Site is zoned as C2-4D (Commercial, Height District 4 Development Limitation). Pursuant to the LAMC, the C2 Zone permits commercialuses, including retail with limited manufacturing, service stations and garages, retail contractor business, churches, schools, auto sales, and R4 (multiple dwelling) uses, among others. The Project Site is not zoned for agricultural use. Furthermore, no agricultural zoning is present in the surrounding area. Additionally, the Project

[18] City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APNs 5144-010-401, -405, -408, -421, -422, -423, and -425.

[19] California Department of Conservation, California Important Farmland Finder, https://maps.conservation.ca.gov/DLRP/CIFF/App/index.html?marker=-118.29152006048791%2C34.02551004278704%2C%2C%2C%2C&markertemplate=%7B%22title%22%3A%22%22%2C%22longitude%22%3A-118.29152006048791%2C%22latitude%22%3A34.02551004278704%2C%22isIncludeShareUrl%22%3Atrue%7D&level=14, accessed March 25, 2022.

Site and surrounding area are not subject to a Williamson Act Contract.[20] Therefore, the Project would not conflict with any zoning for agricultural uses or a Williamson Act Contract. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic is required.

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

No Impact. As previously discussed, the Project Site is located in an urbanized area and is currently zoned for commercial uses. The Project Site does not include any forest land or timberland and is not zoned as forest land or timberland.[21] Therefore, the Project would not conflict with existing zoning for, or cause the rezoning of, forest land or timberland. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic is required.

d. Would the project result in the loss of forest land or conversion of forest land to non-forest use?

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

e. Would the project 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. As discussed above, the Project Site is located in an urbanized area of the City and does not include farmland or forest land. Furthermore, the Project Site and surrounding area are not mapped as farmland or forest land, are not zoned for farmland/agricultural use or forest land, and do not contain any agricultural or forest uses.[22] As such, the Project would not result in the conversion of farmland to non-agricultural use or in the conversion of forest land to non-forest use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic is required.

III. AIR QUALITY

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

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20 California Department of Conservation, The Williamson Act Status Report 2016–17, August 2019.

21 City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APNs 5144-010-401, -405, -408, -421, -422, -423, and -425.

22 City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APNs 5144-010-401, -405, -408, -421, -422, -423, and -425.

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

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

Potentially Significant Impact. The Project Site is located within the 6,700-square-mile South Coast Air Basin (Basin). Within the Basin, the South Coast Air Quality Management District (SCAQMD) is required, pursuant to the federal Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in non-attainment (i.e., ozone, particulate matter less than 2.5 microns in size [$PM_{2.5}$], and lead[23]). SCAQMD's 2016 Air Quality Management Plan (AQMP) contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG). SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment.[24] With regard to future growth, SCAG has prepared the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which provides population, housing, and employment projections for cities under its jurisdiction.[25] The growth projections in the RTP/SCS are based on growth projections in local general plans for jurisdictions in SCAG's planning area. Construction and operation of the Project may result in an increase in stationary and mobile source air emissions. As a result, development of the Project could have a potential adverse effect on SCAQMD's implementation of the AQMP. Therefore, further evaluation of the Project's potential conflicts with the AQMP will be included in the EIR.

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23 Partial Nonattainment designation for lead for the Los Angeles County portion of the South Coast Air Basin only.

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

25 As of September 3, 2020, the 2020 RTP/SCS is the adopted Regional Transportation Plan for the region. However, it has not been incorporated into the applicable AQMP for the region. As such, analysis of consistency with growth forecasts in the applicable plan (2016 AQMP) are measured against the 2016–2040 RTP/SCS.

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

Potentially Significant Impact. As discussed above, construction and operation of the Project could result in the emission of air pollutants in the Basin, which is currently in non-attainment of federal air quality standards for ozone, PM2.5 and lead, and state air quality standards for ozone, particulate matter less than 10 microns in size (PM10), and PM2.5. As a result, implementation of the Project could potentially contribute to air quality impacts, which could cause a cumulative impact in the Basin. Therefore, further evaluation of the Project's potential cumulative air pollutant emissions will be included in the EIR.

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. As discussed above, the Project could result in increased short- and long-term air pollutant emissions from the Project Site during construction (short-term) and operation (long-term). Sensitive receptors located in the vicinity of the Project Site include residential uses and educational uses (such as SEA Charter High School). Therefore, further evaluation of the Project's potential to result in substantial adverse impacts to sensitive receptors will be included in the EIR.

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

Less Than Significant Impact. No objectionable odors are anticipated as a result of either construction or operation of the Project. Specifically, construction of the Project would involve the use of conventional building materials typical of construction projects of similar type and size. Any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people. With respect to Project operation, according to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project would not involve operation of these uses. In addition, on-site trash receptacles would also be contained, located, and maintained in a manner that promotes odor control, and would not result in substantially adverse odor impacts.

Construction and operation of the Project would also comply with SCAQMD Rules 401, 402, and 403, regarding visible emissions violations.[26] In particular, Rule 402 provides that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.[27]

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[26] SCAQMD, Visible Emissions, Public Nuisance, and Fugitive Dust, www.aqmd.gov/home/rules-compliance/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust, accessed March 25, 2022.

[27] SCAQMD, Rule 402, Nuisance, adopted May 7, 1976.

Based on the above, the Project would not result in other emissions such as those leading to odors. Impacts during construction and operation of the Project would be less than significant, and no mitigation measures are required. No further evaluation of this topic is required.

IV. BIOLOGICAL RESOURCES

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

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

Less Than Significant. The Project Site is located in an urbanized area and is currently developed with hotel and commercial uses and associated parking as well as a direct portal to the 7th Street/ Metro Central rail station. According to the Tree Inventory Report prepared for the Project, dated May 26, 2022, and included in Appendix IS-1 of this Initial Study,[28] there are 25 right-of-way trees. There are no private property trees associated with the Project Site. As indicated in the Tree Inventory Report, five of the 25 right-of-way trees on Hope Street would be removed as part of the Project and replaced in compliance with applicable City requirements. All other street trees would be avoided or preserved in place.

Due to the urbanized and disturbed nature of the Project Site and the surrounding areas, and lack of large expanses of open space areas, species likely to occur on-site are limited to small terrestrial and avian species typically found in urbanized developed settings. Due to the lack of onsite habitat it is unlikely any special status species listed by the California Department of Fish and Wildlife (CDFW)[29] or by the U.S. Fish and Wildlife Service (USFWS)[30] would be present on-site. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area as defined by the City.[31] However, although unlikely, the existing trees could potentially provide nesting sites for migratory birds. The Project would comply with the Migratory Bird Treaty Act (MBTA), which prohibits the take, possession, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, of any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid permit issued pursuant to federal regulations. Additionally, California Fish and Game Code Section 3503 states that "[i]t is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto." While the Project would require the removal of five existing trees, which could potentially provide nesting sites for migratory birds, compliance with the MBTA, California Fish and Game Code, and standard construction processes during nesting season would ensure that construction activities would not adversely affect nesting sites. Any tree removal would be minimized and performed outside of the bird nesting season (typically February 1 to August 31) to the extent feasible. In the event removal of trees must be conducted during the bird nesting season, a biological monitor would be present during the removal activities to ensure that no active nests would be impacted. In the event active nests are found, a buffer would be established until the fledglings have left the nest. The size of the buffer area varies with species and local circumstances (e.g., presence of busy roads) and is based on the professional judgement of the monitoring biologist, in coordination with the CDFW, as appropriate.

Compliance with the MBTA would ensure that the Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the CDFW or USFWS. Therefore, the Project's impact would be less-than-significant and no further evaluation of this topic in an EIR is required.

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28 Carlberg Associates, City of Los Angeles Tree Inventory Report—The Bloc, 700 S. Flower Street, 700 W. 7th Street, and 711 S. Hope Street, Los Angeles, California 90017, May 26, 2022. See Appendix IS-2 of this IS.

29 CDFW, California Natural Diversity Database, Special Animals List, January 2022.

30 USFWS, ECOS Environmental Conservation Online System, Listed species believed to or known to occur in California, https://ecos.fws.gov/ecp0/reports/ad-hoc-species-report, accessed March 25, 2022.

31 City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, Figure BR-1C—Biological Resources Areas (Central Geographical Area), January 19, 1995, p. 2-18-5.

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

No Impact. The Project Site is located in an urbanized area and is currently developed with hotel and commercial uses and associated parking as well as a direct portal to the 7th Street/Metro Central rail station. No riparian or other sensitive natural community exists on the Project Site or in the surrounding area.[32,33] Furthermore, the Project Site and surroundings are not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City or County.[34,35] In addition, there are no other sensitive natural communities identified by the CDFW or the USFWS.[36,37] Therefore, the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. As discussed above, the Project Site is located in an urbanized area and is currently developed with hotel and commercial uses and associated parking as well as a direct portal to the 7th Street/Metro Central rail station. No water bodies or state and federally protected wetlands exist on the Project Site.[38] As such, the Project would not have an adverse effect on state or federally protected wetlands. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant With Mitigation Incorporated. As discussed above, the Project Site is located in an urbanized area and is currently developed with hotel and commercial uses and associated parking as well as a direct portal to the 7th Street/Metro Central rail station. In addition, the areas surrounding the Project Site are fully developed and there are no large expanses of open space areas within or surrounding the Project Site that provide linkages to natural open spaces areas which may serve as wildlife corridors. Furthermore, the Project Site is not located in or adjacent to a

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32 City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APNs 5144-010-401, -405, -408, -421, -422, -423, and -425.

33 USFWS, National Wetlands Inventory, www.fws.gov/wetlands/data/Mapper.html, accessed March 25, 2022.

34 City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, Figure BR-1C—Biological Resources Areas (Central Geographical Area), January 19, 1995, p. 2-18-5.

35 County of Los Angeles, Department of Regional Planning, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, February 2015.

36 CDFW, Biogeographic Information and Observation System (BIOS), https://apps.wildlife.ca.gov/bios/, accessed March 25, 2022.

37 CDFW, CDFW Lands, https://apps.wildlife.ca.gov/lands/, accessed March 25, 2022.

38 USFWS, National Wetlands Inventory, www.fws.gov/wetlands/data/Mapper.html, accessed March 25, 2022.

Biological Resource Area or Significant Ecological Area as defined by the City or County of Los Angeles.[39,40]

According to the Tree Inventory Report prepared for the Project, dated May 26, 2022, and included in Appendix IS-1 of this Initial Study,[41] there are 25 right-of-way trees. There are no private property trees associated with the Project Site. None of the 25 right-of-way trees are considered to be protected by the City of Los Angeles Protected Tree and Shrubs Ordinance No. 186,873.[42,43] As indicated in the Tree Inventory Report, five of the 25 right-of-way trees on Hope Street would be removed as part of the Project and replaced in compliance with applicable City requirements. All other street trees would be avoided or preserved in place.

Although unlikely, the existing trees could potentially provide nesting sites for migratory birds. However, the Project would comply with the MBTA, which prohibits the take, possession, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, of any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid permit issued pursuant to federal regulations. Additionally, California Fish and Game Code Section 3503 states that "[i]t is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto." As discussed above, as the Project would require the removal of five existing trees, which could potentially provide nesting sites for migratory birds, construction activities could potentially adversely affect nesting sites. However, the project would comply with the MBTA regulations by conducting tree removal activities outside of the nesting season (February 1–August 31), to the extent feasible, and, tree or vegetation removal activities occur during the nesting season, the Applicant would retain a biological monitor during the removal activities to ensure that no active nests would be impacted. If active nests are found, a buffer would be established until the fledglings have left the nest. The size of the buffer area varies with species and local circumstances (e.g., presence of busy roads) and is based on the professional judgement of the monitoring biologist, in coordination with the CDFW, as appropriate.

Thus, the Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Therefore, the Project's impact would be less-than-significant. No further evaluation of this topic in the EIR is required.

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

40 County of Los Angeles, Department of Regional Planning, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, February 2015.

41 Carlberg Associates, City of Los Angeles Tree Inventory Report—The Bloc, 700 S. Flower Street, 700 W. 7th Street, and 711 S. Hope Street, Los Angeles, California 90017, May 26, 2022. See Appendix IS-2 of this IS.

42 Carlberg Associates, City of Los Angeles Tree Inventory Report—The Bloc, 700 S. Flower Street, 700 W. 7th Street, and 711 S. Hope Street, Los Angeles, California 90017, May 26, 2022. See Appendix IS-2 of this IS.

43 Pursuant to the Ordinance No. 186,873 and as defined in LAMC Section 17.02, a protected tree or shrub includes any of the following Southern California indigenous tree species, which measure four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree, or any of the following Southern California indigenous shrub species, which measure four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the shrub: Oak tree; Southern California Black Walnut tree; Western Sycamore tree; California Bay tree; Mexican Elderberry shrub; and Toyon shrub.

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

Less Than Significant Impact. The City of Los Angeles Protected Tree and Shrub Ordinance (Ordinance 186873, LAMC Chapter IV, Article 6) regulates the relocation or removal of all Southern California native oak trees (excluding scrub oak), California black walnut trees, Western sycamore trees, California Bay trees, Mexican Elderberry shrubs, and Toyon shrubs of at least four inches in diameter at breast height or four and one-half feet above the ground level at the base of the tree or shrub. These tree and shrub species are defined as "protected" by the City of Los Angeles. Trees or shrubs that have been planted as part of a tree planting program are exempt from the City's Protected Tree and Shrub Ordinance and are not considered protected. The City's Protected Tree and Shrub Ordinance prohibits, without a permit, the removal of any regulated protected tree, including "acts that inflict damage upon root system or other parts of the tree or shrub…" The protected tree or shrub must be replaced within the property by at least four specimens of a protected variety, except where the protected species is relocated pursuant to the LAMC. In addition, a protected tree shall only be replaced by other protected tree varieties and shall not be replaced by shrubs. A protected shrub shall only be replaced by other protected shrub varieties and shall not be replaced by trees, to the extent feasible as determined by the Advisory Agency, Board of Public Works, or a licensed or certified arborist.

According to the Tree Inventory Report prepared for the Project, dated May 26, 2022, and included in Appendix IS-1 of this Initial Study,[44] there are 25 right-of-way trees. There are no private property trees associated with the Project Site. None of the 25 right-of-way trees are considered to be protected by the City of Los Angeles Protected Tree and Shrubs Ordinance No. 186,873.[45,46] As part of the Project, five of the 25 right-of-way trees on Hope Street would be removed and replaced. Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

f. Would the project 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. As described above, the Project Site is located in an urbanized area and is currently developed with hotel and commercial uses and associated parking as well as a direct portal to the 7th Street/Metro Central rail station. The existing commercial uses consist of office, hotel, theater, retail,

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44 Carlberg Associates, City of Los Angeles Tree Inventory Report—The Bloc, 700 S. Flower Street, 700 W. 7th Street, and 711 S. Hope Street, Los Angeles, California 90017, May 26, 2022. See Appendix IS-2 of this IS.

45 Carlberg Associates, City of Los Angeles Tree Inventory Report—The Bloc, 700 S. Flower Street, 700 W. 7th Street, and 711 S. Hope Street, Los Angeles, California 90017, May 26, 2022. See Appendix IS-2 of this IS.

46 Pursuant to the Ordinance No. 186,873 and as defined in LAMC Section 17.02, a protected tree or shrub includes any of the following Southern California indigenous tree species, which measure four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree, or any of the following Southern California indigenous shrub species, which measure four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the shrub: Oak tree; Southern California Black Walnut tree; Western Sycamore tree; California Bay tree; Mexican Elderberry shrub; and Toyon shrub.

restaurant/bar, gym/fitness, and medical office uses. Existing landscaping adjacent to the Project Site includes 25 right-of-way trees. There are no private property trees associated with the Project Site. The Project Site does not support any designated habitat or natural community. No Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site.[47] Thus, the Project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other related plans. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

V. CULTURAL RESOURCES

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

a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

Potentially Significant Impact. Section 15064.5 of the CEQA Guidelines generally defines a historical resource as a resource that is: (1) listed in, or determined to be eligible for listing in the California Register of Historical Resources (California Register); (2) included in a local register of historical resources (pursuant to PRC Section 5020.1(k)); or (3) identified as significant in a historical resources survey (meeting the criteria in PRC Section 5024.1(g)). In addition, any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register. The California Register automatically includes all properties listed in the National Register of Historic Places (National Register) and those formally determined to be eligible for listing in the National Register. The local register of historical resources is managed by the Los Angeles Office of Historic

[47] CDFW, California Natural Community Conservation Plans, April 2019.

Resources, which operates SurveyLA, a comprehensive program to identify significant historical resources throughout the City.

As previously discussed, the Project Site is currently developed with hotel and commercial uses and associated parking as well as a direct portal to the 7th Street/Metro Central rail station. The existing commercial uses consist of office, hotel, theater, retail, restaurant/bar, gym/fitness, and medical office uses. Based on a review of the HistoricPlacesLA database,[48] the Project Site falls within the Seventh Street Commercial Historic District. Therefore, further evaluation of the Project's potential impacts on historical resources will be included in the EIR.

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

Less than Significant Impact. CEQA Guidelines Section 15064.5(a)(3)(D) generally defines archaeological resources as any resource that "has yielded, or may be likely to yield, information important in prehistory or history." Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community. The Project Site is located within an urbanized area of the City and has been subject to grading, excavation and fill activities, and development in the past. As provided in Appendix IS-2 of this Initial Study, the records search conducted for the Project Site by the South Central Coastal Information Center, indicates that there are no known archaeological resources within the Project Site. In addition, while segments of the zanja network, specifically Zanja Nos. 8 and 8-R, have been mapped in the vicinity of the Project Site, no documentation has been found depicting these zanja segments within the Project Site.[49] As discussed in Section 3, Project Description, of this Initial Study, the Project would require limited excavation associated with building foundations within the existing below-grade parking levels. Specifically, excavation for the proposed Project would extend approximately 10 feet below the existing parking garage level. Additionally, the Project may include the installation of drilled cast-in-place concrete pile foundations to support the new proposed structure, which may extend to a depth of up to 100 feet. Thus, the Project could have the potential to disturb previously undiscovered archaeological resources. Nevertheless, the City has established a standard condition of approval to address inadvertent discovery of archaeological resources. Should archeological resources be inadvertently encountered, this condition of approval provides for temporary halting of construction activities near the encounter so the find can be evaluated. An archaeologist shall then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Applicant shall then comply with the recommendations of the evaluating archaeologist, and a copy of the archaeological survey report shall be submitted to the Department of City Planning. Ground-disturbing activities may resume once the archaeologist's recommendations have been implemented to the satisfaction of the archaeologist. In accordance with the condition of approval, all activities would be conducted in accordance with regulatory requirements as set forth in CEQA Section 21083.2. Overall, with adherence to the City's condition of approval consistent with CEQA Section 21083.2, the Project would not cause a substantial adverse change in the significance of an

[48] City of Los Angeles, HistoricPlacesLA, www.historicplacesla.org/map, accessed January 24, 2022.

[49] Refer to Appendix IS-3 for a Map prepared by Cogstone that depicts unconfirmed segments of the Zanja network within the greater Project vicinity.

archaeological resource. As such, impacts to archaeological resources would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

c. Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant Impact. As discussed above, the Project site is located within an urbanized area and has been subject to previous grading and development. Therefore, the potential for uncovering human remains on the Project site is low. Nevertheless, the Project would require limited excavation associated with building foundations within the existing below-grade parking levels. Specifically, excavation for the proposed Project would extend approximately 10 feet below the existing parking garage level. Additionally, the Project may include the installation of drilled cast-in-place concrete pile foundations to support the new proposed structure, which may extend to a depth of 100 feet. As such, construction activities could have the potential to disturb existing but undiscovered human remains. If human remains were discovered during construction of the Project, work in the immediate vicinity of the construction area would be halted, the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5. In addition, disposition of the human remains, and any associated grave goods would occur in accordance with Public Resources Code Section 5097.98 and CEQA Guidelines Section 15064.5(e), which requires that work stop near the find until a coroner can determine that no investigation into the cause of death is required and if the remains are Native American. Specifically, in accordance with CEQA Guidelines Section 15064.5(e), if the coroner determined the remains to be Native American, the coroner shall contact the Native American Heritage Commission who shall identify the person or persons it believes to be most likely descended from the deceased Native American. The most likely descendent may make recommendations regarding the treatment of the remains and any associated grave goods in accordance with PRC Section 5097.98. Therefore, due to the low potential that any human remains are located on the Project site, and because compliance with the regulatory standards described above would ensure appropriate treatment of any potential human remains unexpectedly encountered during grading and excavation activities, the Project's impact related to human remains would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

VI. ENERGY

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

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

Potentially Significant Impact. The Project would generate an increased demand for electricity and natural gas services provided by the Los Angeles Department of Water and Power (LADWP) and the Southern California Gas Company, respectively. In addition, the Project would generate an increased demand on transportation energy. While development of the Project would not be anticipated to cause wasteful, inefficient, and unnecessary consumption of energy resources, further analysis of the Project's demand on existing energy resources will be provided in the EIR.

b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Potentially Significant Impact. First established in 2002 under SB 1078, California's Renewables Portfolio Standard (RPS) is one of the most ambitious renewable energy standards in the country. The RPS program requires all electric load serving entities to procure 60 percent of its electricity portfolio from eligible renewable energy resources by 2030. The LADWP provides electrical service throughout the City and many areas of the Owens Valley. LADWP generates power from a variety of energy sources, including hydropower, coal, gas, nuclear sources, and renewable resources, such as wind, solar, and geothermal sources.

Regarding energy efficiency, the California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) were adopted to ensure that building construction, system design, and installation achieve energy efficiency and preserve outdoor and indoor environmental quality. The current California Building Energy Efficiency Standards (Title 24 standards) are the 2019 Title 24 standards, which became effective on January 1, 2020.[50] The 2019 Title 24 standards include efficiency improvements to the residential standards for attics, walls, water heating, and lighting and efficiency improvements to the non-residential standards include alignment with the American Society of Heating and Air-Conditioning Engineers *(*ASHRAE) 90.1 2013 national standards.[51]

As previously described, the Project Site is currently developed with hotel and commercial uses and associated parking as well as a direct portal to the 7th Street/Metro Central rail station. The existing commercial uses consist of office, hotel, theater, retail, restaurant/bar, gym/fitness, and medical office uses. The Project Site does not include any renewable energy sources used by LADWP. The Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen. In addition, as discussed above, the Project would be designed to meet the standards for United States Green Building Council's Leadership in Energy and Environmental Design (LEED®) program to meet the standards of LEED Silver® or equivalent green building standards. While the Project would not be anticipated to conflict with or obstruct a state or local plan for renewable energy or energy

[50] CEC, 2019 Building Energy Efficiency Standards, www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency, accessed January 12, 2022.

[51] CEC, 2019 Building Energy Efficiency Standards for Residential and Nonresidential Buildings, December 2018.

efficiency, the Project's compliance with LADWP's plans for renewable energy, as well as the Project's compliance with California Building Energy Efficiency Standards, will be further evaluated in the EIR.

VII. GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause 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?	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

The following analysis is generally based on the Report of Geotechnical Evaluation for Environmental Impact Report (Geotechnical Evaluation) prepared for the Project by Wood Environment & Infrastructure Solutions, Inc., May 6, 2022. This report is included as Appendix IS-4 of this Initial Study.

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

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

Less Than Significant Impact. Fault rupture occurs when movement on a fault deep within the earth breaks through to the surface. Based on criteria established by the California Geological Survey (CGS), faults can be classified as active, potentially active, or inactive. Active faults are those having historically produced earthquakes or shown evidence of movement within the past 11,000 years (during the Holocene Epoch). Potentially active faults have demonstrated displacement within the last 1.6 million years (during the Pleistocene Epoch) while not displacing Holocene Strata. Inactive faults do not exhibit displacement within the last 1.6 million years. In addition, buried thrust faults, which are faults with no surface exposure, may exist in the vicinity of the Project Site; however, due to their buried nature, the existence of buried thrust faults is usually not known until they produce an earthquake.

CGS establishes regulatory zones around active faults, called Alquist-Priolo Earthquake Fault Zones (previously called Special Study Zones). These zones, which extend from 200 feet to 500 feet on each side of a known fault, identify areas where a potential surface fault rupture could prove hazardous for buildings used for human occupancy. Development projects located within an Alquist-Priolo Earthquake Fault Zone are required to prepare special geotechnical studies to characterize hazards from any potential surface ruptures. In addition, the City designates Fault Rupture Study Areas along the sides of active and potentially active faults to establish areas of potential hazard due to fault rupture.[52]

According to the Geotechnical Evaluation, the closest active fault is the Hollywood fault, which is located approximately 4.5 miles north-northwest of the Project Site. Other more distant faults include the Raymond fault located approximately 5.6 miles northeast of the Project Site, the North Los Angeles Basin section of the Newport-Inglewood fault zone located approximately 6 miles to the southwest of the Project Site, the Verdugo fault zone located approximately 6.8 miles north-northeast of the Project Site, the Santa Monica fault located approximately 8 miles west-northwest of the Project Site, the Sierra Madre Fault located approximately 12 miles northeast of the Project Site, the Whitter Fault located approximately 13 miles east-southeast of the Project Site, and the San Andreas fault zone located approximately 35 miles northeast of the Project Site. As such, the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone as mapped by CGS or within a Preliminary

[52] City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit A, p. 47.

Fault Rupture Study Area as designated by the City.[53,54] According to the Geotechnical Evaluation, the Project Site is underlain at depth by the Compton and Puente Hills blind thrust faults. Blind thrust faults are not exposed at the ground surface and are typically identified at depths greater than 3 kilometers. Therefore, these faults do not present a potential surface fault rupture hazard. Therefore, the potential for surface rupture due to faulting occurring beneath the Project Site is considered low. Furthermore, the proposed development would not involve mining operations or deep excavation into the earth, which could create unstable seismic conditions or stresses in the Earth's crust. Therefore, the Project would not exacerbate existing hazardous conditions related to surface rupture from a known earthquake fault that would result in substantial damage to structures, infrastructure, or other properties or expose people to substantial risk of injury. Impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

ii. Strong seismic ground shaking?

Less Than Significant Impact. The Project Site is located in the seismically active region of Southern California and would potentially be subject to strong seismic ground shaking if a moderate to strong earthquake occurs on a local or regional fault. As discussed above, no active faults are known to pass directly beneath the Project site and the Project site is not located in an Alquist-Priolo Earthquake Fault Zone. Specifically, the closest active fault is the Hollywood Fault located approximately 4.5 miles northwest of the Project site. As discussed in the Geotechnical Evaluation, ground shaking is addressed by proper engineering design and construction in conformance with current building codes and engineering practices. Specifically, state and local code requirements ensure that buildings are designed and constructed in a manner that, although the buildings may sustain damage during a major earthquake, would reduce the substantial risk that buildings would collapse. The Project would comply with the Los Angeles Building Code, which incorporates current seismic design provisions of the California Building Code with City amendments. The California Building Code incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and maximize earthquake safety. The Los Angeles Department of Building and Safety (LADBS) is responsible for implementing the provisions of the Los Angeles Building Code, and the Project would be required to comply with the plan review and permitting requirements of the labs, including the recommendations provided in a comprehensive design level geotechnical investigation for the Project to be approved by LADBS. The Project would also require seismic retrofit of the existing non-ductile concrete podium (pursuant to City Ordinance No. 183,893). As part of the seismic retrofit, the diameter of the existing columns must be enlarged by approximately 1 foot. New shear walls would be located on all levels of the existing podium building and the two new parking levels, along the interior walls facing west, south and east. The thickness of the shear walls would range from approximately 2 feet to 3 feet to strengthen the structural support system on each level of the podium. In addition, in order to construct the residential tower, a portion of the existing parking levels and the retail levels of the podium building must be removed to add new structural columns, elevators, stairwells, bicycle parking, mechanical rooms, storage areas, etc. As a result of the seismic

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[53] City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APNs 5144-010-401, -405, -408, -421, -422, -423, and -425.

[54] Department of City Planning Los Angeles, Safety Element of the Los Angeles General Plan, Exhibit A—Alquist-Priolo Special Study Zones & Fault Rupture Study Areas in the City of Los Angeles.

retrofit work and the residential structural support, elevators, stairwells, bicycle parking, mechanical rooms and storage areas, a total of 464 existing commercial parking spaces would be eliminated.

In addition, the Project would not involve mining operations, deep excavation into the earth, or boring of large areas, which could create unstable seismic conditions such as strong seismic ground shaking. Therefore, development of the Project would not result in strong seismic ground shaking caused in whole or in part by the Project's exacerbation of the existing environmental conditions.

Based on the above, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction occurs when loose, saturated, granular soils lose their strength due to excess water pressure that builds up during repeated movement from seismic activity. Liquefaction usually results in horizontal and vertical movements from lateral spreading of liquefied materials and post-earthquake settlement of liquefied materials. Factors that contribute to the potential for liquefaction include a low relative density of granular materials, a shallow groundwater table, and a long duration and high acceleration of seismic shaking. The effects of liquefaction include the loss of the soil's ability to support footings and foundations which may cause buildings and foundations to buckle.

According to the California Department of Conservation's earthquake fault zone mapping system, the Project Site is not located within a liquefaction zone.[55] This determination is based on groundwater depth records, soil type, and distance to a fault capable of producing a substantial earthquake. The Safety Element of the Los Angeles City General Plan also indicates the Project Site is not located within a liquefiable area.[56] Also, according to the Geotechnical Evaluation, the soils encountered in the borings drilled at the Project Site were stiff and/or dense and are not susceptible to liquefaction or seismically induced settlement. Furthermore, as concluded in the Geotechnical Evaluation, groundwater was not present in the upper 50 feet beneath the Project Site; therefore, the potential for liquefaction and seismically induced settlement is considered low. Thus, impacts related to liquefaction would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

iv. Landslides?

No Impact. Landslides generally occur in loosely consolidated, wet soils and/or rocks on steep sloping terrain. The Project Site is within a heavily urbanized area with gentle south and southeast surface gradient. According to the California Department of Conservation's earthquake fault zone

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55 California Department of Conservation, Earthquake Zones of Required Investigation, CGS Homepage, https://maps.conservation.ca.gov/cgs/EQZApp/app/, accessed June 25, 2022.

56 Department of City Planning Los Angeles, Safety Element of the Los Angeles General Plan, Exhibit B—Areas Susceptible to Liquefaction in the City of Los Angeles, p. 49.

mapping system, the Project Site is not located within a landslide zone.[57] Furthermore, the Los Angeles General Plan Safety Element does not map the Project Site in a landslide area.[58] According to the Geotechnical Evaluation, there are no known landslides at the Project Site and the Project Site is not within the path of any known potential landslides. As such, the probability of seismically induced landslides occurring on the Project Site is considered low. Development of the Project also would not include altering the existing topography of the Project Site such that steep slopes would be introduced. As such, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

b. Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. Construction of the Project would require grading, limited excavation associated with the installation of building foundations, and other construction activities that have the potential to disturb soils underneath the Project Site and expose these soils to rainfall and wind, which can result in soil erosion. However, this potential soil erosion would be reduced by the implementation of standard erosion controls during site preparation and grading activities. Specifically, all grading activities would require grading permits from the Los Angeles Department of Building and Safety, which would include requirements and standards designed to limit potential effects associated with erosion to acceptable levels. In addition, on-site grading and site preparation would comply with all applicable provisions of Chapter IX, Article 1 of the LAMC, which addresses grading, excavation, and fills. The Project would also be required to comply with the City's Low Impact Development (LID) ordinance and implement standard erosion controls to limit stormwater runoff, which can contribute to erosion. Regarding soil erosion during Project operations, the potential is negligible since the Project Site would mostly remain fully developed and no soils would be left exposed. Therefore, with compliance with applicable regulatory requirements, impacts related to substantial soil erosion or the loss of topsoil would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. As discussed above, the Project Site is not located near slopes or geologic features that would result in on- or off-site landslides. Therefore, no impacts related to landslides would occur, and no mitigation measures are required.

Liquefaction-related effects include lateral spreading. As evaluated in the Geotechnical Evaluation and discussed above, the Project Site is not susceptible to liquefaction and would not potentially result in lateral spreading. Impacts related to liquefaction and lateral spreading would be less than significant, and no mitigation measures are required.

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[57] California Department of Conservation, Earthquake Zones of Required Investigation, CGS Homepage, https://maps.conservation.ca.gov/cgs/EQZApp/app/, accessed June 25, 2022.

[58] Department of City Planning Los Angeles, General Plan Safety Element, November 1996, Exhibit C, Landslide Inventory & Hillside Areas, p. 51.

Subsidence generally occurs when a large portion of land is displaced vertically, usually due to the withdrawal of groundwater, oil, or natural gas. No large scale extraction of groundwater, gas, oil or geothermal energy is occurring or planned at the Project Site or in the general vicinity of the Project Site. Therefore, there is no potential for ground subsidence due to withdrawal of fluid or gas at the Project Site. Thus, no impacts related to subsidence would occur, and no mitigation measures are required.

Collapsible soils consist primarily of sand- and silt-sized particles arranged in a loose structure held together by water-soluble cementing agents. In a dry state, the cementing agents lead to a strong soil with relatively low compressibility. However, upon wetting and softening of the cementing agents, the loose soil structure can collapse and the soil would become weaker and more compressible. As discussed in the Geotechnical Evaluation, the alluvial soils encountered in the borings drilled at the site were stiff and/or dense and not susceptible to collapse. Therefore, impacts associated with collapsible soils would be less than significant, and no mitigation measures are required.

The Geotechnical Evaluation also evaluates building settlement, which depends on the magnitude of the structural loads. Based on preliminary loading information, the Geotechnical Evaluation indicates that the proposed tower may need to be supported on drilled cast-in-place concrete pile foundations rather than a mat foundation. The specific details of the building foundations would comply with City requirements regarding structural loads and would be determined as part of the review and approval of a design level site-specific geotechnical investigation by LADBS.

Based on the above, the Project would not cause a geologic unit or soil to become unstable. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant. Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. Due to high clay content, expansive soils expand with the addition of water and shrink when dried, which can cause damage to overlying structures. As provided in the Geotechnical Evaluation, the soils underlying the Project Site are predominately sands with lesser silts and clays and, hence, are primarily of low expansion potential. However, the fine-grained alluvial soils may be moderately expansive. The Project design and construction would comply with all applicable requirements of the LADBS for a site with underlying expansive soils. Such requirements may include excavation and replacement of upper soils (for any expansive soils at the street level), deepening of foundations, cement treatment, and/or moisture conditioning of the upper soils. These specific requirements would be determined as part of review and approval of the site-specific design-level geotechnical investigation by LADBS. Thus, compliance with regulatory requirements would ensure that potential impacts associated with expansive soils would be less than significant. No further evaluation of this topic in an EIR is required.

As discussed in the Geotechnical Investigation, soil corrosivity involves the measure of the potential of corrosion for steel and concrete caused by contact with some types of soil. Soils with high moisture content, high electrical conductivity, high acidity, high sulfates, and high dissolved salts content are most corrosive. Generally, sands and silty sands do not present a corrosive environment. Clay soils,

including those that contain interstitial salt water, can be highly corrosive. Localized areas of corrosive soils may be present at the Project Site which could react adversely to buried steel and concrete. In accordance with regulatory requirements, site-specific deign requirements for corrosive soils could include isolation of utilities from soils with barriers or wrappings, cathodic isolation, and/or cathodic protection. These specific requirements would be determined as part of review and approval of the site-specific design-level geotechnical investigation by LADBS. Thus, compliance with regulatory requirements would ensure that potential impacts associated with corrosive soils would be less than significant. No further evaluation of this topic in an EIR is required.

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

No Impact. The Project Site is located within a community served by existing wastewater infrastructure. As such, the Project would not require the use of septic tanks or alternative wastewater disposal systems. Therefore, the Project would not have an impact related to the ability of soils to support septic tanks or alternative wastewater disposal systems. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact. Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms, since the majority of species that have existed on earth from this era are extinct. The Project Site is located within an urbanized area of the City and has been subject to grading, excavation and fill activities, and development in the past. Thus, surficial paleontological resources that may have existed at one time have likely been previously disturbed.

As discussed in Section 3, Project Description, of this Initial Study, the Project would require limited excavation associated with building foundations within the existing below-grade parking levels. Specifically, excavation for the proposed Project would extend approximately 10 feet below the existing parking garage level. Additionally, the Project may include the installation of drilled cast-in-place concrete pile foundations to support the new proposed structure, which may extend to a depth of up to approximately 100 feet. Thus, it is possible that paleontological artifacts that were not recovered during prior construction or other human activity may be present. However, the City has established a standard condition of approval to address inadvertent discovery of paleontological resources. Should paleontological resources be inadvertently encountered, this condition of approval provides for temporary halting construction activities near the encounter so the find can be evaluated. A paleontologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The paleontologist shall then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Applicant shall then comply with the recommendations of the evaluating paleontologist, and a copy of the paleontological survey report shall be submitted to the Los Angeles County Natural History Museum and the Department of City Planning. Ground-disturbing activities may resume once the paleontologist's recommendations have been implemented to the satisfaction of the paleontologist. With implementation of the City's established condition of approval to address any inadvertent

discovery of paleontological resources, Project impacts would be less than significant, and no mitigation measures are required.

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

VIII. GREENHOUSE GAS EMISSIONS

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

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

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

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

Potentially Significant Impact. As the Project would have the potential to emit GHGs, the EIR will include further evaluation of Project-related emissions and associated emission reduction strategies to determine whether the Project conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs (e.g., Assembly Bill [AB] 32 and the City of Los Angeles Green Building Code).

IX. HAZARDS AND HAZARDOUS MATERIALS

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

The following analysis is based, in part, on the *Phase I Environmental Site Assessment* (Phase I ESA) prepared for the Project by CBRE, dated October 24, 2019. This report is included as Appendix IS-5 of this Initial Study.

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

Less Than Significant Impact.

Construction

During demolition, excavation, on-site grading, and building construction, hazardous materials such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners could be routinely used on the Project Site. While some hazardous materials used during construction could require disposal, such activity would occur only for the duration of construction and would cease upon completion of the Project. In addition, all potentially hazardous materials to be used during construction of the Project would be used and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. Construction of the Project would also comply with all applicable federal, state, and local requirements concerning the use, storage, and management of hazardous materials. Consequently, Project construction activities would not create a significant hazard to the public or the environment through the use of hazardous materials during construction. Therefore, impacts related to the routine transport, use, or disposal of hazardous materials during construction would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

Operation

Operation of the Project would involve the routine use of small quantities of potentially hazardous materials typical of those used in residential uses, including cleaning products, paints, and those used for maintenance of landscaping. In addition, as with Project construction, all hazardous materials used on the Project Site during operation would be used, stored, and disposed of in accordance with all applicable federal, state and local requirements. Due to the type of development proposed (e.g., residential uses), operation of the Project would not involve the routine transport of hazardous materials to and from the Project Site. Therefore, with compliance with all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials, impacts associated with the routine transport, use, or disposal of hazardous materials during operation of the Project would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. The existing and previous land uses within the Project Site were identified as part of the Phase I ESA to assess their potential to present concerns relative to the presence of hazards and/or the handling of hazardous materials. As discussed in the Phase I ESA, based on available historical sources (i.e., subject property summary findings, topographic maps, fire insurance maps, and aerial photographs, etc.), prior to the construction of the existing improvements, the Project Site was developed with numerous different uses. Single family residences were identified as early as 1888. By 1920, the southern portion of the Project Site was improved with a Swedish Baptist Church, two hotels, and a boarding house. By 1958, the former residential units located on the north portion of the Project Site had been converted into retail uses. Additionally, a portion of a YMCA building with a restaurant and a swimming pool occupied the northeastern end of the Project Site; retail uses, a clinic, and parking lots occupied the western portion of the Project Site; and commercial (retail and restaurant) uses, parking, and a sign painting area occupied the southern portion of the Project Site. By 1963, the entire western portion of the Project Site had been cleared

and was utilized as a parking lot, the southwestern corner of the Project Site was improved with a hotel and several commercial uses, and the southeastern portion of the Project Site was improved with commercial (retail and restaurant) uses, a parking garage, and a parking lot. By 1967 the uses on the northern portion of the Project Site were demolished and developed with a parking lot. At this time, the YMCA building was still occupied on the northeastern portion of the Project Site, along with several commercial uses, a motel, and a parking lot. The parking lot, hotel, and stores near the southwestern portion remain unchanged. By 1970, the commercial uses on the northeastern portion of the Site and the YMCA were demolished and the area was redeveloped with a parking lot. One small motel occupied the eastern end of the Site, and the southeastern portion of the Project Site was also cleared and used as a parking lot. In addition, the existing parking lot, hotel, and commercial uses near the southwestern portion remain unchanged. By 2011, the Project Site was improved with the existing structures (i.e., hotel and commercial uses parking, and a portal to the 7th Street/Metro Central rail station) and by 2015, the interior plaza mall structure roof appears to have been removed.

Based on a review of available documents and database records search, no Historical Recognized Environmental Conditions (HRECs), Recognized Environmental Conditions (RECs), or Controlled Recognized Environmental Conditions (CRECs) were identified in connection with the Project Site.

Provided below is a summary of the findings of the Phase I ESA as well as an evaluation of other potential hazardous materials that may be present on the Project Site during construction and operation of the Project.

Construction

Hazardous Waste Generation, Handling, and Disposal

During demolition, excavation, on-site grading, and building construction, hazardous materials such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners, could be used, and therefore, would require proper handling and management and, in some cases, disposal. The use, handling, storage, and disposal of these materials could increase the opportunity for hazardous materials releases and, subsequently, the exposure of people and the environment to hazardous materials. However, as previously discussed, all potentially hazardous materials used during construction of the Project would be used and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. In addition, the Project would comply with all applicable federal, state, and local requirements concerning the use, storage, and management of hazardous materials. Consequently, Project construction activities would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of potentially hazardous materials used during construction.

As discussed in the Phase I ESA, a Tier I (non-intrusive) Vapor Encroachment Screening (VES) was conducted on the Project Site in accordance with the methodology set forth in ASTM E 2600-15, Standard Guide for Vapor Encroachment Screening on Property Involved in Real Estate Transactions. As concluded in the Phase I ESA, historical and current uses on the Project Site were not identified to likely represent a vapor encroachment condition (VEC). Additionally, several impacted properties were identified in CBRE's regulatory database review; however, based upon groundwater flow

direction and/or the furthest known extents of the contamination, none of these properties are suspected of having petroleum or chemical contaminant plumes that would be identified as a VEC.

Based on the above, construction of the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and impacts associated with hazardous waste generation, handling, and disposal during construction would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

Underground and Aboveground Storage Tanks

According to the Phase I ESA, no evidence of existing Underground Storage Tanks (USTs) was observed on the Project Site. No other records were found that indicate the presence of USTs within the areas proposed for construction. Six 25- and 50-gallon Aboveground Storage Tanks (ASTs), a 1,000-gallon AST, and two 8,800-gallon ASTs containing diesel fuel were observed on-site; however, the ASTs appear to be in good condition and void of leaks, and no suspect conditions were noted. In the unlikely event that USTs are found, suspect materials would be removed in accordance with all applicable federal, state, and local regulations. For example, if underground storage tanks are encountered, prior to removal, applicable permits would be obtained from the LAFD. Therefore, with compliance with applicable regulations, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and impacts related to the potential removal of USTs during construction would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

Asbestos-Containing Materials

Asbestos was widely used in the building industry starting in the late 1800s and up until the late 1970s for a variety of uses, including acoustic and thermal insulation and fireproofing, and is often found in ceiling and floor tiles, linoleum, pipes, structural beams, and asphalt. Any building, structure, surface asphalt driveway, or parking lot constructed prior to 1979 could contain asbestos or Asbestos Containing Materials (ACMs). Based on an asbestos survey previously conducted for the Project Site (see Appendix IS-5 of this Initial Study), positive asbestos results were detected in samples of drywall and tape, joint compound, fireproofing material, wall and ceiling texture, transite panels, thermal systems insulation, floor tile and mastic, carpet mastic and glue, cove base mastic, exterior stucco, leveling compound, and pipe wrap. However, the Project Site has since then undergone asbestos abatement and an Asbestos Operations and Maintenance Plan was prepared for the Project Site. Since remaining materials were observed in good condition, no further action is recommended at this time other than maintaining same in good condition under the existing Asbestos Operations and Maintenance Program. With compliance with relevant regulations and requirements regarding asbestos-containing materials, Project construction activities would not expose people to a substantial risk resulting from the release of asbestos fibers into the environment. Therefore, with compliance with applicable regulations, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Impacts related to the removal of ACMs during demolition would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

Lead-Based Paint

Lead is a naturally occurring element and heavy metal that was widely used as a major ingredient in most interior and exterior oil-based paints prior to 1950. Lead compounds continued to be used as corrosion inhibitors, pigments, and drying agents from the early 1950s to 1972, when the Consumer Products Safety Commission specified limits on lead content in such products. Based on a lead paint survey previously conducted for the Project Site (see Appendix IS-5 of this Initial Study), positive lead paint results were reported in several locations throughout the Project Site. Due to the extensive renovation activities that have occurred on-site, it is likely that some lead paint has been removed, although no documentation regarding any specific lead paint abatement was provided. Nonetheless, in the event that LBP is found within areas proposed for demolition, suspect materials would be removed in accordance with procedural requirements and regulations for the proper removal and disposal of LBP prior to demolition activities, including standard handling and disposal practices pursuant to OSHA regulations. Example procedural requirements include the use of respiratory protection devices while handling lead-containing materials, containment of lead or materials containing lead on the Project Site or at locations where construction activities are performed, and certification of all consultants and contractors conducting activities involving LBP or lead hazards. With compliance with relevant regulations and requirements, Project construction activities would not expose people to a substantial risk resulting from the release of LBP into the environment. Therefore, with compliance with applicable regulations, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Impacts related to the removal of LBP during demolition would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

Polychlorinated Biphenyls

Typical sources of polychlorinated biphenyls (PCBs) include electrical transformer cooling oils, fluorescent light fixture ballasts, and hydraulic oil. In 1976, the USEPA banned the manufacture and sale of PCB-containing transformers. According to the Phase I ESA for the Project Site, four electrical transformers, three hydraulic solid waste compactors, and a high-voltage switch were observed on-site. According to the Phase I ESA, based on the age of the compactors, the hydraulic components are not suspected to contain PCBs. However, it is likely that the transformers and high-voltage switch contain PCBs. Therefore, in the event that PCBs are found within areas proposed for demolition, suspect materials would be removed in accordance with all applicable federal, state, and local regulations. Therefore, with compliance with applicable regulations, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and impacts related to the removal of PCBs during demolition would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

Oil Wells and Methane

According to the State of California Department of Conservation's Division of Oil, Gas, and Geothermal Resources (CalGEM) Online Mapping System, the Project Site is not located within any oil

or gas field, and no oil or natural gas wells were located on the Project Site.[59] However, the Project Site is located within a designated Methane Buffer Zone as mapped by the City.[60] Excavation and construction activities within the Project Site that involve work in confined spaces on-site could pose a potential for methane and hydrogen sulfide build-up, resulting in a possible hazardous condition. Adherence to industry-standard construction safety measures, as well as compliance with California Occupational Safety and Health Act safety requirements, would serve to reduce the risk in the event that elevated levels of these soil gases are encountered during grading and construction. In addition, as the Project is located in a Methane Buffer Zone, the Project would be required to comply with the City's methane ordinance (Ordinance No. 175790), which requires site testing for methane concentrations and soil gas pressures, and based on the results of such testing, may require a methane system to be integrated into the Project's design during construction. As such, with compliance with existing regulations, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving methane gas. Impacts associated with methane gas would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

Operation

Hazardous Waste Generation, Handling, and Disposal

As discussed above, Operation of the Project would involve the routine use of small quantities of potentially hazardous materials typical of those used in residential uses. Activities involving the handling and disposal of hazardous wastes would occur in compliance with all applicable federal, state, and local requirements concerning the handling and disposal of hazardous waste. Therefore, with compliance with applicable regulations and requirements, operational activities would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and impacts associated with hazardous waste generation, handling, and disposal during operation of the Project would be less than significant. No further evaluation of this topic in an EIR is required.

Underground and Aboveground Storage Tanks

Development of the Project includes residential uses. The Project does not propose the installation of underground or aboveground storage tanks. As such, operation of the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and impacts associated with underground and aboveground storage tanks during operation of the Project would be less than significant. No further evaluation of this topic in an EIR is required.

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[59] CalGem, Well Finder Online Mapping System, https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-118.25455/34.04665/15, accessed January 23, 2022.

[60] City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APNs 5144-010-401, -405, -408, -421, -422, -423, and -425.

Asbestos-Containing Materials

Development of the Project would include the use of commercially-sold construction materials that would not include asbestos or ACMs. Project operation is, therefore, not anticipated to increase the occurrence of friable asbestos or ACMs at the Project Site. Therefore, operation of the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and no impacts associated with asbestos or ACMs during operation of the Project would occur. No further evaluation of this topic in an EIR is required.

Lead-Based Paint

Development of the Project would include the use of commercially-sold construction materials that would not include LBP. Project operation is, therefore, not anticipated to increase the occurrence of LBP at the Project Site. Operation of the Project would not expose people to LBP as no LBPs would be used. Thus, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and impacts associated with LBP during operation of the Project would not occur. No further evaluation of this topic in an EIR is required.

Polychlorinated Biphenyls

In accordance with existing regulations which ban the manufacture of PCBs, the new electrical systems to be installed as part of the Project would not contain PCBs. Therefore, during operation of the Project, maintenance of such electrical systems would not expose people to PCBs and operation of the Project would not expose people to any risk resulting from the release of PCBs in the environment. Therefore, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and no impacts related to PCBs during Project operation would occur. No further evaluation of this topic in an EIR is required.

Oil Wells and Methane Gas

The Project does not include the installation of oil wells. As such, operation of the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and no impacts associated with oil wells during operation would occur.

As discussed above, the Project is within a Methane Buffer Zone identified by the City.[61] All new buildings and paved areas located within a Methane Zone or Methane Buffer Zone must comply with the City's methane ordinance. As discussed above, the City's methane ordinance requires site testing for methane concentrations and soil gas pressures, and based on the results of such testing, may require a methane system to be integrated into the Project's design to ensure the health and safety of Project occupants. As the permitting process would ensure that new development would comply with

[61] City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APNs 5144-010-401, -405, -408, -421, -422, -423, and -425.

the City's Methane Mitigation Ordinance, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and impacts associated with the release of methane gas during operation would be less than significant. No further evaluation of this topic in an EIR is required.

c. Would the project 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 Impact. The nearest school to the Project Site is SEA Charter High School, Downtown, located approximately 290 feet northeast of the Project Site. As discussed above, the types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used during construction of residential developments, including vehicle fuels, paints, oils, and transmission fluids. Similarly, the types and amounts of hazardous materials used during operation of the proposed residential uses would be typical of such developments and would include cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products. Therefore, the types of potentially hazardous materials that would be used in connection with the Project would be consistent with other potentially hazardous materials currently used in the vicinity of the Project Site. In addition, the Project would not involve the use or handling of acutely hazardous materials, substances, or waste. Furthermore, all materials used during both the construction and operation of the Project would be used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. As such, the use of such materials would not create a significant hazard to nearby schools. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

d. Would the project 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?

Less Than Significant Impact. Section 65962.5 of the California Government Code requires the California Environmental Protection Agency to develop and update annually the Cortese List, which is a "list" of hazardous waste sites and other contaminated sites. While Section 65962.5 makes reference to the preparation of a "list," many changes have occurred related to web-based information access in the past decades and information regarding the Cortese List is now compiled on the websites of multiple agencies

The Project Site was identified on the following databases: Resources Conservation and Recovery Act—Small Quality Generators (RCRA-SQG), RCRA Non-Generator, Federal Facility Index System Data Systems (FINDS)/ Enforcement and Compliance History Online (ECHO), Emergency Response Notification System (ERNS), State Hazardous Waste Information System (HAZNET), County Hazardous Materials Management (Hazmat), Emissions Inventory Data (EMI), AST, California Environmental Reporting System (CERS), and Historical Cleaners.

The ERNS listing identified the Project Site on NRC Report No. 1069366, reported on December 23, 2013. According to the database, LBP was being removed from the southern corner of the Project Site at 8th and Hope Streets by a pressure washer and some of the removed paint entered a storm sewer. The quantity of released material was not reported and the incident was listed as Fixed on

December 24, 2013. As discussed in detail in the Phase I, this listing does not represent a REC to the Project Site.

As discussed in the Phase I, the Project Site and several previous tenants, appear on the Federal RCRA small quantity generator and non-generator databases, as well as on the State HAZNET databases, related to the generation and removal of hazardous waste. Waste streams identified included ACMs, oil-containing materials, waste oil, hydrocarbon solvents, organic solids, and paint waste. No manufacturing or industrial uses were identified at the Project Site. As such, the current and previous generation of hazardous waste on the Project Site appears to be related to routine building maintenance practices and not to large-scale industrial waste generation. The Project Site was also cross-referenced on the FINDS and ECHO databases due to the identification of hazardous waste removal activities.

The Project Site was also identified on the EMI database, under the names of Broadway Plaza and Hope & Flower BP Partnership. It is likely that these listings are related to the use of diesel-powered generators, diesel-powered fire pumps, and natural gas-fueled boilers, on the Project Site. No violations were listed, and none were found on the South Coast Air Quality Management District (SCAQMD) website. Based on this information, these listings are not suspected to be of a significant environmental concern to the Project Site.

The Project Site is also listed on the registered AST database and the CERS database maintained by the City of Los Angeles Fire Department (LAFD). The database notes that violations were issued during several routine inspections by the Fire Department, none of which were indicative of a release of hazardous substances, and none which are of significant concern.

The Project Site appears on the EDR Historical Cleaners database, under the name of Broadway Plaza Cleaners and Service As You Like It, from 1993 and 1994. However, as discussed in the Phase I ESA, included as Appendix IS-5 of this Initial Study, Broadway Plaza Cleaners was a "drop-off" location only and no dry cleaning was conducted on-site. In addition, no regulatory agency records, including from the LAFD, the SCAQMD, and the State Department of Toxic Substances Control, were identified indicative of on-site dry cleaning operations.

As concluded in the Phase I ESA, the Project Site does not appear on any databases of known or suspected releases. As such, these listings do represent a REC. Impacts regarding the identification of the Project Site on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. The Project site is not located within 2 miles of a private airstrip, public airport or public use airport, and is not located within an airport land use plan. The closest private airstrip or airport is the Los Angeles International Airport, which is located approximately 10.5 miles west of the Project Site. Given the distance between the Project Site and the nearest airport, the Project would not have the potential to exacerbate current environmental conditions that would result in a safety hazard or

excessive noise. Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic is required.

f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Potentially Significant Impact. According to the Safety Element of the City's General Plan, the nearest designated disaster route to the Project Site is Figueroa Street, which is located approximately 430 feet west of the Project Site.[62] While it is expected that the majority of construction activities for the Project would be confined to the Project Site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. If lane closures are necessary, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access.

With regard to operation, the Project would not require the permanent closure of any local public or private streets and would not impede emergency vehicle access to the Project site or surrounding area as set forth in California Vehicle Code (CVC) 21806(a)(1). In addition, the Project would comply with LAFD access requirements and applicable LAFD regulations regarding safety. Therefore, with compliance with applicable regulatory requirements, the Project would not impede emergency access within the Project site or vicinity that could cause an impediment along City designated disaster routes such that the Project would impair the implementation of the City's emergency response plan. However, because the requested haul route and the Transportation Assessment (discussed further below in Response to Checklist Question No. XVII.a) are still under review by the City of Los Angeles Department of Transportation (LADOT), the Draft EIR will include a discussion of the site's emergency access during construction activities in light of LADOT's review of the haul route and the Transportation Assessment.

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

No Impact. The Project Site is located in an urbanized area without wildlands in its vicinity. In addition, the Project Site is not located within a City-designated Very High Fire Hazard Severity Zone[63] or a City-designated fire buffer zone.[64] Furthermore, the Project would be developed in accordance with LAMC requirements pertaining to fire safety. In addition, the proposed residential uses would not create a fire hazard that has the potential to exacerbate the current environmental condition relative to wildfires. Therefore, the Project would not expose people or structures, directly or indirectly, to a significant risk of loss, injury, or death as a result of exposure to wildland fires, and, as such, no impact would occur. No further evaluation of this topic in the EIR is required.

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62 City of Los Angeles, Safety Element of the Los Angeles City General Plan, Exhibit H, November 26, 1996, p. 61.

63 City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APNs 5144-010-401, -405, -408, -421, -422, -423, and -425. The Very High Fire Hazard Severity Zone was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone" shown on Exhibit D of the Los Angeles General Plan Safety Element.

64 City of Los Angeles General Plan Safety Element, November 1996, Exhibit D, Selected Wildfire Hazard Areas, p. 53.

X. HYDROLOGY AND WATER QUALITY

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

The following analysis is based, in part, on the *Hydrology & Water Quality Technical Stormwater Report* (Hydrology Report) prepared for the Project by KPFF Consulting Engineers, dated April 2022, and included as Appendix IS-6 of this Initial Study.

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. As demonstrated by the following analysis, the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.

Surface Water Quality

Construction

During Project construction, 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 described above, the Project would require limited excavation associated with building foundations within the existing below-grade parking levels. Specifically, excavation for the Project would extend approximately 10 feet below the existing parking garage level. In addition, the Project may include the installation of drilled cast-in-place concrete pile foundations to support the new proposed structure, which may extend to a depth of 100 feet.

As discussed in the Hydrology Report, the Project would disturb approximately 16,500 square feet (0.38 acre) of site area. As Project construction would disturb less than 1 acre of soil, the Project would not be required to file a Stormwater Pollution Prevention Plan (SWPPP) with the State, but would be required by the City of Los Angeles to put in place an erosion control plan (Local SWPPP) for the full duration of Project construction activities. The Local SWPPP would consist of construction Best Management Practices (BMPs) including, but not limited to, sand bag barriers, inlet protection, regular street sweeping, controlled entrance/exit with rumble plates, dust control, and designated staging areas for materials and equipment. The Local SWPPP would be implemented when construction commences, prior to site clearing and grubbing or demolition activities. In addition, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), such as the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion.

As provided in the Geotechnical Evaluation, included as Appendix IS-4 of this Initial Study, the historically highest groundwater level is approximately 70 feet below grade. In addition, groundwater was encountered at depths between 54.5 and 76 feet below the existing site. Therefore, Project construction activities are expected to encounter groundwater. While dewatering during construction is not anticipated since the seepage water anticipated in the perched layers can be handled with temporary subdrains and subsequently the permanent retaining wall subdrainage system, in the event dewatering is required, temporary dewatering systems such as dewatering tanks, sand media particulate, pressurized bag filters, and cartridge filters would be utilized in compliance with the NPDES permit. Furthermore, 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 Local SWPPP required to comply with the City's grading permit regulations, construction of the Project would not result in discharges that would violate any surface water quality standard or waste discharge requirements. Thus, temporary construction-related impacts on surface water quality would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

Operation

As is typical of most urban existing uses and proposed developments, stormwater runoff from the Development Area has the potential to introduce pollutants into the stormwater system. Anticipated and potential pollutants generated by the Project are sediment, nutrients, pesticides, metals, pathogens, and oil and grease. Under the City's Low Impact Development (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"). The implementation of BMPs required by the City's LID Ordinance would target the pollutants that could potentially be carried in stormwater runoff. According to the LID Ordinance requirements, the order of priority for selected BMPs is infiltration systems, stormwater capture and use, high efficiency biofiltration/bioretention systems, and any combination of any of the above. As discussed in the Hydrology Report, capture and use would be feasible and is recommended. Specifically, the Project would install a new storage tank with a submersible pump that would store stormwater runoff for use as drip irrigation for the planter areas on the upper and lower exterior amenity levels of the residential portion of the new building. In the case that the proposed system becomes overwhelmed by a storm event, the collected runoff would discharge to an approved discharge point in the public right-of-way.

As discussed in the Hydrology Report, the existing Development Area does not have any structural or LID BMPs to treat or infiltrate stormwater. Therefore, implementation of the LID features proposed as part of the Project would result in an improvement in surface water quality runoff as compared to existing conditions. Implementation of the proposed BMP system would result in the treatment of the entire required volume for the Development Area and the elimination of pollutant runoff up to the 85th percentile storm event. Therefore, with the incorporation of LID BMPs, operation of the Project would not result in discharges that would violate any surface water quality standards or waste discharge requirements. Impacts to surface water quality during operation of the Project would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

Groundwater Quality

Construction

As discussed above, based on the historically highest groundwater level and depth of proposed excavation, Project construction activities are expected to encounter groundwater. While dewatering during construction is not anticipated since the seepage water anticipated in the perched layers can be handled with temporary subdrains and subsequently the permanent retaining wall subdrainage system, in the event dewatering is required, a temporary dewatering system would be installed and operated in accordance with NPDES requirements. Any discharge of groundwater during construction of the Project would occur pursuant to, and comply with, the applicable NPDES permit or industrial user sewer discharge permit requirements. Pursuant to such requirements, the

groundwater extracted would be chemically analyzed to determine the appropriate treatment and/or disposal methods.

Other potential effects to groundwater quality could result from the presence of an underground storage tank (UST) or during the removal of a UST. While no UST or USTs are anticipated to be present within the Development Area, in the unlikely event that USTs are found, suspect materials would be removed in accordance with all applicable federal, state, and local regulations. For example, if underground storage tanks are encountered, prior to removal, applicable permits would be obtained from the LAFD to ensure handling and removal in accordance with applicable standards. Therefore, USTs would not pose a significant hazard on groundwater quality.

There are also risks associated with contaminated soil impacting groundwater quality. In the event contaminated soils are encountered during construction, the nature and extent of the contamination would be determined and appropriate handling, disposal, and/or treatment would be implemented in accordance with applicable regulatory requirements, including SCAQMD Rule 1166. Therefore, compliance with existing regulations would ensure the Project would not create a significant hazard to groundwater quality associated with potentially contaminated soil.

As previously discussed, during on-site grading and building construction, hazardous materials, such as fuels, oils, paints, solvents, and concrete additives, could be used and would therefore require proper management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the potential for hazardous materials to be released into groundwater. Compliance with all applicable federal, state, and local requirements concerning the handling, storage and disposal of hazardous waste would reduce the potential for the construction of the Project to release contaminants into groundwater. In addition, as there are no existing groundwater production wells or public water supply wells within 1 mile of the Project Site, construction activities would not be anticipated to affect existing wells.

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. No further evaluation of this topic in an EIR is required.

Operation

Operational activities that could affect groundwater quality include spills of hazardous materials. 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 underground storage tanks have a greater potential to affect groundwater. However, as discussed above, the Project would not introduce any new USTs that would have the potential to expose groundwater to contaminants. In addition, the Project would comply with all applicable existing regulations that would prevent the Project from affecting or expanding any potential areas of contamination, increasing the level of contamination, or causing regulatory water quality standards at an existing production well to be violated, as defined in the California Code of Regulations, Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act. Therefore, operation of the Project would not result in discharges that would violate any groundwater quality standard or waste discharge requirements.

As discussed above, the Project includes the installation of a capture and use system as a means of treatment and disposal of the volume of water produced by the greater of the 85th percentile storm or the 0.75-inch storm event, which would allow for treatment of the on-site stormwater. 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. No further evaluation of this topic in an EIR is required.

b. Would the project 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. No water supply wells are located at the Project Site or within one mile of the Project Site that could be impacted by construction, nor would the Project include the construction of water supply wells.

The Project would require limited excavation associated with building foundations within the existing below-grade parking levels. Specifically, excavation for the proposed Project would extend approximately 10 feet below the existing parking garage level. Additionally, the Project may include the installation of drilled cast-in-place concrete pile foundations to support the new proposed structure, which may extend to a depth of up to 100 feet. As previously noted, the historically highest groundwater level is approximately 70 feet below grade and groundwater was encountered at depths between 54.5 and 76 feet below the existing site. Therefore, Project construction activities are expected to encounter groundwater. As discussed above, although not anticipated, if dewatering is required, due to the limited and temporary nature of dewatering operations, regional impacts to groundwater supplies and management of the basin would not be considered significant.

Regarding groundwater recharge during operation, the Development Area's existing conditions are approximately 100-percent impervious and there is minimal groundwater recharge potential. With implementation of the Project the impervious area within the proposed Development Area would be reduced 85-percent. As previously discussed, any stormwater that bypasses the capture and use system 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. Therefore, the Project would not interfere substantially with groundwater recharge such that groundwater management would be impeded.

As summarized above and described in detail in the Hydrology Report, included in Appendix IS-6 of this Initial Study, the Project's potential impact on groundwater supplies and groundwater recharge would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

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

Less Than Significant Impact. Construction activities have the potential to temporarily alter existing drainage patterns and flows within the Development Area by exposing underlying soils, modifying flow direction, and making the Development Area temporarily more permeable. 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, the Project would implement a Local SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows. These BMPs are designed to contain stormwater or construction watering on the Project Site such that runoff does not impact off-site drainage facilities or receiving waters. In addition, Project construction activities would occur in accordance with City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion. Thus, with implementation of a Local SWPPP that includes implementation of BMPs, as well as 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 substantial erosion or siltation on- or off-site. As such, construction-related impacts to erosion and siltation would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

No streams or rivers are located on or within the immediate vicinity of the Project Site. Additionally, as previously discussed, the Development Area is approximately 100-percent impervious. The Project would include development of new buildings, paved areas, and landscaped areas. As such, the Project would result in an overall decrease in the amount of impervious surfaces within the Development Area. Specifically, with implementation of the Project, the amount of impervious area within the Development Area is expected to be reduced to approximately 85-percent. As stated in the Hydrology Report, included as Appendix IS-6 of this Initial Study, surface water runoff from the Project would be directed to the existing 36-inch City owned storm drain line that runs along the west side of 8th Street. Furthermore, in accordance with requirements of the City's LID Ordinance, BMPs would be implemented throughout the operational life of the Project to reduce erosion.

Based on the above, the Project would not substantially alter the existing drainage pattern of the Project Site or surrounding area such that substantial erosion or siltation on-site or off-site would occur. Operational impacts to hydrology would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. As indicated above, there are no streams or rivers within or immediately surrounding the Project Site. Construction 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. As noted above, the Project would implement a Local SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows and prevent pollution. These BMPs and erosion control measures would contain and treat, as necessary, stormwater or construction watering on the Project Site so runoff does not impact off-site drainage facilities or receiving waters. 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. As such, construction-related impacts to flooding would be less than

significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

As discussed above, the Development Area is approximately 100-percent impervious. The Project would include development of a new high-rise tower, paved areas, and landscaped areas. As such, the Project would result in an overall decrease in the amount of impervious surfaces within the Development Area. Specifically, with implementation of the Project, the amount of impervious area within the Development Area is expected to be reduced to approximately 85-percent. 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 Development Area, the Project is expected to include the installation of capture and use system as established by the LID Manual. The installed BMP systems would be designed with an internal bypass or overflow system to prevent upstream flooding due to large storm events. The stormwater which bypasses the BMP systems would discharge to an approved discharge point in the public right-of-way. Therefore, with implementation of BMPs to capture and treat stormwater that are not currently present within the Development Area, the Project would decrease the rate or amount of surface runoff in a manner which would not increase runoff and not result in or otherwise increase the potential for flooding on- or off-site. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. As previously discussed, the Project Site is approximately 100-percent impervious. The Project would include development of a new high-rise tower , paved areas, and landscaped areas. As such, the Project would result in an overall decrease in the amount of impervious surfaces within the Development Area. Specifically, with implementation of the Project the amount of impervious area within the Development Area is expected to be reduced to approximately 85 percent. As detailed in the Hydrology Report, included as Appendix IS-6 of this Initial Study, runoff flows would be reduced from approximately 7.19 cubic feet per second (cfs) to approximately 7.17 cfs (approximately 0.28-percent lower than the existing flows). As the Development Area currently does not have BMPs for the management of pollutants or runoff, the Project BMPs required under the City's LID Ordinance would control stormwater runoff and ultimately result in a minor decrease in runoff compared to existing conditions. Consequently, the Project would not increase the amount of stormwater runoff discharging into the existing storm drainage infrastructure. Thus, 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 would be required.

iv. Impede or redirect flood flows?

No Impact. The Project Site is not located within a 100-year flood plain as mapped by the Federal Emergency Management Agency (FEMA) or by the City.[65,66] The Project Site is located within an area designated as FEMA Zone X, which denotes an area with 0.2-percent annual chance flood with average flood depths of less than 1 foot or with drainage areas of less than one mile. In addition, as discussed above, the Project would not cause flooding during a 50-year storm event or result in a permanent adverse change to the movement of surface water on the Project Site. Furthermore, there are no surface water bodies in the vicinity. Thus, the Project would not impede or redirect flood flows. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. As discussed above, the Project Site is not located within a 100-year flood hazard area as mapped by the Federal Emergency Management Agency (FEMA) or by the City.[67,68] In addition, the Safety Element of the City's General Plan does not map the Project Site as being located within a flood control basin or within a potential inundation area.[69] The Project Site is located approximately 13 miles east of the Pacific Ocean, and the Safety Element of the General Plan does not map the Project Site as being located within an area potentially affected by a tsunami.[70] Therefore, no tsunami or tsunami events would be expected to impact the Project Site. No impacts would occur, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

e. Would the project 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, the Los Angeles Regional Water Quality Control Board (LARWQCB) prepares a list of impaired waterbodies in the region, referred to as the 303(d) list. The 303(d) list outlines the impaired waterbody and the specific pollutant(s) for which it is impaired. All waterbodies on the 303(d) list are subject to the development of a Total Maximum Daily Load (TMDL).

The Project Site lies within the Ballona Creek Watershed. Constituents of concern listed for Ballona Creek under California's Clean Water Act Section 303(d) List include Copper, Cyanide, Indicator Bacteria, Lead, Toxicity, Trash, Viruses (enteric) and Zinc. TMDLs that apply to this waterbody have

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65 Federal Emergency Management Agency, Flood Map Service Center, Map Number 06037C1617G, effective on December 21, 2018.

66 City of Los Angeles General Plan Safety Element, November 1996, Exhibit F, 100-Year & 500-Year Flood Plains, p. 57.

67 Federal Emergency Management Agency, Flood Insurance Rate Map, Panel Number 06037C1617G, effective on December 21, 2018.

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

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

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

been recorded by the EPA follows: cadmium, chlordane, copper, lead, polychlorinated Biphenyls (PCBs), silver, zinc, and trash. As discussed above, during construction the Project would be required to implement a Local SWPPP that would set forth BMPs for stormwater and non-stormwater discharges, including, but not limited to, sandbags, storm drain inlets protection, stabilized construction entrance/exit, wind erosion control, and stockpile management, to minimize the discharge of pollutants in stormwater runoff during construction. In addition, the implementation of BMPs required by the City's LID Ordinance during project operation would target pollutants that could potentially be carried in stormwater runoff. As such, construction and operation of the Project would not introduce new pollutants or an increase in pollutants that could conflict with or obstruct any water quality control plans for the Ballona Creek Watershed.

With regard to potential impacts associated with groundwater management, as discussed above in Response to Checklist Question X.a., of this Initial Study, the Project would not expand any potential areas of contamination, increasing the level of groundwater contamination, or cause regulatory water quality standard violations, as defined in the California Code of Regulations, Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act. In addition, the Project is not anticipated to result in releases or spills of contaminants that could reach a groundwater recharge area or spreading ground or otherwise reach groundwater through percolation.

Based on the above, with compliance with existing regulatory requirements and implementation of LID BMPs, the Project would not conflict with or obstruct implementation of a water quality control plan or a sustainable groundwater management plan. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

XI. LAND USE AND PLANNING

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

a. Would the project physically divide an established community?

Less Than Significant Impact. As previously discussed, the Project Site is currently developed with hotel, and commercial uses and associated parking as well as a direct portal to the 7th Street/Metro Central rail station. The Project Site has a General Plan land use designation of Regional Center Commercial and is zoned C2-4D.

The area surrounding the Project Site is highly urbanized and includes a mix of mid- to high-rise buildings containing a variety of uses, including commercial (office, retail and restaurant), multi-family residential, institutional, and parking uses. Properties immediately adjacent to the Project Site are zoned C2-4D with a Regional Center Commercial land use designation. Properties to the north of the Project Site along 7th Street are developed with the mid-rise Roosevelt Lofts and 655 Hope Condos adaptive reuse buildings. These multi-story, mixed-use buildings contain ground floor commercial uses that include various dining establishments. Properties to the south of the Project Site along West 8th Street are improved with two multi-story mixed-use buildings with ground floor commercial uses (8th+Hope Apartments and the Gas Company Lofts). Properties to the east of the Project Site along South Hope Street are improved with mid-rise commercial and retail building, a small religious structure (the Third Church of Christ, Scientist of Los Angeles), and parking facilities.[71] Properties to the west of the Project Site along Flower Street are improved with two multi-story parking garages, a surface parking lot, and a multi-story office building with ground floor commercial uses that include dining establishments.[72] In addition, construction of a 41-story mixed-use building is underway at the intersection of Figueroa Street and 8th Street. In the Project vicinity, beyond these land uses are numerous high-rise commercial and residential buildings that form the Downtown skyline.

As previously discussed, the Project would develop 466 residential units within a new high-rise tower located within the southern half of the Project Site (the Development Area). The existing hotel and commercial uses on the Project Site would be retained, with the exception of approximately 24,342 square feet of existing commercial (theater and retail) uses that would be changed to residential uses (including the new residential lobby). In addition, the rooftop parking level of the existing 9-story parking/retail podium would be enclosed, and two additional levels of parking would be added, increasing the podium to 12 stories. The two existing subterranean levels would be retained. The new tower would be located within and above the existing podium building. The proposed uses and high-rise building would be consistent with other developments located adjacent to and in the general vicinity of the Project Site. Additionally, all proposed development would also occur within the boundaries of the Project Site. Furthermore, the Project Site is fully built out, and the Project does not propose a freeway or other large infrastructure that could divide the existing surrounding community. Therefore, the Project would not physically divide an established community. Impacts related to the physical division of an established community would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Potentially Significant Impact. As discussed in Section 3. Project Description of this Initial Study, the Project requests several discretionary approvals, including a Transfer of Floor Area Rights (TFAR) for the transfer of greater than 50,000 square feet of floor area from the City of Los Angeles-owned Los Angeles Convention Center, a Vesting Tentative Tract Map, a Site Plan Review, a haul route and variances, among other discretionary approvals. Accordingly, further evaluation of this topic in an EIR

[71] A portion of this property is proposed to be redeveloped with a 50-story mixed-use development with 580 residential dwelling units and ground level commercial uses, per Case No. CPC-2017-505-TDR-ZV-SPPA-DD-SPR.

[72] A portion of this property is proposed to be redeveloped with a new 41-story mixed use tower, per Case No. CPC-2016-1950-TDR-SPR-1A.

will be provided to determine the Project's consistency with land use plans, policies or regulations that were adopted for the purpose of avoiding or mitigating an environmental effect.

XII. MINERAL RESOURCES

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

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

No Impact. No mineral extraction operations currently occur on the Project Site and none are proposed by the Project. The Project Site is located within an urbanized area and has been previously disturbed by development. As such, the potential for mineral resources to occur on-site is low. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone or Surface Mining District where significant mineral deposits are known to be present or within a mineral producing area as classified by the California Geologic Survey.[73,74,75] The Project Site is also not located within a City-designated oil field or oil drilling area.[76] Therefore, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

b. Would the project 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. See Response to Checklist Question XII.a., Mineral Resources, above. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

74 State of California Department of Conservation, California Geologic Survey, Aggregate Sustainability in California, 2018.

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

76 City of Los Angeles, Safety Element of the Los Angeles City General Plan, Exhibit E, November 26, 1996, p. 55.

XIII. NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☒	☐	☐	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☒	☐	☐	☐
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

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

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

b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Potentially Significant Impact. Due to the proposed land uses and vibration characteristics (rapid attenuation based on distance from source), operation of the Project would not be anticipated to result in operational vibration impacts. Construction of the Project could generate groundborne noise and vibration associated with demolition, site grading and excavation, other clearing activities, the installation of building footings, and construction truck travel. As such, the Project would have the potential to generate excessive groundborne vibration and noise levels during short-term construction activities. Therefore, further evaluation of this topic will be provided in the EIR.

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

No Impact. The Project site is not located within the vicinity of a private airstrip or airport land use plan. The closest private airstrip or airport is the Los Angeles International Airport, which is located approximately 10.5 miles west of the Project Site. Given the distance between the Project Site and the nearest airport, the Project would not expose people residing or working in the Project area to excessive noise levels. Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic is required.

XIV. POPULATION AND HOUSING

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

a. Would the project 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. As discussed in Section 3, Project Description, of this Initial Study, the Project would construct 466 new residential units. Since the Project would result in the construction of new residential units, the Project would directly induce a new residential population that would contribute to population growth in the vicinity of the Project Site.

Construction

While construction of the Project would create temporary construction-related jobs, the work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, Project-related construction workers would not be anticipated to relocate their household's place of residence as a consequence of working on the Project and, therefore, no new permanent residents would be generated during construction of the Project.

Operation

As previously discussed, the Project would develop 466 new residential units. Based on generation factors from the LADOT's Vehicle Miles Traveled Calculator, the Project's new residential units would

generate approximately 1,049 residents.[77] According to SCAG's 2020–2045 RTP/SCS, the forecasted population for the City of Los Angeles Subregion in 2022 is approximately 4,107,076 persons.[78] As projected by the 2020–2045 RTP/SCS, the City of Los Angeles Subregion is anticipated to have a population of approximately 4,338,110 persons in 2030, the projected occupancy year of the Project.[79] Therefore, the projected population growth between 2022 and 2030 is approximately 231,034 persons. The estimated 1,049 new residents generated by the Project would represent approximately 0.45 percent of the population growth forecasted by SCAG's 2020–2045 RTP/SCS in the City of Los Angeles Subregion between 2022 and 2030. The Project does not include the extension of roads or other infrastructure that would indirectly induce substantial population growth in the area. Therefore, the Project's residents would be well within SCAG's 2020–2045 population projection for the City of Los Angeles Subregion.

According to the 2020–2045 RTP/SCS, the forecasted number of households for the City of Los Angeles Subregion in 2022 is approximately 1,455,138 households.[80,81] As projected by the 2020–2045 RTP/SCS, the City of Los Angeles Subregion is anticipated to have approximately 1,572,655 households in 2030, the projected occupancy year of the Project.[82] Therefore, the projected household growth in the City between 2022 and 2030 is approximately 117,517 households. The Project's 466 residential households added by the Project would constitute approximately 0.40 percent of the housing growth forecasted between 2022 and 2030 by SCAG's 2020–2045 RTP/SCS. The Project would also assist the City in meeting its fair share of regional housing need, provide new housing opportunities, and conform to City and regional policies supporting higher density, compact, infill housing development in an area that is jobs rich and well-served by transit. Therefore, the Project's households would be well within SCAG's 2020–2045 household projection for the City of Los Angeles Subregion.

Overall, while the Project would result in an increase in population, implementation of the Project would provide beneficial impacts by increasing the City's housing stock in order to meet housing needs as required by the Regional Housing Needs Assessment. In addition, the Project would concentrate population growth in an infill development that has existing infrastructure to handle population growth. Therefore, the Project's proposed residential units would not induce substantial unplanned population growth in the area.

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77 City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020.

78 Based on a linear interpolation of SCAG's 2016–2045 data, the 2022 values for population are calculated using SCAG's 2016 and 2045 values to find the average increase between years and then applying that annual increase to each year until 2022.

79 Based on a linear interpolation of SCAG's 2016–2045 data, the 2030 values for population are calculated using SCAG's 2016 and 2045 values to find the average increase between years and then applying that annual increase to each year until 2030.

80 Based on a linear interpolation of SCAG's 2016–2045 data, the 2022 values for housing are calculated using SCAG's 2016 and 2045 values to find the average increase between years and then applying that annual increase to each year until 2022.

81 The SCAG forecast uses the term "households," not housing units. As defined by the U.S. Census Bureau, "households" are equivalent to occupied housing units.

82 Based on a linear interpolation of SCAG's 2016–2045 data, the 2030 values for housing are calculated using SCAG's 2016 and 2045 values to find the average increase between years and then applying that annual increase to each year until 2030.

With regard to employees, since the Project would not include the construction of uses that would generate a substantial number of new employment positions (e.g., new office or retail uses), the Project would not indirectly contribute to employment growth in the vicinity of the Project Site. Therefore, the Project would not cause an exceedance of SCAG's employment projections or induce substantial indirect population or housing growth related to Project-generated employment opportunities.

Based on the above, the Project would not induce substantial population or housing growth. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. As discussed in Section 3, Project Description, of this Initial Study, the Project Site is currently developed with hotel, and commercial uses and associated parking as well as a direct portal to the 7th Street/Metro Central rail station. As no housing currently exists on the Project Site, the Project would not cause the displacement of any persons, housing, or require the construction of housing elsewhere. Therefore, no impacts related to displacement of people or housing would occur. No further evaluation of this topic in the EIR is required.

XV. PUBLIC SERVICES

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

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

a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services?

Potentially Significant Impact. LAFD provides fire protection and emergency medical services for the Project Site. The Project would increase the building square footage on-site and would introduce new residential uses, which could result in the need for additional fire protection services. Therefore, further analysis of this issue will be included in the EIR.

b. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services?

Potentially Significant Impact. Police protection for the Project site is provided by the City of Los Angeles Police Department. The Project would introduce new residential uses to the Project Site, which could result in the need for additional police services. Therefore, the EIR will provide further analysis of this issue.

c. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools?

Less Than Significant Impact. The Project Site is located within the boundaries of the Los Angeles Unified School District (LAUSD). The LAUSD is divided into six local districts.[83] The Project Site is located in Local District–Central.[84] The Project Site is currently served by one primary center (Olympic Primary Center), one elementary school (10th Street Elementary), one middle school (John H. Liechty Middle School), and seven high schools (Belmont Zone of Choice High Schools[85]).[86] As previously discussed, the Project includes the construction of 466 new residential units. Based on LAUSD Student Generation rates, the Project would result in approximately 106 elementary students, 29 middle school students, and 61 high school students in the project area, for a total of approximately 196 students.[87] As such, the Project would create new demand for capacity at the LAUSD schools that serve the Project Site. It should be noted, however, that this analysis does not include students who may enroll in private schools or participate in home-schooling. In addition, this analysis does not account for Project residents who may already reside in the school attendance boundaries and would move to the Project Site. Other LAUSD options that are not accounted for that may be available to Project-generated students include the following:

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83 LAUSD, Board of Education Districts Maps 2015–2016, http://achieve.lausd.net/Page/8652, accessed March 25, 2022.

84 LAUSD, Board of Education Local District—Central Map, May 2015.

85 Belmont Zone of Choice high schools include: Ramon C. Cortines School of Visual & Performing Arts, Edward R. Roybal Learning Center, Belmont Senior High, Miguel Contreras Learning Complex—Academic Leadership Community, Miguel Contreras Learning Complex—Business and Tourism, Miguel Contreras Learning Complex—School of Social Justice, and Miguel Contreras Learning Complex—Los Angeles School of Global Studies

86 Los Angeles Unified School District, Residential School Identifier, http://rsi.lausd.net/ResidentSchoolIdentifier/, accessed March 25, 2022.

87 Los Angeles Unified School District, 2020 Developer Fee Justification Study, March 2020, Table 3.

- Open enrollment that enables students anywhere within the LAUSD to apply to any regular, grade-appropriate LAUSD school with designated open enrollment seats;

- Magnet schools and centers, which are open to qualified students in the LAUSD;

- The Permits With Transportation Program, which allows students to continue to go to the schools within the same feeder pattern of the school they were enrolled in from elementary through high school. The LAUSD provides transportation to all students enrolled in the Permits With Transportation Program regardless of where they live within the LAUSD;

- Intra-district parent employment-related transfer permits that allow students to enroll in a school that serves the attendance area where the student's parent is regularly employed if there is adequate capacity available at the school;

- Sibling permits that enable students to enroll in a school where a sibling is already enrolled; and

- Child care permits that allow students to enroll in a school that serves the attendance area where a younger sibling is cared for every day after school hours by a known child care agency, private organization, or a verifiable child care provider.

Pursuant to SB 50, the Applicant would be required to pay development fees for schools to LAUSD prior to the issuance of the Project's building permit. Pursuant to Government Code Section 65995, the payment of these fees fully addresses Project-related school impacts. Thus, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities (i.e., schools), need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools. Therefore, the Project's impact on schools would be less than significant, and no mitigation measures are required. No further evaluation of this issue in an EIR is required.

d. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for park services?

Less Than Significant Impact.

Construction

Construction of the Project would result in a temporary increase in the number of construction workers at the Project Site. Due to the employment patterns of construction workers in Southern California, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by the Project because construction workers move from construction site to construction site throughout the region as specific jobs are temporary/short-term in nature. Therefore, the construction workers associated with the Project would not result in a notable increase in the residential population of the Project vicinity, or a corresponding permanent demand for parks and recreational facilities in the vicinity of the Project Site.

During Project construction, the use of public parks and recreational facilities by construction workers would be expected to be limited, as construction workers are highly transient in their work locations and are more likely to utilize parks and recreational facilities near their places of residence. There is a potential for construction workers to spend their lunch breaks at parks and recreational facilities that may be located in proximity to the Project Site; however, any resulting increase in the use of such parks and recreational facilities would be temporary and negligible. Furthermore, it is unlikely that workers would utilize parks and recreational facilities beyond a 0.5-mile radius from the Project Site, as lunch breaks typically are not long enough for workers to take advantage of such facilities and return to work within the allotted time (e.g., 30 to 60 minutes).

As such, there would be no impact related to construction activities, as construction workers would not demand and utilize parks services, and no facilities would be burdened such that new or expanded facilities would be required.

Operation

Parks and recreational facilities in the vicinity of the Project Site are primarily operated and maintained by the Los Angeles Department of Recreation and Parks (RAP). Nearby parks and recreational facilities within an approximate 2-mile radius of the Project Site include: 6th and Gladys Street Park (located at 624 E. 6th Street), Alvarado Terrace Park (located at 1342 S. Alvarado Terrace), Art's District Park (located at 501 S. Hewitt Street), City Hall Park (located at 200 N. Spring Street), El Pueblo De Los Angeles Historic Monument (located at 845 N. Alameda Street), Everett Park (located 1010 N. Everett Street), Francis Avenue Community Garden (located at 2909 W. Francis Avenue), Grand Hope Park (located at 900 S. Hope Street), Hoover Pedestrian Mall (located at University Avenue between 30th Street and Hoover Street), Hope and Peace Park (located at 843 S. Bonnie Brae Street), Leo Politi Elementary Community School Park (located at 2481 W. 11th Street), Los Angeles Plaza Park (located at 125 E. Paseo De La Plaza), Ord and Yale Street Park (located at 516 W. Ord Street), Patton Street Pocket Park (located 303-305, 317-327 N. Patton Street), Parque Nativo Lopez (located at 1827 S. Hoover Street), Rockwood Community Park (located at 1571 W. Rockwood Street), Saint James Park (located at 20 S. St. James Park), San Julian Park (located at 312 E. 5th Street), Spring Street Park (located 428 S. Spring Street), Unidad Park (located at 1644-1648 W. Beverly Boulevard), Valencia Triangle (located at 1425 W. 8th Street), 1st and Broadway Civic Center (located at 217 W. 1st Street), Alpine Recreation Center (located at 817 N. Yale Street), Central Recreation Center (located at 1357 E. 22nd Street), Echo Park (located at 751 N. Echo Park Boulevard), Hoover Recreation Center (located at 1010 W. 25th Street), Lafayette Park (located at 625 S. Lafayette Park Place), Lake Street Community Center (located at 227 N. Lake Street), Macarthur (Gen Douglas) Park (located at 2230 W. 6th Street), Pershing Square (located at 525 S. Olive Street), Toberman Recreation Center (located at 1725 S. Toberman Street), Trinity Recreation Center (located at 2415 S. Trinity Street), Vista Hermosa Soccer Field (located at 1301 W. 1st Street), and Elysian Park (located at 929 Academy Road).[88] The City is developing a 1.96-acre park called First and Broadway Civic Center Park, which will feature both landscaped and hardscaped

[88] Written correspondence from Darryl Ford, Superintendent, and Cathie M. Santo Domingo, Assistant General Manager, Los Angeles Department of Recreation and Parks, September 22,2022. Included as Appendix IS-7 of this Initial Study.

areas to accommodate a wide variety of park activities, programs, and events, at the northeast corner of West 1st Street and Broadway in downtown Los Angeles.[89,90]

An increase in the use of existing parks and recreational facilities is directly associated with an increase in the population. As discussed above, the Project would develop 466 new residential units. Based on generation factors from the City of Los Angeles Department of Transportation (LADOT)'s Vehicle Miles Traveled Calculator, the Project's new residential units would generate approximately 1,049 residents.[91]

The Project would provide approximately 54,750 square feet of open space, of which of which 44,750 square feet would be exterior open space. addition, 13,600 square feet of the total exterior common open space would be landscaped. Specifically, the Project would provide exterior and interior common open space for amenities on the Levels 12 and 51 of the proposed high-rise building. On the podium room level (Level 12), approximately 41,250 square feet of residential exterior open space consisting of a variety of amenities, such as a pool deck, lounge areas, and picnic areas with tables and seats. Furthermore, a total of 8,000 square feet of interior residential amenity rooms would be provided on this level consisting of amenities, such as multi-purpose space, lounge areas, co-working areas, and a fitness area. Additionally, on the roof level of the tower (Level 51), approximately 3,500 square feet of exterior open space consisting of amenities, such as lounge and picnic areas, and 2,000 square feet of interior multi-purpose space would be provided. Overall, the Project's proposed open space would exceed the requirements of the LAMC.

Due to the amount, variety, and availability of the proposed open space to be provided within the Project Site, it is anticipated that Project residents would often utilize on-site open space to meet their recreational needs. While the Project's residents and visitors would be expected to use off-site public parks and recreational facilities to some degree, the Project would not be expected to cause or accelerate substantial physical deterioration of off-site public parks or recreational facilities given the provision of on-site open space and recreational amenities. Therefore, the Project would not be expected to cause or accelerate substantial physical deterioration of off-site public parks or recreational facilities. However, compliance with regulatory requirements, including the payment of park fees pursuant to LAMC Section 12.33 would ensure that the Project's potential impacts on parks would not be significant.

Based on the above, the Project would not substantially increase the demand for off-site public parks and recreational facilities and would not require the provision of new or physically altered parks and recreational facilities, the construction of which could cause significant environmental impacts. The payment of in-lieu fees in order to fulfill the Project's obligations under the provisions of LAMC 12.33 would further ensure that the Project's potential impacts on parks would be less than significant, and no mitigation measures are required. No further analysis of the issue in an EIR is required.

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89 Written correspondence from Darryl Ford, Superintendent, and Cathie M. Santo Domingo, Assistant General Manager, Los Angeles Department of Recreation and Parks, September 22,2022. Included as Appendix IS-7 of this Initial Study.

90 City of Los Angeles Bureau of Engineering, 1st and Broadway Civic Center Park Project, https://eng.lacity.org/about-us/divisions/environmental-management/projects/1st-and-broadway-civic-center-park-project, accessed November 16, 2022.

91 City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020.

e. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities?

Less Than Significant Impact. Other public facilities available include libraries. The Los Angeles Public Library (LAPL) provides library services to the City through its Central Library, libraries 72 branch libraries, as well as through Web-based resources. [92] The Project area is served by existing libraries within the Central City Community Plan area, including the Central Library, located 0.21-mile northeast of the Project Site.

The new residential population generated by the Project may result in additional demand for library services provided by the Los Angeles Public Library (LAPL). However, while the new residents generated by the Project would be anticipated to make use of the various libraries serving the Project Site, not all residents would use the library or travel to the same library. Additionally, the Project's residential units would be equipped to receive individual internet service, which provides information and research capabilities that studies have shown to reduce demand at physical library locations.[93,94] The LAPL also provides access to a variety of web-based collections, reducing the demand for physical library locations. Furthermore, the Project would generate revenues to the City's General Fund (in the form of property taxes, sales tax, and business tax, etc.) that could be applied toward the provision of new library facilities and related staffing for any one of the libraries serving the Project Site and vicinity, as deemed appropriate.[95] The Project's revenue to the General Fund would help offset the Project-related increase in demand for library services. With the installation of internet service capabilities throughout the Project Site and the generation of revenues to the City's General Fund that could be applied toward the provision of new library facilities and related staffing, impacts on library facilities would be less than significant, and no mitigation measures are required. No further evaluation of this issue in an EIR is required.

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92 Los Angeles Public Library, Library Directory.

93 Denise A. Troll, How and Why Libraries are Changing: What We Know and What We Need to Know, Carnegie Mellon University, 2002.

94 Carol Tenopir, "Use and Users of Electronic Library Resources: An Overview and Analysis of Recent Research Studies," 2003.

95 City Administrative Officer, City of Los Angeles 2016–2017 Budget Overview, July 2016.

XVI. RECREATION

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

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

Less Than Significant Impact. As discussed above in Response Checklist Question XV.d, parks and recreational facilities in the vicinity of the Project Site are primarily operated and maintained by RAP. Nearby parks and recreational facilities within an approximate 2-mile radius of the Project Site include: 6th and Glady's Street Park (located at 624 E. 6th Street), Alvarado Terrace Park (located at 1342 S. Alvarado Terrace), Art's District Park (located at 501 S. Hewitt Street), City Hall Park (located at 200 N. Spring Street), El Pueblo De Los Angeles Historic Monument (located at 845 N. Alameda Street), Everett Park (located 1010 N. Everett Street), Francis Avenue Community Garden (located at 2909 W. Francis Avenue), Grand Hope Park (located at 900 S. Hope Street), Hoover Pedestrian Mall (located at University Avenue between 30th Street and Hoover Street), Hope and Peace Park (located at 843 S. Bonnie Brae Street), Leo Politi Elementary Community School Park (located at 2481 W. 11th Street), Los Angeles Plaza Park (located at 125 E. Paseo De La Plaza), Ord and Yale Street Park (located at 516 W. Ord Street), Patton Street Pocket Park (located 303-305, 317-327 N. Patton Street), Parque Nativo Lopez (located at 1827 S. Hoover Street), Rockwood Community Park (located at 1571 W. Rockwood Street), Saint James Park (located at 20 S. St. James Park), San Julian Park (located at 312 E. 5th Street), Spring Street Park (located 428 S. Spring Street), Unidad Park (located at 1644-1648 W. Beverly Boulevard), Valencia Triangle (located at 1425 W. 8th Street), 1st and Broadway Civic Center (located at 217 W. 1st Street), Alpine Recreation Center (located at 817 N. Yale Street), Central Recreation Center (located at 1357 E. 22nd Street), Echo Park (located at 751 N. Echo Park Boulevard), Hoover Recreation Center (located at 1010 W. 25th Street), Lafayette Park (located at 625 S. Lafayette Park Place), Lake Street Community Center (located at 227 N. Lake Street), Macarthur (Gen Douglas) Park (located at 2230 W. 6th Street), Pershing Square (located at 525 S. Olive Street), Toberman Recreation Center (located at 1725 S. Toberman Street), Trinity Recreation Center (located at 2415 S. Trinity Street), Vista Hermosa Soccer Field (located at 1301 W.

1st Street), and Elysian Park (located at 929 Academy Road).[96] The City is developing a 1.96-acre park called First and Broadway Civic Center Park, which will feature both landscaped and hardscaped areas to accommodate a wide variety of park activities, programs, and events, at the northeast corner of West 1st Street and Broadway in downtown Los Angeles.[97,98]

As previously discussed, while the population increase associated with the Project could generate additional demand for parks and recreational facilities in the vicinity of the Project Site, the Project would comply with the City's requirements in LAMC Section 12.33 through the payment of park fees. In addition, the Project would comply with applicable open-space requirements with respect to the Project's residential component. As discussed above, the Project would provide approximately 54,750 square feet of open space, of which of which 44,750 square feet would be exterior open space. In addition, 13,600 square feet of the total exterior common open space would be landscaped. Specifically, the Project would provide exterior and interior common open space for amenities on the Levels 12 and 51 of the proposed high-rise building. On the podium room level (Level 12), approximately 41,250 square feet of residential exterior open space consisting of a variety of amenities, such as a pool deck, lounge areas, and picnic areas with tables and seats would be provided. Furthermore, a total of 8,000 square feet of interior residential amenity rooms would be provided on this level consisting of amenities, such as multi-purpose space, lounge areas, co-working areas, and a fitness area. Additionally, on the roof level of the tower (Level 51), approximately 3,500 square feet of exterior open space consisting of amenities, such as lounge and picnic areas, and 2,000 square feet of interior multi-purpose space would be provided. Overall, the Project's proposed open space would exceed the requirements of the LAMC.

Due to the amount, variety, and availability of the proposed open space and recreational amenities provided within the Project Site, including publicly accessible open space, it is anticipated that Project residents and employees would often utilize on-site open space and common areas to meet their recreational needs. Thus, while the Project's residents would be expected to utilize off-site public parks and recreational facilities to some degree, the Project would not substantially increase the demand for off-site public parks and recreational facilities such that substantial physical deterioration of those facilities would occur or be accelerated. In addition, pursuant to Section 12.33 of the LAMC, the Applicant would be required to comply with applicable park fee requirements with regard to the residential component of the Project, which would be used to increase recreational opportunities for project residents and improve existing parks, both of which would reduce the Project resident's use of existing parks and recreational facilities and/or address any deterioration of those facilities. Thus, based on the above, the Project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated, and impacts would be less than significant. No mitigation measures are required, and no further analysis of the issue in an EIR is required.

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96 Written correspondence from Darryl Ford, Superintendent, and Cathie M. Santo Domingo, Assistant General Manager, Los Angeles Department of Recreation and Parks, September 22,2022. Included as Appendix IS-7 of this Initial Study.

97 Written correspondence from Darryl Ford, Superintendent, and Cathie M. Santo Domingo, Assistant General Manager, Los Angeles Department of Recreation and Parks, September 22,2022. Included as Appendix IS-7 of this Initial Study.

98 City of Los Angeles Bureau of Engineering, 1st and Broadway Civic Center Park Project, https://eng.lacity.org/about-us/divisions/environmental-management/projects/1st-and-broadway-civic-center-park-project, accessed November 16, 2022.

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

Less Than Significant Impact. As discussed above, the Project would provide approximately 54,750 square feet of open space, of which of which 44,750 square feet would be exterior open space. addition, 13,600 square feet of the total exterior common open space would be landscaped. Specifically, the Project would provide exterior and interior common open space for amenities on the Levels 12 and 51 of the proposed high-rise building. On the podium room level (Level 12), approximately 41,250 square feet of residential exterior open space consisting of a variety of amenities, such as a pool deck, lounge areas, and picnic areas with tables and seats would be provided. Furthermore, a total of 8,000 square feet of interior residential amenity rooms would be provided on this level with amenities consisting of multi-purpose space, lounge areas, co-working areas, and a fitness area. Additionally, on the roof level of the tower (Level 51), approximately 3,500 square feet of exterior open space consisting of amenities, such as lounge and picnic areas, and 2,000 square feet of interior multi-purpose space would be provided. Overall, the Project's proposed open space would exceed the requirements of the LAMC. The Project would not require the construction or expansion of recreational facilities beyond the limits of the Project Site. Although the Project may place some additional demands on park facilities as new residents are introduced into the area, the increase in demand would be met through a combination of on-site amenities, existing parks in the Project vicinity, and payment of park fees, as discussed above. The Project's potential increased incremental demand upon recreational facilities would not in and of itself result in the construction of a new park, which might have an adverse physical effect on the environment. In addition, the recreational facilities included as part of the Project would not have a significant adverse effect of the environment, as discussed throughout this Initial Study. Therefore, the Project would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment and impacts would be less than significant. No mitigation measures are required, and no further analysis of the issue in an EIR is required.

XVII. TRANSPORTATION

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

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

Potentially Significant Impact. A Transportation Assessment (TA) in accordance with LADOT's Transportation Assessment Guidelines (TAG) will be prepared for the Project. In accordance with the TAG and consistent with the City CEQA Transportation Thresholds (adopted July 30, 2019), the TA's CEQA-required analyses will include an assessment of whether the Project would result in potential conflicts with transportation-related plans, ordinances, or policies. The results of this analysis will be included in the EIR.

b. Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Potentially Significant Impact. SB 743, which went into effect in January 2014, requires the Governor's Office of Planning and Research to change the way public agencies evaluate transportation impacts of projects under CEQA. Under SB 743, the focus of transportation analysis has shifted from driver delay, which is typically measured by traffic level of service (LOS), to a new measurement that better addresses the State's goals on reduction of greenhouse gas emissions, creation of a multi-modal transportation, and promotion of mixed-use developments. CEQA Guidelines Section 15064.3 states that vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts, replacing LOS.

On July 30, 2019, the City adopted the CEQA Transportation Analysis Update, which sets forth the revised thresholds of significance for evaluating transportation impacts as well as screening and evaluation criteria for determining impacts. The CEQA Transportation Analysis Update establishes VMT as the City's formal method of evaluating a project's transportation impacts. In conjunction with this update, LADOT adopted its TAG, which defines the methodology for analyzing a project's transportation impacts in accordance with SB 743. The Project would develop new residential uses on the Project Site. As a result, VMT would increase over existing conditions. Therefore, further analysis of this issue will be provided in the EIR.

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

Less Than Significant Impact. The Project would not introduce hazards due to incompatible uses such as farm equipment. Additionally, the Project would not include new access improvements. As previously discussed, access to the Site would continue to be provided from existing ingress/egress driveways at the southern portion of the Project Site, along Hope Street, 8th Street, and Flower Street. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this issue in an EIR is required.

d. Would the project result in inadequate emergency access?

Potentially Significant Impact. According to the Safety Element of the City's General Plan, the nearest designated disaster route to the Project Site is Figueroa Street, which is located

approximately 430 feet west of the Project Site.[99] While it is expected that the majority of construction activities for the Project would be confined to the Project Site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, both directions of travel would continue to be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. With regard to operation, the Project would not require the permanent closure of any local public or private streets and would not impede emergency vehicle access to the Project Site or surrounding area. In addition, the Project would comply with LAFD access requirements and applicable LAFD regulations regarding safety. However, because the requested haul route and the Transportation Assessment (discussed above in Response to Checklist Question No. XVII.a) are still under review by the City of Los Angeles Department of Transportation (LADOT), the Draft EIR will include a discussion of the site's emergency access during construction activities in light of LADOT's review of the haul route and the Transportation Assessment.

XVIII. 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:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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.	☒	☐	☐	☐

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

[99] City of Los Angeles, Safety Element of the Los Angeles City General Plan, Exhibit H, November 26, 1996, p. 61.

that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?

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

Potentially Significant Impact (a and b). Assembly Bill (AB) 52 established a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in PRC Section 21074. As specified by AB 52, a lead agency must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation.

As previously discussed, the Project would require limited excavation associated with building foundations within the existing below-grade parking levels. Specifically, excavation for the proposed Project would extend approximately 10 feet below the existing parking garage level. However, the Project may include the installation of drilled cast-in-place concrete pile foundations to support the new proposed structure, which would extend to a depth of 100 feet. As such, construction activities could potentially disturb any existing but undiscovered tribal cultural resources. Therefore, the potential exists for the Project to impact a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe. In compliance with AB 52, the City sent out project notification letters dated August 4, 2022, to all applicable tribes. The Gabrieleño Band of Mission Indians—Kizh Nation (Tribe) was the only tribe to respond to the project notification letter. The Tribe requested that the City engage in tribal consultation for the Project. Staff acknowledged the request and is working with the Tribe to set up an initial AB 52 consultation phone call. Further analysis of this topic will be provided in the EIR.

XIX. UTILITIES AND SERVICE SYSTEMS

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

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

Potentially Significant Impact. Water, wastewater, electric power, natural gas, and telecommunication systems consist of two components, the source of the supply (or place of treatment for wastewater), and the conveyance systems (i.e., distribution lines and mains) that link the location of these facilities to an individual development site.

Given the Project's increase in the amount of developed floor area and residential units on the Project Site and the potential corresponding increase in water, electricity, and natural gas demand, further analysis of facilities for water, electricity and natural gas will be provided in the EIR.

With regard to wastewater, construction activities for the Project could result in wastewater generation from construction workers on-site. However, wastewater generation during construction of the Project would be temporary and nominal. Furthermore, construction workers would utilize temporary facilities (such as portable restrooms and hand wash areas) provided by the construction contractor, which would not contribute to wastewater flows to the City's wastewater system. Thus, wastewater generation from Project construction activities would not cause a measurable increase in wastewater flows that would result in the need for new or expanded wastewater treatment facilities.

The Project would require construction of new on-site infrastructure to serve new buildings, and potential upgrades and/or relocations of existing wastewater infrastructure. Construction impacts associated with wastewater infrastructure would primarily be confined to trenching for utility lines and connections to the public infrastructure and would be limited to the on-site wastewater distribution, and minor off-site work associated with connections to the public main. Project contractors would coordinate with the City to identify the locations and depth of all lines prior to ground disturbance. Furthermore, the City would be notified in advance of proposed ground disturbance activities in order to avoid disruption of service. In addition, a standard construction traffic management plan would be implemented during Project construction to ensure that adequate and safe pedestrian and vehicle access remains available within and near the Project Site during construction activities. Overall, Project construction would not require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects. Therefore, impacts to the wastewater conveyance or treatment system associated with construction of the Project would be less than significant.

Wastewater generated by the Project would be conveyed by the existing wastewater conveyance systems for treatment at the Hyperion Water Reclamation Plant (HWRP). The HWRP has a capacity of 450 million gallons per day (mgd),[100] and current average wastewater flows are at approximately 300 mgd.[101] Accordingly, the remaining available capacity at the Hyperion Treatment Plant is approximately 150 mgd.[102]

As shown in Table 5 on page 105, based on sewage generation factors established by the City Department of Public Works, Bureau of Sanitation's (LASAN), the Project would generate a net increase of approximately 55,530 gallons of wastewater per day, or approximately 0.06 mgd, upon completion. The Project's average daily wastewater flow of 0.06 mgd would represent approximately 0.037 percent of the current 150 mgd available capacity of the HWRP.[103] Therefore, Project-generated wastewater would be accommodated by the existing capacity of the HWRP.

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[100] LASAN, Water Reclamation Plants, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p?_adf.ctrl-state=17rft0wb47_739&_adf.ctrl=&_afrLoop=11943624721403694#!, accessed August 11, 2022.

[101] City of Los Angeles Department of Public Works, Bureau of Sanitation, Sewer System Management Plan Hyperion Sanitary Sewer System, January 2019.

[102] 450 mgd - 300 mgd = 150 mgd

[103] 55,530 gpd ÷ 190,200,000 mgd) x 100 = 0.029 (~0.03%)

Table 5
Estimated Project Wastewater Generation

Land Use	No. of Units/ Floor Area	Wastewater Generation Factor (gpd/unit)[a]	Total Wastewater Generation (gpd)
Existing to Be Removed[b]			
Retail	23,888 sf	0.025 gpd/1,000 sf	597
Total Existing to Be Removed			**597**
Proposed			
Residential			
Lounge	56,236 sf	0.05 gpd/1,000 sf	2,812
Studio	83 du	75 gpd/du	6,225
One Bedroom	203 du	110 gpd/du	22,330
One Bedroom+	68 du	110 gpd/du	7,480
Two Bedroom	100 du	150 gpd/du	15,000
Three Bedroom	12 du	190 gpd/du	2,280
Subtotal Wastewater Generation			**56,127**
Less Existing to be Removed			597
Net Wastewater Generation (Proposed – Existing to Be Removed)			**55,530**

sf = square feet

du = dwelling units

gpd = gallons per day

[a] *Based on sewage generation rates provided by the City of Los Angeles Bureau of Sanitation (2012).*

[b] *Wastewater generated by the 454 square feet of theater space to be removed is not included since the removal of this space will not affect the existing wastewater generation.*

Source: KPFF Consulting Engineers, 2022.

A Wastewater Service Information (WWSI) response, included as Exhibit 1 of the Utility Technical Report: Wastewater (Wastewater Report) included as Appendix IS-8 of this Initial Study,[104] was obtained from LASAN to evaluate the capability of the existing wastewater system to serve the Project's estimated wastewater flow. Based on the current approximate flow levels and design capacities in the sewer system and the Project's estimated wastewater flow, the City determined that the existing capacity of the sewer system may be able to accommodate the additional wastewater infrastructure demand created by the Project. Further detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and connection permit for the Project during the Project's permitting process. In addition, Project-related sanitary sewer connections and on-site infrastructure would be designed and constructed in accordance with applicable LASAN and California Plumbing Code standards. Therefore, Project-generated wastewater would be accommodated by the existing treatment system, and Project operations-related

[104] KPFF Consulting Engineers, The Bloc Residential Tower & Signage SUD Project, Utility Technical Report: Wastewater, April 2022. See Appendix IS-8 of this IS.

wastewater infrastructure impacts would be less than significant. Based on the above, the Project would not require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects. As such, impacts would be less than significant, and no mitigation measures are required. No further evaluation of wastewater treatment facilities in an EIR is required.

With regard to stormwater drainage, as discussed above in Response to Checklist Question X.c.iii., the Project Site is approximately 100-percent impervious in the existing condition. The Project would include development of new buildings, paved areas, and landscaped areas. As such, the Project would result in an overall decrease in the amount of impervious surfaces on the Project Site. Specifically, with implementation of the Project the amount of impervious area is expected to be reduced to approximately 85 percent. As previously discussed, the Project Site currently does not have BMPs for the management of pollutants or runoff, the Project BMPs, required under the City's LID Ordinance, would control stormwater runoff and ultimately result in a minor decrease in runoff compared to existing conditions. Consequently, the Project would not increase the amount of stormwater runoff discharging into the existing storm drainage infrastructure. As such, the Project would not create runoff which would exceed the capacity of existing or planned drainage systems. Based on the above, the Project would not require or result in the relocation or construction of new or expanded stormwater drainage facilities, the construction or relocation of which could cause significant environmental effects. As such, impacts would be less than significant, and no mitigation measures are required. No further evaluation of stormwater facilities in an EIR is required.

With respect to telecommunications facilities, the Project would require construction of new on-site telecommunications infrastructure to serve new buildings and potential upgrades and/or relocation of existing telecommunications infrastructure. Construction impacts associated with the installation of telecommunications infrastructure would primarily involve trenching in order to place the lines below surface. However, the Project would ensure vehicle and pedestrian access is maintained throughout construction. In addition, when considering impacts resulting from the installation of any required telecommunications infrastructure, all impacts are of a relatively short duration (i.e., months) and would cease to occur when installation is complete. Installation of new telecommunications infrastructure would be limited to on-site telecommunications distribution and minor off-site work associated with connections to the public system. No upgrades to off-site telecommunications systems are anticipated. Any work that may affect services to the existing telecommunications lines would be coordinated with service providers and the City as applicable. As such, the Project would not require or result in the relocation or construction of new or expanded telecommunications facilities. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of telecommunication facilities in an EIR is required.

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

Potentially Significant Impact. LADWP supplies water to the Project Site. Given the Project's increase in floor area on the Project Site and the associated resident population, the Project would increase demand for water provided by LADWP. Therefore, further analysis of this issue will be provided in the EIR.

c. Would the project 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 discussed above in Response to Checklist Question XIX.a, the Project would generate a net of approximately 55,530 gallons of wastewater per day, or approximately 0.06 mgd, upon completion. Wastewater generated by the Project would be conveyed via the existing wastewater conveyance systems for treatment at the HWRP. The HWRP has a capacity of 450 mgd, and current average wastewater flows are at approximately 300 mgd.[105] Accordingly, the remaining available capacity at the Hyperion Treatment Plant is approximately 150 mgd,[106] and the Project net increase would represent approximately 0.037 percent of this remaining available capacity. As such, the HWRP would have sufficient capacity to accommodate the Project. Therefore, the Project would not result in a determination by the wastewater treatment provider that serves the Project Site that it does not have adequate capacity to serve the Project. As such, the Project's impact on the wastewater treatment provider would be less than significant impact, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

d. Would the project 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. While the LASAN generally provides waste collection services to single-family and some small multi-family developments, private haulers permitted by the City provide waste collection services for most multi-family residential, commercial and institutional developments within the City. Solid waste transported by both public and private haulers is either recycled, reused, or transformed at a waste-to-energy facility, or disposed of at a landfill. Landfills within the Los Angeles County are categorized as either Class III (e.g., landfills permitted to accept non-hazardous and non-designated solid waste) or inert waste landfills. Non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste, such as construction waste, yard trimmings, and earth-like waste, is disposed of in inert waste landfills.[107] Ten Class III landfills and one inert landfill are currently operating within the County.[108] In addition, there is one solid waste transformation facility within Los Angeles County (Southeast Resource Recovery Facility) that converts, combusts, or otherwise processes solid waste for the purpose of energy recovery.[109]

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105 City of Los Angeles Department of Public Works, Bureau of Sanitation, Sewer System Management Plan Hyperion Sanitary Sewer System, January 2019.

106 450 mgd - 300 mgd = 150 mgd

107 Inert waste is waste which is neither chemically or biologically reactive and will not decompose. Examples include sand and concrete.

108 County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2020 Annual Report, October 2021. The ten Class III landfills serving the County include the Antelope Valley Landfill, Burbank Landfill, Calabasas Landfill, Chiquita Canyon Landfill, Lancaster Landfill, Pebbly Beach Landfill, San Clemente Landfill, Whittier (Savage Canyon) Landfill, Scholl Canyon Landfill, and Sunshine Canyon City/County Landfill. Azusa Land Reclamation is the only permitted Inert Waste Landfill in the County that has a full solid waste facility permit.

109 County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2020 Annual Report, October 2021.

Based on the 2020 Countywide Integrated Waste Management Plan (CoIWMP) Annual Report, the most recent report available, the total amount of solid waste disposed at in-county Class III landfills, transformation facilities, and exports to out-of-County landfills was 14.57 million tons in 2020. The total remaining permitted Class III landfill capacity in the County is estimated at 142.67 million tons, with a total estimated daily disposal rate of 36,544 tons per day, and the remaining lifespan of each landfill ranges from 8 to 35 years. The estimated remaining capacity for the County's Class III landfills open to the City of Los Angeles is approximately 132.58 million tons as of December 31, 2020.[110] In addition, the permitted inert waste landfill serving the County is Azusa Land Reclamation.[111] This facility has 64.64 million tons of remaining capacity and an average daily in-County disposal rate of 1,032 tons per day.[112] Los Angeles County continually evaluates landfill disposal needs and capacity through preparation of the CoIWMP Annual Reports. Within each annual report, future landfill disposal needs over the next 15-year planning horizon are addressed in part by determining the available landfill capacity.[113]

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

Construction

As summarized in Table 6 on page 109, to provide for the proposed improvements, the Project would remove approximately 24,342 square feet of existing commercial (theater and retail) uses and construct 466 new residential units. Additionally, as discussed in Section 3, Project Description of this Initial Study, City regulations (Ordinance No. 183,893) require seismic retrofit of the existing non-ductile concrete podium. As part of the seismic retrofit, in order to construct the residential tower, a portion of the existing parking levels and the retail levels of the podium building must be removed to add new structural columns, elevators, stairwells, bicycle parking, mechanical rooms, storage areas, etc.

Pursuant to the requirements of SB 1374,[114] the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of its non-hazardous demolition and construction debris. In addition, pursuant to LAMC Sections 66.32 through 66.32.5 (Ordinance No. 181,519), the Project's construction contractor would be required to deliver all remaining construction and demolition waste generated by the Project to a certified construction and demolition waste processing facility. As discussed above, non-hazardous municipal solid waste is disposed of in

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110 County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020, Appendix E-2 Table 4. This total excludes Class III landfills not open to the City of Los Angeles for disposal (i.e., Scholl Canyon, Whittier, Burbank, Pebbly Beach, and San Clemente). In addition, this total excludes the Calabasas Landfill, as its wasteshed does not include the Project Site.

111 As of 2020, according to the Los Angeles County Integrated Waste Management Plan 2020 Annual Report, the Azusa Land Reclamation facility is the only permitted Inert Waste Landfill in the County that has a full solid waste facility permit.

112 County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2020 Annual Report, October 2021.

113 County of Los Angeles, Department of Public Works. Los Angeles County Integrated Waste Management Plan 2020 Annual Report, October 2021.

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

Table 6
Project Demolition and Construction Waste Generation and Disposal

Land Use	Size	Generation Rate (lbs/sf)[a]	Total (tons)
Demolition Waste			
Retail	23,888 sf	155	1,851
Theater	454 sf	155	35
Podium (Seismic Retrofit)[b]	11,100 sf	—	953[c]
Total Demolition Waste			*2,840*
Construction Waste			
Residential	495,016 sf (466 du)	4.38	1,084
Total Construction Waste			*1,084*
Total Demolition and Construction Waste (prior to diversion)			**3,924**
Total Disposal (After 75% Diversion)			**981**

lbs = pound

sf = square feet

[a] *U.S. Environmental Protection Agency, Estimating 2003 Building-Related Construction and Demolition Materials Amounts, Report No. EPA530-R-09-002, March 2009, Tables 4 and 6.*

[b] *CalEEMod Users Guide, Appendix A, May 2021, page 13.*

[c] *California Department of Resources Recycling and Recovery, Converting Volume to Weight, the rate of 1,855 lbs per 1 cubic yard was used for the 1,207 cubic yards of demolition debris associated with podium.*

Source: Eyestone Environmental, 2022.

Class III landfills, while inert waste, such as construction waste, yard trimmings, and earth-like waste, is disposed of in inert waste landfills. Thus, although the total diversion rate may ultimately exceed 75 percent, this analysis conservatively assumes a diversion rate of 75 percent.

After accounting for mandatory recycling, as shown in Table 6, the Project would result in approximately 981 tons of construction and demolition waste. This amount of construction and debris waste would represent approximately 0.002 percent of the Azusa Land Reclamation Landfill's remaining disposal capacity of 64.64 million tons.[115]

It should be noted that soil export is not included in the calculation of construction waste since soil is not disposed of as waste but, rather, is typically used as a cover material or fill at other construction sites requiring soils import. As reported above, the Azusa Land Reclamation landfill, the County's inert waste landfill, would be able to accommodate waste from the Project's construction activities.

[115] (981 tons ÷ 64.64 million tons) * 100 = 0.002 percent.

Based on the above, Project construction would not 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 and strategies identified in the ColWMP or by the City (refer to Response to Question No. XIX(e) regarding consistency with City solid waste planning goals). Therefore, the Project's potential construction-related impacts on solid waste facilities would be less than significant, and no mitigation measures would be required.

Operation

As shown in Table 7 on page 111, based on solid waste generation factors from LASAN, the Project would generate approximately 989 net tons of solid waste per year. The estimated amount of solid waste is conservative because the waste generation factors do not account for recycling or other waste diversion measures. For example, the estimate does not take into account AB 939, which requires California cities, counties, and approved regional solid waste management agencies responsible for enacting plans and implementing programs to divert 50 percent of their solid waste away from landfills. The estimate also does not take into account compliance with AB 341, which requires California commercial enterprises and public entities that generate 4 or more cubic yards per week of waste, and multi-family housing with five or more units, to adopt recycling practices. Likewise, the analysis does not include implementation of the City's recycLA franchising system, which is expected to result in a reduction of landfill disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent by the year 2025.

The Project's estimated solid waste disposal of 989 net tons per year represents approximately 0.0007 percent of the remaining capacity (132.58 million tons) at the County's Class III landfills that serve the City.[116] The Project's estimated solid waste generation would therefore represent a nominal percentage of the remaining daily disposal capacity of those landfills. As such, Project operation would not 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 or strategies identified in the ColWMP or by the City (refer to Response to Question No. XIX(e) regarding consistency with City solid waste planning goals). Therefore, the Project's potential construction impacts to solid waste facilities would be less than significant, and no mitigation measures would be required.

Furthermore, as described in the 2020 Annual Report, the County will continue to address landfill capacity through the preparation of CoIWMP annual reports. The preparation of each annual report provides sufficient lead time (15 years) to address potential future shortfalls in landfill capacity. Solid waste disposal is an essential public service that must be provided without interruption in order to protect public health and safety, as well as the environment. Jurisdictions in the County of Los Angeles continue to implement and enhance the waste reduction, recycling, special waste, and public education programs identified in their respective planning directives. These efforts, together with countywide and regional programs implemented by the County and the cities, acting in concert or independently, have achieved significant, measurable results, as documented in the 2020 Annual Report.

[116] (989 tons per year ÷ 132.58 million tons) * 100 = 0.0007 percent.

Table 7
Estimated Project Solid Waste Generation

Land Use	Size	Employee Generation Rate[a]	Estimated No. of Employees	Solid Waste Generation Rate[b,c]	Total Generation (tons/year)
Existing to Be Removed[d]					
Retail	23,888 sf	0.002	48	1.05 tn/emp/yr	50
Total Existing to Be Removed					50
Proposed					
Residential	495,016 sf (466 du)	N/A	N/A	2.23 tons/du/yr	1,039
Total with Implementation of Project					1,039
Total Net Increase (prior to diversion)					989

sf = square feet

du = dwelling units

emp = employees

tn = tons

yr = year

[a] *Employee Generation Rates from Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, Table 1, May 2020. Based on the employee generation rate of 2.0 employees per 1,000 square feet for "General Retail" and an employee generation rate of 0.02 employees per seat for "Movie Theater (Theater with Matinee)."*

[b] *Non-residential yearly solid waste generation factors from LASAN City Waste Characterization and Quantification Study, Table 4, July 2002. Assumes rate of 1.05 ton per employee per year (Overall Commercial Sector) for commercial and theater uses.*

[c] *Residential solid waste generation factor based on a rate of 12.23 pounds per household per day (or 2.23 tons per household per year), pursuant to the L.A. CEQA Thresholds Guide.*

[d] *Solid waste generated by the theater space to be removed is not included since the removal of this space will not affect the existing solid waste generation.*

Source: Eyestone Environmental, 2022.

Based on the above, the landfills that serve the Project Site would have sufficient permitted capacity to accommodate the solid waste generated by construction and operation of the Project. Therefore, the Project's potential impacts related to solid waste generation would be less than significant, and mitigation measures are required.

e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): (1) source reduction; (2) recycling and composting; and (3) environmentally safe transformation and land disposal. 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, AB 341, which became effective on July 1, 2012, requires businesses and public entities that generate 4 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 plan also calls for reductions in the quantity and environmental impacts of residue material disposed in landfills. In October 2014, Governor Jerry Brown signed AB 1826, requiring businesses to recycle their organic waste[117] on and after April 1, 2016, depending on the amount of waste generated per week. Specifically, beginning April 1, 2016, businesses that generate 8 cubic yards of organic waste per week were required to arrange for organic waste recycling services. In addition, beginning January 1, 2017, businesses that generate 4 cubic yards of organic waste per week were required to arrange for organic waste recycling services.

The Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City's Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an on-site recycling area or room of specified size.[118] The Project would also comply with AB 939, AB 341, AB 1826, and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. Since the Project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste, impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

XX. WILDFIRE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒

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

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

a. Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

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

c. Would the project 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. Would the project 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 (Checklist Questions XVIII.a. through d.). The Project Site is located in an urbanized, generally flat area, and there are no wildlands or steep slopes located in the vicinity of the Project Site. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone, nor is it located within a City-designated fire buffer zone.[119,120] Therefore, the Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. No impacts regarding wildfire risks or related post-fire conditions would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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[119] City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN 5144-010-401, -405, -408, -421, -422, -423, and -425. The Very High Fire Hazard Severity Zone was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone" shown on Exhibit D of the Los Angeles General Plan Safety Element.

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

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

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

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

Potentially Significant Impact. As discussed above, the Project is located in a highly urbanized area and does not serve as habitat for fish or wildlife species. In addition, no sensitive plant or animal community or special status species occur on the Project Site.[121,122] Therefore, the Project would not 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, or substantially reduce the number or restrict the range of a rare or endangered plant or animal. Additionally, with compliance with existing regulations and adherence to the City's condition of approvals for archaeological and paleontological resources, impacts to unknown archeological and paleontological resources that may be encountered during construction would be less than significant.

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121 CDFW, California Natural Diversity Database, Special Animals List, January 2022.

122 USFWS, ECOS Environmental Conservation Online System, Listed species believed to or known to occur in California, https://ecos.fws.gov/ecp0/reports/ad-hoc-species-report, accessed March 25, 2022.

However, as discussed above, based on a review of the HistoricPlacesLA database, the Project Site falls within the Seventh Street Commercial Historic District. Therefore, the Project would have the potential to impact important examples of the major periods of California history or prehistory. Further evaluation of the Project's potential impacts on historical resources will be included in the EIR.

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

Potentially Significant Impact. The potential for cumulative impacts occurs when the impacts of the Project are combined with impacts from related development projects and result in impacts that are greater than the impacts of the Project alone. Located in the vicinity of the Project Site are other current and reasonably foreseeable projects, the development of which, in conjunction with the Project, may contribute to potential cumulative impacts.

Impacts of the Project on both an individual and cumulative basis will be addressed in the EIR for the following subject areas (or portions thereof): air quality; cultural resources (historical resources); energy; greenhouse gas emissions; land use and planning; noise; public services (police protection and fire protection); transportation; tribal cultural resources; and utilities and service systems (water supply, electric power, and natural gas systems. Topics that have been determined not to have the potential for significant cumulative impacts are discussed below.

Aesthetics—Pursuant to SB 743 and ZI No. 2452, the Project is a residential project on an infill site within a transit priority area, and thus in accordance with PRC Section 21099(d)(1), the Project's aesthetic impacts shall not be considered significant impacts on the environment. Given the level of urbanization and transit in the Project vicinity, the majority of related projects would likewise be subject to SB 743. Any related projects for which aesthetic impacts must be analyzed would be reviewed on a case-by-case basis by the City for compliance with applicable LAMC requirements and for a site-specific review regarding building density, design, and light and glare effects. Therefore, the Project's contribution to aesthetics impacts would not be cumulative considerable.

Agriculture, Forestry Resources, and Mineral Resources—With regard to agriculture, forest resources, and mineral resources, no such resources are located on the Project Site or in the surrounding area. The Project would have no impact on these resources, and therefore could not combine with other projects to result in cumulative impacts. As such, cumulative impacts to agriculture, forest resources, and mineral resources would be less than significant.

Air Quality (Odors)—Due to the site-specific nature, impacts related to other emissions (such as those leading to odors) adversely affecting a substantial number of people are typically assessed on a project-by-project basis. As previously discussed, any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people. With respect to Project operation, the Project would not involve operation of these uses. In addition, on-site trash receptacles would also be contained, located, and maintained in a manner that promotes odor control, and would not result in substantially adverse odor impacts. Impacts would be less than significant, and could not combine with other projects to result in cumulative impacts. As such, cumulative impacts would be less than significant.

Biological Resources—The Project vicinity is highly urbanized, and similar to the Project, other developments occurring in the vicinity would occur on previously disturbed land. The Project Site does not contain any sensitive biological resources, and there are no native or protected trees located on-site or within the adjacent rights-of-way. Like the Project, related projects involving tree removals would be required to comply with the MBTA, which regulates vegetation removal during the nesting season to ensure significant impacts to migratory birds do not occur, and any other site-specific mitigation, as necessary. As such, the Project would not contribute to a cumulative effect associated with biological resources.

Cultural Resources (Archeological Resources and Human Remains)—With regard to impacts related to archaeological resources, as with the Project, each of the related projects is or would be subject to applicable regulations formulated to avoid significant impacts archaeological resources impacts, including but not limited to CEQA mitigation and/or the City's standard COA for archaeological resources. Therefore, with adherence to applicable regulations, the Project and related projects would not result in significant cumulative impacts on archaeological resources.

With regard to impacts related to human remains, if human remains were discovered during construction of any of the related projects, work in the immediate vicinity would be halted, the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5, and disposition of the human remains and any associated grave goods would occur in accordance with PRC Section 5097.91 and 5097.98, as amended. Therefore, with the implementation of regulatory requirements, cumulative impacts related to human remains would be less than significant

Geology and Soils—Due to their site-specific nature, geology and soils impacts are typically assessed on a project-by-project basis or for a particular localized area. Therefore, as with the Project, related projects would address site-specific geologic hazards through the implementation of site-specific geotechnical recommendations and/or mitigation measures. Cumulative development would expose a greater number of people to seismic hazards. However, as with the Project, related projects would be subject to local, State, and federal regulations and standards for seismic safety.

In addition, with regard to impacts related to paleontological resources, as with the Project, each of the related projects is or would be subject to applicable regulations formulated to avoid significant impacts paleontological resources impacts, including but not limited to CEQA mitigation and/or the City's standard COA for paleontological resources. Therefore, with adherence to applicable regulations, the Project and related projects would not result in significant cumulative impacts on paleontological resources.

Hazards and Hazardous Materials—Due to their site-specific nature, hazards and hazardous materials impacts are typically assessed on a project-by-project basis. Therefore, as with the Project, related projects would address site-specific hazards through the implementation of site-specific recommendations and/or mitigation measures. In addition, as with the Project, all related development located in the vicinity of the Project Site would be subject to local, regional, state, and federal regulations pertaining to hazards and hazardous materials. Therefore, with adherence to applicable regulations and implementation of site-specific recommendations and/or mitigation measures, cumulative would be less than significant.

Hydrology and Water Quality—Related projects could potentially result in an increase in surface water runoff and contribute point and non-point source pollutants to nearby water bodies. However, as with the Project, related projects would be subject to the City's LID requirements. In addition, construction projects greater than one acre would be subject to NPDES permit requirements, including development of a Stormwater Pollution Prevention Plan, Standard Urban Stormwater Mitigation Plan requirements during operation, and other local requirements pertaining to hydrology and surface water quality, while smaller construction projects would be subject to local erosion control regulations, including the requirement to prepare a Local SWPPP. It is anticipated that related projects would also be evaluated on an individual basis by City of Los Angeles Department of Public Works to determine appropriate BMPs and treatment measures to avoid significant impacts to hydrology and surface water quality. The Project would also improve runoff conditions compared to existing conditions. Thus, with implementation of standard regulatory requirements, Project impacts related to hydrology and water quality would not be cumulatively considerable and, cumulative impacts would be less than significant.

Land Use (Physically Divide Community)—As discussed above, the Project would be implemented within the boundaries of the Project Site, and the Project Site is fully built and does not propose a freeway or other large infrastructure that could divide an established community. As such, Project-level impacts related to physically dividing an established community would be less than significant. Given that the Project Site and surrounding area are already developed and no new large infrastructure improvements (e.g., roadways or freeways) are proposed, the Project could not combine with other projects in the vicinity of the Project Site to result in cumulative impacts associated with the division of a community. Cumulative impacts would be less than significant.

Noise (Private airstrip or an airport land use plan)—Due to the site-specific nature, impacts related to projects exposing people that reside or work in the vicinity of related projects to excessive noise levels from a private airstrip or airport are typically assessed on a project-by-project basis. The Project Site is not located in the vicinity of a private airstrip or within an area subject to an airport land use plan. The Project would have no impact, and therefore could not combine with other projects to result in cumulative impacts. As such, cumulative impacts would be less than significant.

Population and Housing—The Project's incremental contribution to potential cumulative impacts would not be cumulatively considerable. As discussed above, the estimated 1,049 new residents generated by the Project would represent approximately 0.45 percent of the population growth forecasted by SCAG in the City of Los Angeles Subregion between 2022 and 2030, and the 466 new residential units would constitute up to approximately 0.40 percent of the housing growth forecasted in the Subregion between 2022 and 2030. As discussed in the analysis above, the housing and population generated by the Project would be well within SCAG growth forecasts. While the Project would not displace housing or people, other projects might displace existing housing and people residing in them. However, even if construction of replacement housing were required elsewhere, such developments would likely occur on infill sites within the City and the appropriate level of environmental review would be conducted to analyze the extent to which the related projects could cause significant environmental impacts. Moreover, since the Project does not result in any displacement, the Project's contribution would not be cumulatively considerable. Overall cumulative impacts related to population and housing would be less than significant.

Public Services (Schools, Parks, and Libraries)—With regard to schools, the Project would include the development of new residential land uses, which directly generate school-aged children and an increase in the number of students within the service area of the LAUSD. However, the Project would be required to pay school fees in accordance with Section 65995 of the Government Code, which would constitute full and complete mitigation of a project's impacts on school facilities. Similarly, while the demand on school facilities from related projects could also directly generate school-aged children and result in an increased demand on LAUSD school facilities, such related projects would also be required to comply with fee requirements. As such, payment of fees by the related projects would also result in full and complete mitigation of impacts on school facilities. Therefore, Project impacts on the school facilities would not be cumulatively considerable, and cumulative impacts would be less than significant.

With regard to parks, As discussed above, the Project would include the development of new residential land uses, which may result in an increase in the use of existing parks and recreational facilities. However, similar to the Project, each development project would be required to pay park fees pursuant to Section 12.33 of the LAMC, as appropriate to the projects' location and proposed uses. The payment of fees would mitigate any potential impacts to park and recreational facilities. Therefore, overall, the cumulative impact associated with parks would be less than significant, and the Project's contributions to cumulative impacts would not be cumulatively considerable.

With regard to other public facilities (i.e. libraries), the Project would include the development of new residential land uses, which may result in additional demand for library services provided by the LAPL. However, similar to the Project, each development project would generate revenues to the City's General Fund (in the form of property taxes, sales tax, business tax, etc.) that could be applied toward the provision of new library facilities, staffing, and materials for any one of the libraries serving the Project area, as deemed appropriate. These revenues to the City's General Fund would help offset the increase in demand for park facilities and library services as a result of the Project and the related projects. Therefore, the Project and related projects would not result in significant cumulative impacts with respect libraries.

Utilities and Service Systems (Wastewater, Stormwater, Telecommunications)—With regard to wastewater, similar to the Project, new development projects occurring in the Project vicinity would be required to coordinate with LASAN to determine adequate sewer capacity. In addition, new development projects would also be subject to LAMC Sections 64.11 and 64.12, which require approval of a sewer permit prior to connection to the sewer system. In order to connect to the sewer system, related projects in the City of Los Angeles would be subject to payment of the City's Sewerage Facilities Charge. Payment of such fees would help offset the costs associated with infrastructure improvements that would be needed to accommodate wastewater generated by overall future growth. If system upgrades are required as a result of a given project's additional flow, arrangements would be made between the related project and LASAN to construct the necessary improvements. Furthermore, each related project would be required to comply with applicable water conservation programs, including the City of Los Angeles Green Building Code. Therefore, Project impacts on the City's wastewater infrastructure would not be cumulatively considerable, and cumulative impacts would be less than significant.

Development of the Project and related projects could require new or expanded telecommunications infrastructure. As with the Project, the installation of any required telecommunications infrastructure

associated with the related projects would occur during a relatively short duration and would be limited to on-site telecommunications distribution and minor off-site work associated with connections to the public system. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to telecommunication infrastructure. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

With regard to solid waste, given the level of urbanization present throughout the Project vicinity, it is anticipated that other projects would similarly represent a minor percentage of the remaining capacity of the County's Class III landfills open to the City. The demand for landfill capacity is continually evaluated by the County through preparation of the CoIWMP annual reports. Each annual CoIWMP report assesses future landfill disposal needs over a 15 year planning horizon. Based on the 2020 CoIWMP, the County anticipates that future disposal needs can be adequately met for the next 15 years (i.e., 2035) with implementation of strategies to maximize waste reduction and recycling, expand existing landfills, promote and develop alternative technologies, expand transfer and processing infrastructure, and use out of county disposal, including waste by rail. The preparation of each annual CoIWMP provides sufficient lead time (15 years) to address potential future shortfalls in landfill capacity. Therefore, the Project would not contribute considerably to cumulative solid waste impacts, and cumulative solid waste impacts would be less than significant.

Wildfire—The Project Site is located in an urbanized area and there are no wildlands located in the vicinity of the Project Site. Therefore, the Project would not contribute to an increased wildfire risk. Moreover, the Project and related projects would be developed in accordance with LAMC and LAFD requirements pertaining to fire safety. The Project and related projects would not result in significant cumulative impacts with respect to wildfires. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

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

Potentially Significant Impact. Based on the analysis contained in this Initial Study, the Project could result in potentially significant impacts with regard to the following topics: air quality; cultural resources (historic); energy; greenhouse gas emissions; land use and planning (consistency with plans); noise; public services (police protection and fire protection); transportation; tribal cultural resources; and utilities and service systems (water supply, electric power, and natural gas systems). As a result, these potential effects will be analyzed further in the EIR.