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

INITIAL STUDY

130 College Project

Case Number: ENV-2023-2307-EIR

Project Location: 110–130 West College Street, 117–119 West Bruno Street, and 943–973 North Main Street, Los Angeles, CA 90012

Community Plan Area: Central City North

Council District: 1—Hernandez

Project Description: The 130 College Project (Project) proposes the removal of the existing surface parking lot, to construct a new five-story with one mezzanine parking level, 232,802-square-foot commercial development consisting of 224,597 square feet of office, 4,095 square feet of restaurants, and 4,110 square feet of retail on an approximately 2.2-acre site, resulting in a Floor Area Ratio (FAR) of 2.42:1. The Project would have a maximum height of 88 feet and includes parking in one subterranean level, one at-grade level, and one above-grade mezzanine level.

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

PREPARED BY:
Eyestone Environmental, LLC

APPLICANT:
S&R Partners, LLC

June 2024

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1 INTRODUCTION

An application for the proposed 130 College Project (Project) was submitted to the City of Los Angeles (City) Department of City Planning for discretionary review. The City, 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 evaluates the potential environmental effects that could result from the construction, implementation, and operation of the Project. This Initial Study has been prepared in accordance with CEQA (Public Resources Code [PRC] Section 21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations Section 15000 et seq.), and the 2006 L.A. CEQA Thresholds Guide. 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] 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 Project's 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	**130 College Project**
ENVIRONMENTAL CASE NO.	ENV-2023-2307-EIR
RELATED CASES	CPC-2023-2306-GPA-VZC-HD-MCUP-SPR; VTT-84059-CN

PROJECT LOCATION	110–130 West College Street, 117–119 West Bruno Street, and 943–973 North Main Street, Los Angeles, CA 90012
COMMUNITY PLAN AREA	Central City North
GENERAL PLAN DESIGNATION	Regional Commercial
ZONING	[Q]C2-2-RIO and [T][Q]C2-2-RIO
COUNCIL DISTRICT	1—Hernandez

LEAD CITY AGENCY	**City of Los Angeles**
CITY DEPARTMENT	Department of City Planning
STAFF CONTACT	Michael Gatheru
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APPLICANT	**S&R PARTNERS, LLC C/O GRANITE PROPERTIES**
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PHONE NUMBER	(214) 205-4255

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

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.

Michael Gatheru, Planning Assistant	June 4, 2024
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

The 130 College Project (Project) proposes the demolition of an existing surface parking lot to construct a new five-story with one mezzanine parking level, 232,802-square-foot commercial development consisting of 224,597 square feet of office uses, 4,095 square feet of restaurant use, and 4,110 square feet of retail uses, with a floor area ratio (FAR) of approximately 2.42:1 and a maximum height of 88 feet from grade to the top of the mechanical penthouse on an approximately 2.2-acre site (Project Site) in the Central City North Community Plan area of the City of Los Angeles (City). The Project would also include approximately 1,799 square feet of outdoor uncovered dining area adjacent to the ground floor restaurant, which is not considered "Floor Area" as defined in Sections 12.03 and 12.21.1-A(5) of the Los Angeles Municipal Code (LAMC), but is nevertheless counted towards the Project's restaurant area for purposes of this environmental analysis.[2] As such, for the purpose of this environmental analysis, the Project would include the 1,799 square feet of the outdoor uncovered dining area which would total 5,894 square feet of ground floor restaurant space. The Project would have a maximum height of five stories, comprised of a podium with one level of at-grade parking and one mezzanine level of above-grade parking (both podium levels would be wrapped with active ground floor commercial uses along the Alameda Street, Bruno Street, and Main Street frontages and new street trees along College Street where primary vehicle access would be provided), and four levels of office uses above, and with a height of approximately 88 feet measured from grade to the top of the mechanical penthouse consistent with LAMC Sections 12.03 and 12.21.1.B.3. The Project would include approximately 52,716 square feet of outdoor areas.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

The Project Site is located at 110–130 West College Street, 117–119 West Bruno Street, and 943–973 North Main Street within the City's Central City North Community Plan, approximately 15 miles east of the Pacific Ocean. As shown in Figure 1 on page 8 of this Initial Study, the Project Site is bounded by West College Street to the north, North Main Street to the east, Bruno Street to the south, and North Alameda Street to the west.

Local access to the Project Site is provided by West College Street located north of the Project Site, North Main Street located west of the Project Site and North Alameda Street located west of the Project Site. Regional access to the Project Site is provided by the Arroyo Seco Parkway/Harbor Freeway (I-110), the Hollywood Freeway (US-101), and the Golden State Freeway (I-5), which are within approximately one mile of the Project Site. The Project Site is served by a variety of public

[2] LAMC Section 12.03 defines floor area 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 dedicated to bicycle parking, space for the landing and storage of helicopters, and Basement storage areas." LAMC Section 12.21.1-A(5) further states that: "In computing the total floor area within a building, the gross area confined within the exterior walls within a building shall be considered as the floor area of that building, except for the space devoted to bicycle parking, stairways, elevator shafts, light courts, rooms housing mechanical equipment incidental to the operation of buildings, and outdoor eating areas of ground floor restaurants."

Figure 1
Project Location Map

Source: ArcGIS, 2023; Eyestone Environmental, 2023.

transit options, including a number of local and regional bus lines serviced by the Los Angeles County Metropolitan Transit Authority (Metro) and the Los Angeles Department of Transportation (LADOT) that provide connections to Downtown subway stations. In particular, the Project Site is located 0.15 miles southwest of the Metro A Line, which is served by the Chinatown Station located directly across the street from the Project Site on the northwestern corner of the intersection of West College Street and North Spring Street. The Project Site is also located adjacent to stops for Metro Lines 70 and 76, DASH Lincoln Heights/Chinatown route, DASH Downtown Routes A, B, D, and E, and Santa Clarita Transit Lines 794 and 799. Moreover, the Project Site is located approximately 0.5 miles north of Union Station along Alameda Street, which is a hub for all major public transit lines for the region.

3.2.2 Existing Conditions

As shown in the aerial photograph provided in Figure 2 on page 10, the Project Site is currently developed with a surface asphalt parking lot used for bus storage. There are no buildings or landscaping within the Project Site but there is a billboard, parking lights, cargo storage container, six electric bus chargers, and fencing. The Project Site is relatively flat. There are no trees on the Project Site. There are two street trees surrounding the Project Site, both of which are located along Alameda Street. The two street trees consist of various non-native species. Based on the Tree Inventory Report included in Appendix IS-1 of this Initial Study, none of the street trees are "significant" or protected trees as defined by the City of Los Angeles Protected Tree and Shrubs Ordinance No. 186,873.[3,4]

The Project Site is located within the Central City North Community Plan area. On May 3, 2023, the City Council adopted the first reading of the Downtown Community Plan Update (DTLA 2040) Plan, which is a combined update to the Central City and Central City North Community Plans. The City Attorney will review and finalize the implementing ordinances to ensure clarity of regulations and consistency with State law. After the City Attorney review process is complete, the City Council will consider and vote on the DTLA 2040 Plan implementing ordinances, which if adopted, will then go into effect. As such, the Central City North Community Plan is still the operative land use document for the Project Site, and therefore, DTLA 2040 is not applicable to the Project or Project Site. The Project Site is designated as Regional Commercial and is zoned as [Q]C2-2-RIO and [T][Q]C2-2-RIO (Qualified Classification, Commercial Zone, Height District 2, River Improvement Overlay District; and Tentative Zone Classification, Qualified Classification, Commercial Zone, Height District 2, River Improvement Overlay District, respectively).

The C2 Zone allows for a wide range of commercial land uses, including, but not limited to, the Project's proposed office, restaurant, and retail uses. The "2" in the Project Site's zoning designation refers to the Project Site's location in Height District No. 2. Height District No. 2 allows a 6:1 FAR and

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[3] Dudek, 130 West College Street Project, City of Los Angeles, California 90012—City of Los Angeles Tree Inventory Report, January 2023. See Appendix IS-1 of this Initial Study.

[4] Pursuant to City 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.

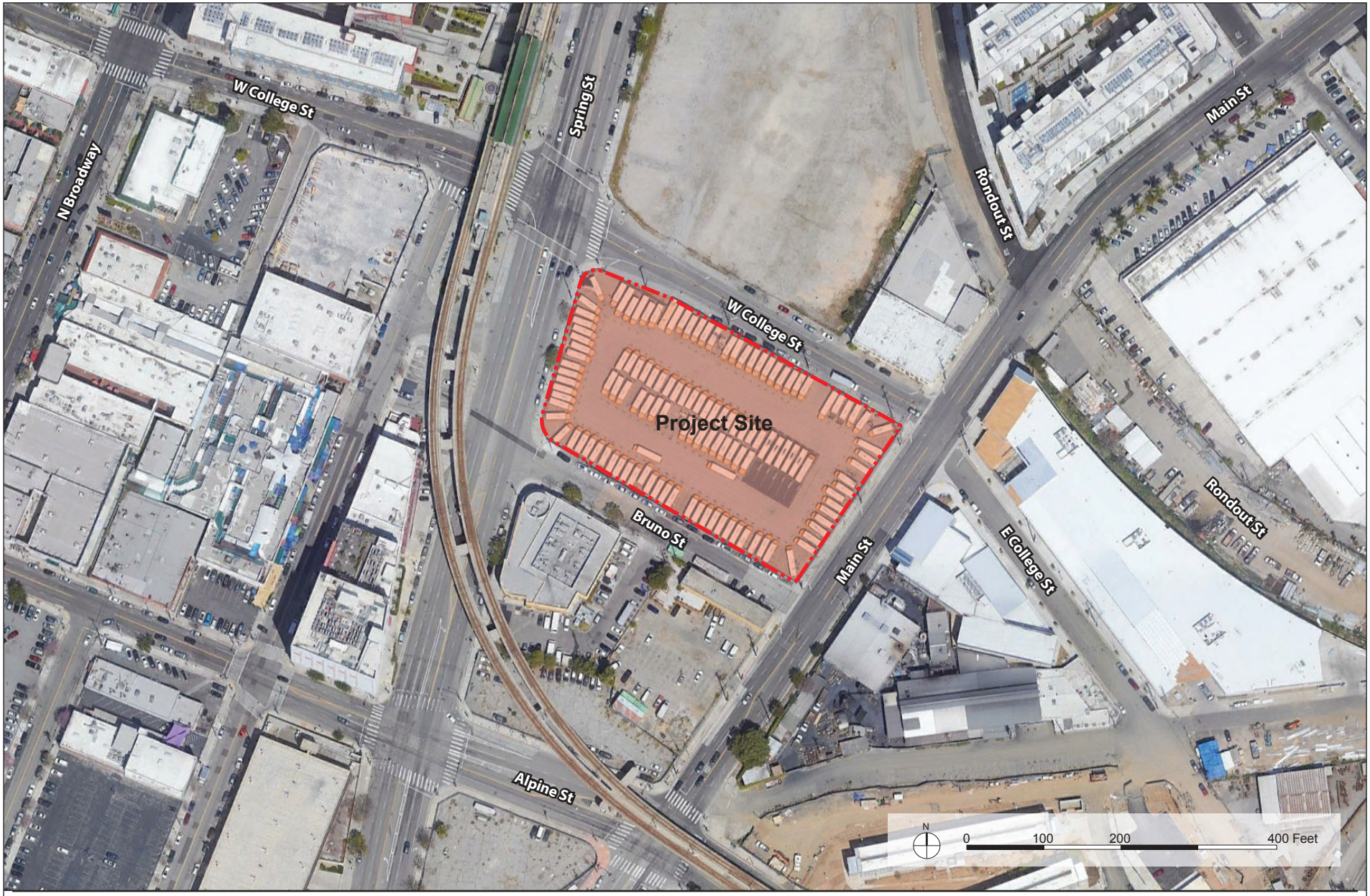

Figure 2

Aerial Photograph of the Project Vicinity

Source: Google Earth Pro, 2023; Eyestone Environmental, 2023.

does not limit building height;[5] however, the Property's "Q" Condition in Ordinance No. 163,510, which applies to the eastern portion of the Property, and Ordinance No. 164,855, which applies to the western portion of the Property, limit the FAR for commercial projects to 1.5:1. The "T" Condition in Ordinance No. 163,510 identifies certain on- and off-site improvement requirements that were imposed as part of, and specific to, a proposed hotel development that was never built, associated with City Planning Case Nos. CPC-1987-350-ZC, ZA-1986-974-CUB, and MND-86-441-CUZ-CU-ZV.

The "RIO" in the Project Site's zoning designation refers to the Project Site's location in the Los Angeles River Improvement Overlay Zone. The RIO does not impose any use, FAR, height, or setback restrictions or standards. Pursuant to LAMC Section 13.17, projects in the Los Angeles River's Outer Core that are not adjacent to the river, including the Project, are required to comply with various screening standards and required to utilize native California plant species in all landscaped areas. As such the the Project would comply with the requirements set forth in LAMC Section 13.17.

The Project Site is also identified by the City in the Zoning Information and Map Access System (ZIMAS) as being in a Transit Priority Area (TPA) as defined by Senate Bill (SB) 743 and the City Zoning Information File (ZI) No. 2452.[6] As described above, the Project Site is located within 0.5 miles of a variety of existing and planned public transit options including the Metro A Line Chinatown Station located directly across the street from the Project Site, and Union Station along Alameda Street served by Amtrak, Metrolink, Metro, LADOT and other local and regional transit agencies.

3.2.3 Surrounding Land Uses

The area surrounding the Project Site is urbanized and includes a mix of low to mid rise buildings containing a variety of industrial, commercial, and residential uses. The surrounding properties are generally zoned C2, which is consistent with the zoning of the Project Site. Directly north of the Project Site, across College Street, includes several parcels zoned as (T)(Q)C2-2-UC(CA) and UC(CA) that are developed with a surface level parking lot with proposals for future mixed-use development and an existing low-rise industrial building, respectively. To the east of the Project Site, across Main Street, are additional properties zoned as UC(CA) and includes existing industrial buildings and a multi-level self-storage facility. To the west of the Project Site, across Almeda Street, are land zoned as C2-2 and comprised of the Metro Light Rail Overpass, which includes the Metro A Line, along with office and residential developments. To the south of the Project Site is land zoned as [Q]C2-2-RIO, and includes additional industrial buildings and another surface parking lot. Additionally, the Granite Block Paving, City Historic Cultural Monument (HCM) #211, is located on Bruno Street adjacent to the Project Site.[7]

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5 FAR and height restrictions can be found at LAMC Section 12.21.1.A.1.

6 SB 743 established new rules for evaluating aesthetic and parking impacts under CEQA for certain types of projects. Specifically, PRC 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 miles of a major transit stop that are existing or planned. The Project is an employment center project on an infill site within a TPA. 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.

7 The historical road segment known as the Granite Paving Block (HCM No. 211) was originally designated as an HCM on March 7, 1979. The designation recognizes the significance as a rare example of hand-hewn granite block paving dating from the early 1900s in Los Angeles.

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

As noted in Section 3.1 of this Initial Study, above, the Project proposes the demolition of an existing surface parking lot to construct a new five-story infill commercial project. As detailed in Table 1, on page 13 of this Initial Study, the Project would develop approximately 232,802 square feet of new uses, comprised of 224,597 square feet of office uses, 4,095 square feet of restaurant uses, and 4,110 square feet of retail uses, resulting in a FAR of approximately 2.42:1. As also described in Section 3.1 of this Initial Study, above, the Project would include approximately 1,799 square feet of outdoor uncovered dining area adjacent to the ground floor restaurant, which is not considered "Floor Area" as defined in the LAMC, but is nevertheless counted towards the Project's restaurant area for purposes of this environmental analysis. As such, for the purpose of this environmental analysis, the Project would include 5,894 square feet of ground floor restaurant space. The Project would have five stories comprised of a podium with one level of at-grade parking and one mezzanine level of above-grade parking (both podium levels would be wrapped with active ground floor commercial uses along the Alameda Street, Bruno Street, and Main Street frontages and new street trees along College Street where primary vehicle access would be provided), and four levels of office uses above, and 88 feet measured from grade to the top of the mechanical penthouse. The Project would include a total of 52,716 square feet of outdoor areas. Approximately 440 vehicular parking spaces would be provided for the Project's proposed uses. Additionally, utility lines for water, sewer, and electric services will require as many as seven trenches be excavated to complete installations that tie-into the nearest existing lines, which are located beneath roads and sidewalks that are outside the direct footprint of the Project Site. For the electrical circuits, Project construction may require existing overhead lines to be placed below ground in trenches. The Project Site is currently occupied by a surface asphalt parking lot, billboard, shipping container, lighting, six electric bus chargers, and fencing, all of which would be demolished to accommodate the Project. A ground floor plan is provided in Figure 3 on page 14 of this Initial Study.

3.3.2 Design and Architecture

The Project includes a five-story building, conceived as a series of three stacked massings that progressively step back from Bruno Street as it rises. As illustrated in Figure 4 through Figure 6 on pages 15 through 17, the Project's architectural concept is a series of cascading terraces that recede into the Project Site from the Bruno Street frontage, by which each terrace provides more open air exposure as the building increases in height.

The Project's proposed retail and restaurant uses would be located on the ground floor to improve the pedestrian environment, and the ceilings within these uses would extend to take up the floor above the ground level. Specifically, the Project's proposed restaurant uses would be located along the corner of Alameda Street and College Street and the retail uses would be located along Main Street near the corner of Main Street and College Street. Pedestrian access to these uses would be provided via two entries on Alameda Street and two entries on Main Street.

Most of the 224,597 square feet of office uses would be located on the Project's upper levels consisting of Levels 2 through 5. The office uses would include a lobby on the ground floor with pedestrian access from Alameda Street and Bruno Street and both interior and exterior work spaces

Table 1
Summary of Existing and Proposed Floor Area[a]

Land Use	Floor Area
Existing (All to Be Removed)	
Surface Parking Lot	0 sf
Total Existing Floor Area to Be Removed	*0 sf*
New Construction (per LAMC)	
General Office	224,597 sf
Restaurant	4,095 sf
Retail	4,110 sf
Total New Construction	*232,802 sf*
Total Floor Area Upon Completion (LAMC)	**232,802 sf**
New Construction (Non-LAMC)[b]	
Restaurant (Outdoor Uncovered Seating)	1,799 sf
Total Square Footage Upon Completion (Non-LAMC)	**234,601 sf**

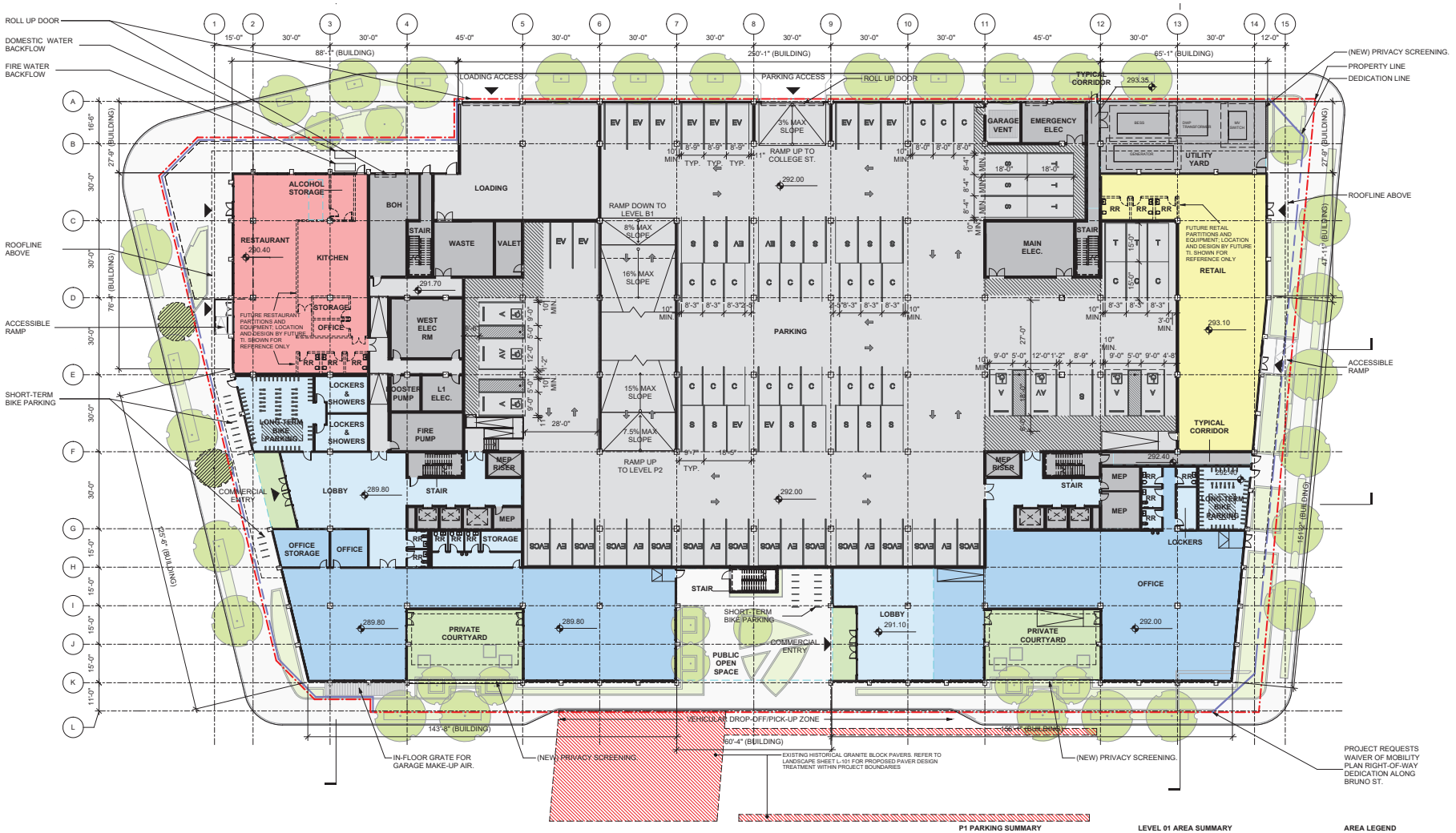
sf = square feet

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

[b] *The Project would include approximately 1,799 square feet of outdoor uncovered dining area adjacent to the ground floor restaurant, which is not considered "Floor Area" as defined in the LAMC, but is nevertheless counted towards the Project's restaurant area for purposes of this environmental analysis. As such, for purposes of this environmental analysis, the Project would include 5,894 square feet of restaurant space.*

Source: Eyestone Environmental, 2024.

totaling approximately 20,018 square feet, programmed along Bruno Street between Alameda and Main Streets. These exterior work spaces include tenant courtyard spaces that would incorporate privacy screening. The office use would also include an outdoor amenity terrace for visitors and occupants totaling 6,243 square feet that would separate the Project into two different sections on Level 2. Floors above Level 2 would continue to be divided leaving a gap in the middle of the Project. Levels 2 and above include exterior covered workspaces that face Bruno Street. Solar panels would be provided within a rooftop structure (the area beneath this rooftop structure would not be occupiable) and a landscaped green roof would be provided over a portion of the proposed parking structure along College Street.



P1 PARKING SUMMARY

TYPE	STALLS
CAR ACCESSIBLE (A)	5
COMPACT (C)	24
EV CAPABLE (EV)	21
EV CHARGING STALLS (EVCS)	12
STANDARD (S)	18
TANDEM (T)	6
VAN ACCESSIBLE (AV)	2
TOTAL STALLS	88

LEVEL 01 AREA SUMMARY

TYPE	AREA
EXTERIOR COVERED SPACE	3,398 SF
OFFICE	17,498 SF
RESTAURANT	4,113 SF
RETAIL	4,132 SF
TOTAL FLOOR AREA	29,141 SF

AREA LEGEND

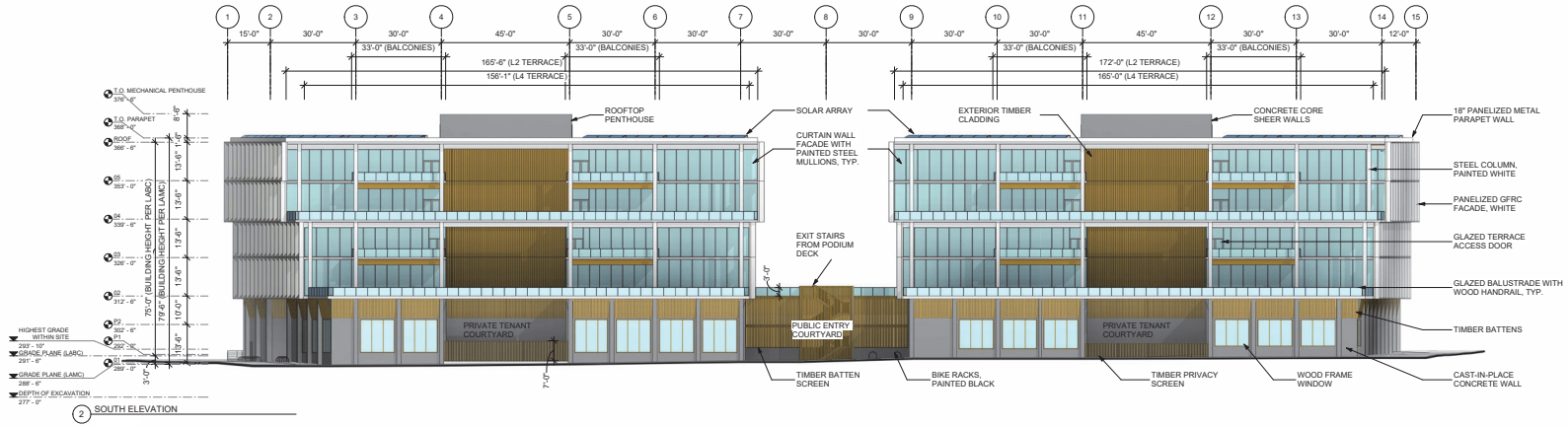
- OFFICE
- EXTERIOR COVERED SPACE
- RETAIL
- RESTAURANT
- BACK OF HOUSE/PARKING

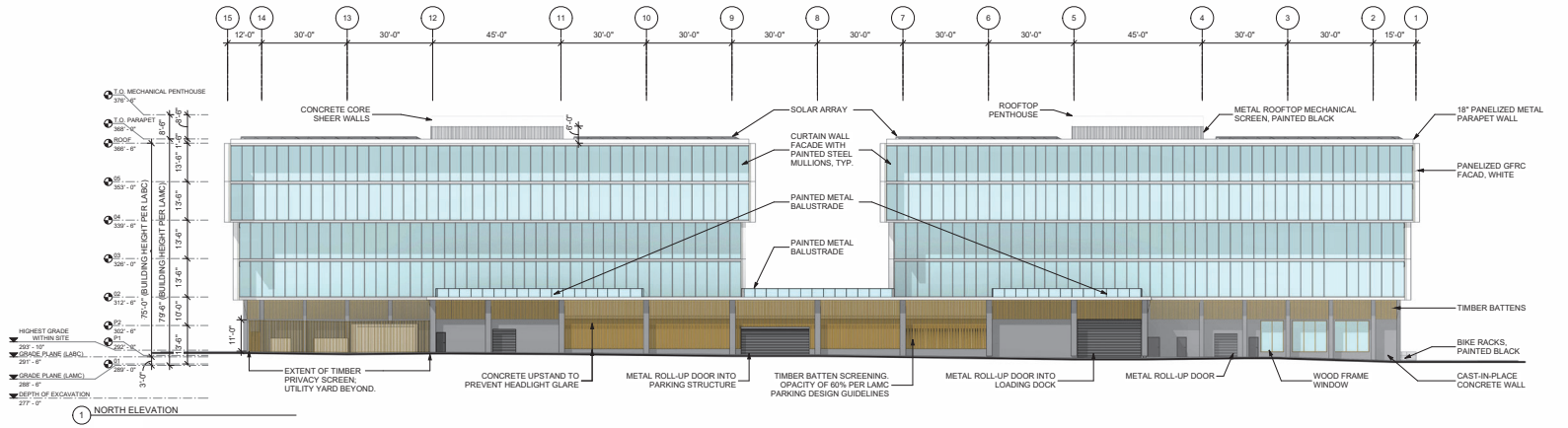
Figure 3
1st Floor Site Plan

Source: Grimshaw Architects LLC, 2024.

Figure 4
Conceptual Rendering

Source: Grimshaw Architects LLC, 2024.





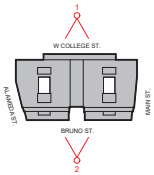
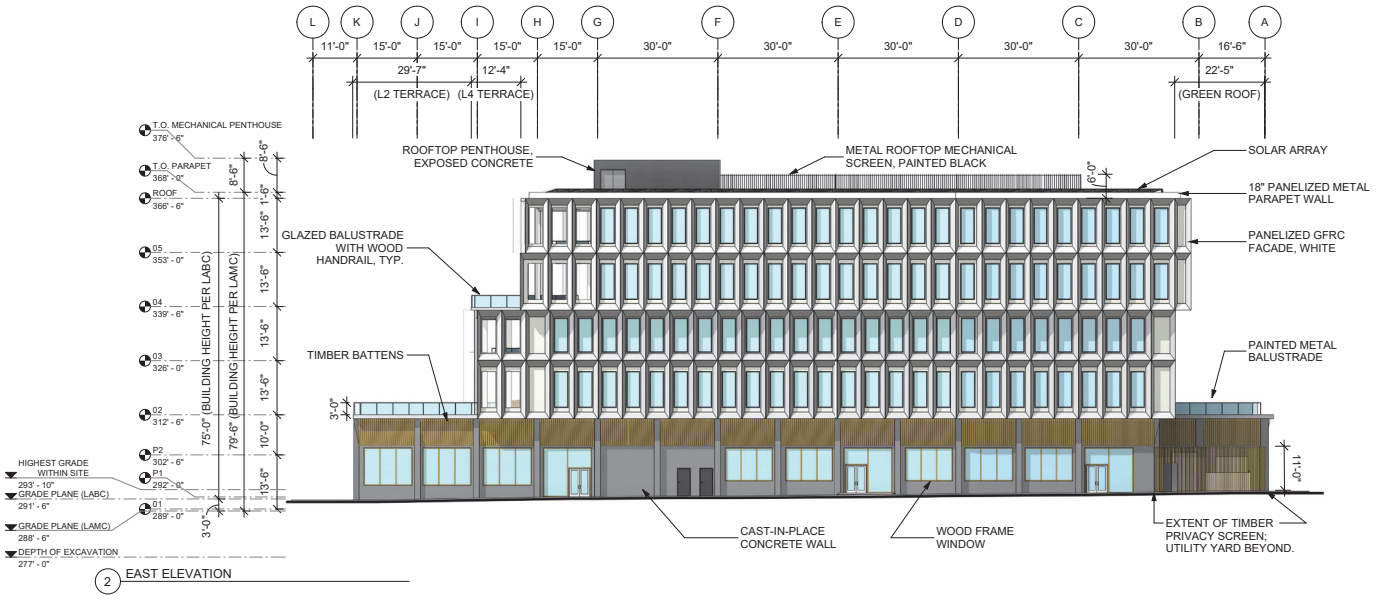
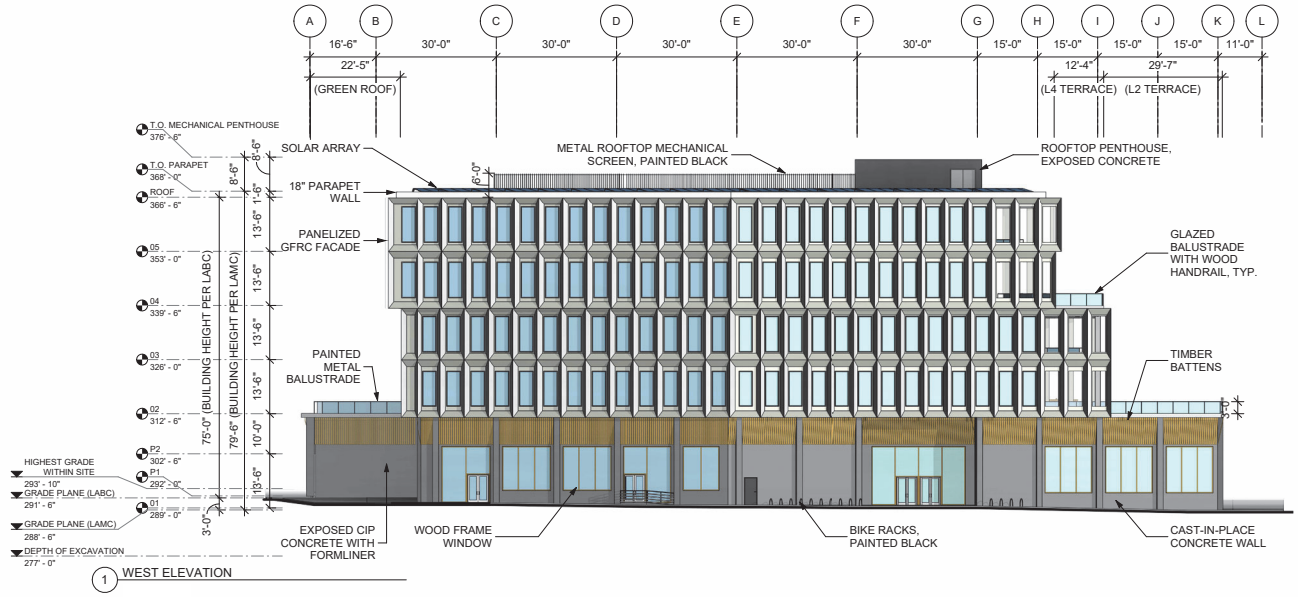


Figure 5
North-South Elevations

Source: Grimshaw Architects LLC, 2024.





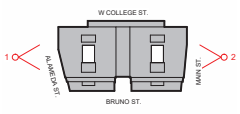


Figure 6
East-West Elevations

Source: Grimshaw Architects LLC, 2024.

Figure 4 on page 15 of this Initial Study provides a conceptual rendering of the Project. As shown, the Project's proposed design provides variable massing, materiality, and texture on the public facing street façades. Materials that are used in the Project's façades include glazed panels, timber battens, textured concrete, and planted green walls. Internally, the Project would utilize a hybrid mass timber structural approach, specifically with cross laminated timber floor and ceiling, along with ample provision for biophilic design including the integration of native plantings and lush landscaping in both the interior workspace as well as the various exterior communal terraces facing the public realm.

3.3.3 Outdoor Areas and Landscaping

As a commercial development, the Project is not required to provide open space in accordance with the LAMC. However, the Project would nonetheless provide landscaping and outdoor areas to enhance the public realm, create more effective transitions between off-site and on-site uses, and provide useable outdoor areas on-site. The Project would have approximately 52,716 square feet of outdoor areas on-site with 33,776 square feet of hardscaping and 18,940 square feet of landscaping. Additionally, the Project proposes approximately 13,575 square feet of exterior space, of which 11,217 square feet is hardscape accessible to the public and 2,358 square feet of landscaping within the public right-of-way at the sidewalk areas adjacent to the Project Site. In total, the Project would provide approximately 28,126 square feet of publicly accessible hardscape and landscape area on- and off-site.

The Project would also enhance the public realm through streetscape improvements that would create a cohesive visual identity for the Project Site. Specifically, the Project would include new landscaping along North Alameda Street, West College Street, North Main Street, and Bruno Street. These perimeter areas would include landscaping such as street trees and shrubs. In addition, the Project would include a landscaped amenity terrace at the second level of the office building, which would create a building break, create a connection between the office levels above the podium, and provide pedestrian circulation, as well as ample open space for use by employees. Additionally, a portion of the terraces provided on Level 3 through 5 facing Bruno Street would be covered.

As mentioned above, exterior covered workspace would be located throughout the Project's office levels and facing Bruno Street. Other outdoor amenities within the Project would include a street plaza and garden which would both be located on the ground floor. The street plaza would be located on the corner of North Alameda Street and West College Street. The street plaza would include an entrance to the Project, outdoor seating, a raised planter, and bicycle parking. The garden would be located near the entrance of the Project along Bruno Street with egress stairs, raised planters, and architectural screening. The Level 2 amenity terrace will contain a valley garden with more raised planters and lounge and movable seating.

The Project would include a cohesive plant palette to be used along the streetscape, within the valley garden, and within the exterior covered workspaces. Plantings would include resilient, drought-tolerant native and adaptive tree, shrub, and groundcover species, including shade trees. The two existing street trees along Alameda Street would be retained as part of the Project. In addition, the Project would plant a total of 67 trees, of which 38 would be located within the Project Site and 29 would be located within the adjacent right-of-way.

3.3.4 Access, Circulation, and Parking

Vehicular and loading access to the Project Site would be provided by two driveways located along West College Street. The driveway closer to the western section of the Project Site along West College Street would be exclusively for loading access, while the other driveway would be the only entrance that would serve to access the Project's parking garage. A passenger drop-off and pick-up area would also be provided along Bruno Street, which is designed to preserve the Granite Block Paving (HCM #211) along Bruno Street consistent with City Planning policy.[8]

The Project is not required to provide a minimum amount of parking pursuant to Assembly Bill (AB) 2097, which is a State law that prohibits public agencies or cities from imposing a minimum automobile parking requirement on most development projects, including commercial developments like the Project, located within a half-mile radius of a major transit stop.[9] However, the Project would provide approximately 440 vehicle parking spaces within one subterranean level, one ground level, and one above ground (mezzanine) level (the at-grade and above-grade parking levels would be wrapped with active ground floor commercial uses along the Alameda Street, Bruno Street, and Main Street frontages and screened with timber battens along College Street).

Additionally, the Project is required to provide 75 bicycle parking spaces pursuant to the LAMC 12.21 A.16(a)(2) for the Project's uses, however the Project would provide approximately 149 bicycle parking spaces, comprised of 123 long-term spaces and 26 short-term spaces, to meet the LAMC 12.21 A.16(a)(2)requirement.

3.3.5 Lighting and Signage

All Project lighting would comply with current energy standards and codes (i.e., California Code of Regulations, Title 24, Part 11; referred to as the CALGreen Code) in effect at the time of construction while providing sufficient light levels to accent signage, architectural features, and landscaping elements. Light sources would be shielded and/or directed toward the Project Site to minimize light spill-over to neighboring properties and the surrounding area while utilizing low-level exterior lights at the site perimeter, as needed, for aesthetic, security, and wayfinding purposes. Additionally, new street and pedestrian lighting within the public right-of-way would provide appropriate and safe lighting levels on both sidewalks and roadways, while minimizing light and glare on adjacent properties, in compliance with applicable City regulations and with approval by the City's Bureau of Street Lighting. Glass in building façades would be selected for qualities such as low reflectivity to reduce glare; energy efficiency to limit solar heat gain; and high visibility for adequate light transmission.

New Project signage would be integrated with and complement the overall aesthetic character of the proposed on-site development and surroundings. Project signage could include general ground-level and wayfinding pedestrian signage around the Project Site perimeter, building identification signs, marquee and monument signs, pillar and pole signs, banners, and other sign types such as on-site

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8 A City Planning memorandum to the City's Department of Public Works, dated August 14, 2007, states that: "Under no circumstances, is the granite paving to be removed or covered in asphalt."

9 City of Los Angeles, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for 130 W. College Street, January 15, 2024.

wall signs, internal digital on-site signage, and mural. Project signage may include both externally and internally lit signs, and LAMC illumination regulations would apply.

3.3.6 Sustainability Features

The Project would support environmental sustainability by incorporating sustainable building features and construction protocols required by the Los Angeles Green Building Code (LAMC Chapter IX, Article 9), the CALGreen Code, and the California Building Energy Efficiency Standards (California Code of Regulations, Title 24, Part 6; referred to as the California Energy Code). Both in compliance with and, in some cases, in exceedance of the aforementioned Code requirements, a number of specific sustainable design components would be incorporated into the Project, such as: Energy Star appliances; solar panels; plumbing fixtures and fittings that comply with the performance requirements specified in the Los Angeles Green Building Code; weather-based irrigation systems; water-efficient plantings with drought-tolerant species; shade trees in public areas; green walls in some outdoor areas; vegetated roofs to help reduce energy use; short- and long-term bicycle parking; storm water capture; pedestrian-first design, employment and commercial activity center near various public transit stops, use of daylighting where feasible; and energy-efficient lighting. For example, the Project would include a 500 kilowatt (kw) solar system with two 250 kw inverters. Such measures would address energy conservation, water conservation, and waste reduction and will be further defined in the EIR to be prepared for the Project.

3.3.7 Anticipated Construction Schedule

Project construction would begin with the demolition of the existing surface parking lot. The next phase would include grading and excavation for the subterranean parking level, which would extend to a depth of up to 17 feet below ground surface as measured from the north-east corner of the Project Site where the grade elevation is the highest. The foundation would then be laid, followed by building construction, and then finally paving and landscaping installation. Project construction is anticipated to be complete in 2028. It is estimated that approximately 67,686 cubic yards of soil would be excavated and would be hauled off the Project Site. Haul trucks would exit the Project Site from the Main Street, Alameda Street, or College Street frontages (haul trucks would not exit the Project Site, or travel along, Bruno Street) and either (1) turn left onto Main Street and continue on Main Street, turn right on Daly Street, then turn right onto Mission Road, turn left onto the I-5 South (San Bernadino Freeway) on-ramp, or (2) turn right onto Main Street, turn left onto Vignes Street, left onto Cesar Chavez Avenue, turn left onto Mission Road to access the I-5 South (San Bernadino Freeway) on-ramp. Empty trucks would take the I-10 West's Vignes Street exit (Exit 2A), then continue north on Vignes Street, then turn right on Main Street, turn into the Project Site from the Main Street, Alameda Street, or College Street frontages (empty trucks would not enter the Project from, or travel along, Bruno Street).

3.4 REQUESTED PERMITS AND APPROVALS

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

- Pursuant to LAMC Section 11.5.6, a General Plan Amendment to amend Central City North Community Plan Footnote No. 7 to allow the FAR for commercial development at the Project Site to exceed 1.5:1;

- Pursuant to LAMC Sections 12.32 F and 12.32 Q a Vesting Zone and Height District Change to change the zoning for the Project Site from [Q]C2-2-RIO and [T][Q]C2-2-RIO to (T)(Q)C2-2D-RIO;

- Pursuant to LAMC Section 12.24 W.1, a Main Conditional Use Permit for the sale and dispensing of a full-line of alcohol beverages for on-site and off-site consumption within up to three (3) establishments, in connection with the proposed restaurant and retail spaces;

- Pursuant to LAMC Section 16.05, Site Plan Review for a development which creates, or results in an increase of, 50,000 gross square feet or more of nonresidential floor area;

- Pursuant to LAMC Sections 17.03 and 17.15, a Vesting Tentative Tract Map for the merger and re-subdivision of 14 lots into one (1) ground lot and 16 airspace lots, and approval of a haul route for 67,791 cubic yards of soil export; and

- Other discretionary and ministerial permits that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, off-site or right-of-way encroachment permits, on-site and off-site tree removal permits, and sign permits.

3.5 RESPONSIBLE PUBLIC AGENCIES

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

3.6 TRUSTEE AGENCIES

A Trustee Agency under CEQA is a State agency that has jurisdiction by law over natural resources affected by a project, that are held in trust for the people of the State of California (PRC Section 21070). To be considered a Trustee Agency for a project, the project must affect natural resources within the agency's jurisdiction (State CEQA Guidelines Section 15386).

According to ZIMAS, the Project Site is located within the Santa Monica Mountains Zone (SMMZ), as mapped by the Santa Monica Mountains Conservancy (SMMC) (PRC Section 33105). During environmental review for discretionary projects, the SMMC is considered a CEQA Trustee Agency over projects that will have an effect on natural resources found within the SMMZ boundaries.[10] As explained in Section II (Agriculture and Forest Resources), Section IV (Biological Resources), and Section X (Hydrology and Water Quality) of this Initial Study, below, the Project Site is located in an urbanized area and is currently developed with asphalt surface parking a billboard, parking lights, cargo storage container, six electric bus chargers, and fencing, and, as such, does not contain any

[10] State of California, Department of Justice, Attorney General Advice Letter re Santa Monica Mountains Conservancy (SMMC) as Trustee Agency, July 26, 2021.

natural resources nor would the Project affect any natural resources over which the SMMC has jurisdiction.

Therefore, the Project would not have an effect on natural resources over which the SMMC has jurisdiction, and as such, the SMMC is not considered a Trustee Agency for the Project.

Nonetheless, in order to ensure that the SMMC agreed that the Project would not have an effect on natural resources over which the SMMC has jurisdiction, the Department of City Planning consulted with the SMMC, and the SMMC confirmed that they should not be considered a Trustee Agency for the Project.[11]

[11] E-mail message from Garrett Weinstein (SMMC) to Jason McCrea (Department of City Planning) on April 10, 2024, Subject: 130 College Street Project.

4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

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

The related City's Department of City Planning ZI File 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."[12]

PRC Section 21099 applies to the Project as an employment center project on an infill site within a TPA. The Project is considered an employment center project because it is located on property that is zoned to permit commercial uses with a maximum FAR greater than 0.75. In addition, the Project Site is an infill site, as the term is defined in PRC Section 21099(a)(4), because the Project Site includes lots located within an urban area that has been previously developed. Lastly, the Project is located within a TPA, as that term is defined in PRC Section 21099(a)(7), because it is located within 0.5 miles of an existing "major transit stop." In particular, the Project Site is located within 0.5 miles of the Metro A Line, which is served by the Chinatown Station located directly across the street from the Project Site on the Northwestern corner of the intersection of West College Street and North Spring Street. The Project Site is also located adjacent to stops for Metro Lines 70 and 76, the DASH Lincoln Heights/Chinatown stop, DASH Downtown Routes A, B, D, and E, and Santa Clarita Transit Lines 794 and 799. Moreover, the Project Site is located approximately 0.5 miles north of Union Station along

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

Alameda Street, which is a hub for all major public transit lines for the region. Therefore, in accordance with PRC Section 21099(d)(1), the Project is exempt from an analysis of aesthetic impacts. The analysis in this Initial Study (or in the EIR, if any aesthetic impact discussion is included), is for informational purposes only and not for determining whether the Project will result in significant impacts to the environment. Any aesthetic impact analysis in this Initial Study (or 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 the EIR) shall trigger the need for any CEQA findings, CEQA analysis, or CEQA mitigation measures.

	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?

Less Than Significant Impact. Pursuant to PRC Section 21099, the Project is an employment center project that would be located on an infill site within a TPA. Therefore, in accordance with PRC Section 21099(d)(1), the Project's aesthetic impacts shall not be considered significant impacts on the environment and therefore do not have to be evaluated under CEQA. As such, Project impacts to aesthetic resources would be less than significant and no further analysis 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?

Less Than Significant Impact. The Project Site is not located along a state scenic highway. The nearest eligible state scenic highway is Interstate 210 (I-210) between Interstate 5 and State Route (SR) 134, located approximately 7 miles northeast of the Project Site and the nearest designated state scenic highway is SR-2 north of Interstate 210, which is located outside the City, approximately

10 miles north of the Project Site.[13] Thus, the Project would not substantially damage scenic resources within a designated scenic highway as there are no scenic highways along the Project Site. Notwithstanding, as described above, pursuant to PRC Section 21099, the Project is an employment center project that would be located on an infill site within a TPA. Therefore, in accordance with PRC Section 21099(d)(1), the Project's aesthetic impacts shall not be considered significant impacts on the environment and therefore do not have to be evaluated under CEQA. As such, Project impacts to aesthetic resources would be less than significant and no further analysis 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?

Less Than Significant Impact. Pursuant to PRC Section 21099, the Project is an employment center project that would be located on an infill site within a TPA. Therefore, in accordance with PRC Section 21099(d)(1), the Project's aesthetic impacts shall not be considered significant impacts on the environment and therefore do not have to be evaluated under CEQA. As such, Project impacts to aesthetic resources would be less than significant and no further analysis 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?

Less Than Significant Impact. Pursuant to PRC Section 21099, the Project is an employment center project that would be located on an infill site within a TPA. Therefore, in accordance with PRC Section 21099(d)(1), the Project's aesthetic impacts shall not be considered significant impacts on the environment and therefore do not have to be evaluated under CEQA. As such, Project impacts to aesthetic resources would be less than significant and no further analysis 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.

[13] Caltrans, List of Designated and Eligible State Scenic Highways, August 2019.

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

a. 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 asphalt surface parking, a billboard, parking lights, cargo storage container, six electric bus chargers, and fencing. No agricultural uses or operations occur on-site or in the vicinity of the Project Site. The Project Site and surrounding area are also not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency Department of Conservation.[14] As such, the Project would not convert farmland to a non-agricultural use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

[14] City of Los Angeles, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for 130 W. College Street, January 15, 2024.

No Impact. The Project Site is zoned as [Q]C2-2-RIO and [T][Q]C2-2-RIO. Pursuant to the LAMC, the C2 Zone permits a wide range of commercial uses including, but not limited to, the proposed office, restaurant, and retail uses.[15] The Project Site is not zoned for agricultural use. Furthermore, no agricultural zoning is present in the surrounding area. The Project Site and surrounding area are also not enrolled under a Williamson Act contract.[16] Therefore, the Project would not conflict with any zoning for agricultural uses or a Williamson Act contract. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR 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 discussed in Section 3, Project Description, of this Initial Study, the Project Site is located in an urbanized area and is currently developed with asphalt surface parking, a billboard, parking lights, cargo storage container, six electric bus chargers, and fencing. The Project Site does not include any forest land or timberland. In addition, the Project Site is currently zoned for commercial uses and is not zoned for forest land and is not used as forest land.[17] Therefore, the Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland as defined by the PRC. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR 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 discussed above, 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 in an EIR 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. The Project Site and surrounding area are also 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.[18] As such, the Project would not result in the conversion of farmland to

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15 City of Los Angeles, Department of City Planning, Generalized Summary of Zoning Regulations, Table 1, Generalized Development Standards, updated March 2020.

16 California Department of Conservation, The Williamson Act Status Report 2020-2021.

17 City of Los Angeles, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for 130 W. College Street, January 15, 2024.

18 City of Los Angeles, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for 130 W. College Street, January 15, 2024.

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 in an EIR 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.

	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 (Air Basin). Within the Air 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[19]). SCAQMD's 2022 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.[20] With regard to future growth, SCAG has prepared the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which provides population, housing, and employment projections for cities under its

[19] Partial Nonattainment designation for lead for the Los Angeles County portion of the Basin only.

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

jurisdiction. 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 would 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, the EIR will provide further analysis of the Project's consistency with SCAQMD's AQMP.

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 would result in the emission of air pollutants in the Air Basin, which is currently in non-attainment of federal air quality standards for ozone, $PM_{2.5}$ and lead, and state air quality standards for ozone, particulate matter less than 10 microns in size (PM_{10}), and $PM_{2.5}$. Construction related pollutants are typically associated with sources such as construction worker vehicle trips, trucks exporting debris or soil, operation of construction equipment, removal of the surface parking lot, site grading and preparation activities, and the application of architectural coatings. During Project operation, air pollutants would be emitted on a daily basis from motor vehicle travel, energy consumption, and other on-site activities. Therefore, implementation of the Project could potentially contribute to air quality impacts, which could cause a cumulative impact in the Air Basin. The EIR will provide further analysis of cumulative air pollutant emissions associated with the Project.

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

Potentially Significant Impact. According to the California Air Resources Board, sensitive receptors include children, the elderly, asthmatics, and others who are at a heightened risk of negative health outcomes due to exposure to air pollution. The locations where these sensitive receptors congregate are considered sensitive receptor locations. 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 to the west and a proposed mixed-use development to the north. Therefore, the Project could expose sensitive receptors to additional pollutant concentrations and the EIR will provide further analysis of the Project's potential to result in substantial adverse impacts to sensitive receptors.

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. As a commercial development with office, restaurant, and retail uses, the Project would not involve the operation of uses typically associated with odor complaints. Additionally, on-site trash receptacles would be contained, located, and maintained in a manner that promotes odor control, and would not result in substantially adverse

odor impacts. Furthermore, construction and operation of the Project would comply with SCAQMD Rules 401, 402, and 403 which would reduce impacts related to visible emissions, public nuisance, and fugitive dust, respectively. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR 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?

No Impact. The Project Site is located in an urbanized area and is currently developed with asphalt surface parking a billboard, parking lights, cargo storage container, six electric bus chargers, and fencing. There is no landscaping within the Project Site, though two street trees are located on N. Alameda Street adjacent to the Project Site. Due to the urbanized and disturbed nature of the Project Site and the surrounding areas, and lack of large expanses of open space areas, species likely to occur on-site are limited to small, common terrestrial and avian species typically found in urbanized developed settings. Based on the lack of habitat on and immediately surrounding the Project Site, as evidenced by the Project Site being currently developed with a surface parking lot and located in an urban setting, there is no evidence of any special status species listed by the California Department of Fish and Wildlife (CDFW)[21] or by the U.S. Fish and Wildlife Service (USFWS)[22] being present on-site. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area as defined by the City.[23] Therefore, the Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the CDFW or USFWS. No impact would occur, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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 asphalt surface parking, a billboard, parking lights, cargo storage container, six electric bus chargers, and fencing. No riparian or other sensitive natural community exists on the Project Site or in the surrounding area.[24,25] 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 of Los Angeles.[26,27] In addition, there are no other sensitive natural communities identified by the CDFW or the USFWS.[28,29,30] Therefore, the Project would not have a substantial adverse effect on any riparian

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21 California Department of Fish and Wildlife, California Natural Diversity Database, Special Animals List, August 2019.

22 United States Fish and Wildlife Service, 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 June 14, 2023.

23 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.

24 City of Los Angeles, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for 130 W. College Street, January 15, 2024.

25 United States Environmental Protection Agency, NEPAssist, https://nepassisttool.epa.gov/nepassist/nepamap.aspx, accessed June 14, 2023.

26 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.

27 Department of Regional Planning, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, February 2015.

28 California Department of Fish and Wildlife, Biogeographic Information and Observation System (BIOS), https://apps.wildlife.ca.gov/bios/, accessed June 14, 2023.

29 California Department of Fish and Wildlife, CDFW Lands, https://apps.wildlife.ca.gov/lands/, accessed June 14, 2023.

30 United States Fish and Wildlife Service, National Wetlands Inventory, www.fws.gov/wetlands/data/Mapper.html, accessed June 14, 2023.

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 asphalt surface parking, a billboard, parking lights, cargo storage container, six electric bus chargers, and fencing. No water bodies or State and federally protected wetlands exist on the Project Site.[31] In addition, construction of the Project would not result in the removal, filling, or other means of hydrological interruption since the Project Site is currently developed with surface parking and does not contain any surface hydrological features. 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. Therefore, 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 Impact. As described above, the Project Site is located in an urbanized area and is currently developed with asphalt surface parking, a billboard, parking lights, cargo storage container, six electric bus chargers, and fencing. In addition, the areas surrounding the Project Site are fully developed, and there are no large expanses of open space areas within and surrounding the Project Site that provide linkages to natural open spaces areas that may serve as wildlife corridors. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City or the County of Los Angeles.[32,33]

According to the Tree Inventory Report prepared for the Project by Dudek in January 2023 and included in Appendix IS-1 of this Initial Study, there are no trees located within the Project Site, and there are two non-protected street trees (i.e., Chinese flame trees) along the Project Site's Alameda Street frontage. The two street trees would be retained as part of the Project. Although they would be retained, the two street trees could potentially provide nesting sites for migratory birds which may be disturbed by Project construction. The Project would comply with the Migratory Bird Treaty Act, which prohibits the take, possession, import, export, transport, sale, 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 & Game Code Section 3503 (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." No exceptions are provided in the code and the CDFW has not promulgated

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31 United States Environmental Protection Agency, NEPAssist, https://nepassisttool.epa.gov/nepassist/nepamap.aspx, accessed June 14, 2023.

32 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.

33 Department of Regional Planning, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, February 2015.

regulations interpreting these provisions. Regulatory compliance with the Migratory Bird Treaty Act and California Fish and Game Code would require that tree removal activities take place outside of the nesting season (February 1–August 31), to the extent feasible. In addition, should vegetation removal activities occur during the nesting season, a biological monitor would be present during the removal activities to ensure that no active nests would be impacted. If active nests are found, a buffer would be established until the fledglings have left the nest. Therefore, with compliance with the Migratory Bird Treaty Act, 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. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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's Protected Tree and Shrub Ordinance (Ordinance 186,873, 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 4 inches in diameter at breast height or 4.5 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. 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 which inflict damage upon root systems 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 included in Appendix IS-1 of this Initial Study, there are no trees located within the Project Site, and there are two non-protected street trees (i.e., Chinese flame trees) along the Project Site's Alameda Street frontage. The two street trees would be retained as part of the Project. 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 an 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 asphalt surface parking, a billboard, parking lights, cargo storage container, six electric bus chargers, and fencing. There is no landscaping within the Project Site, and the Project

Site does not support any habitat or natural community[34,35] Moreover, no Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site.[36] Thus, the Project would not conflict with the provisions of any such plans. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an 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. CEQA Guidelines Section 15064.5 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)). Additionally, 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 Resources, which

[34] City of Los Angeles, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for 130 W. College Street, January 15, 2024.

[35] United States Environmental Protection Agency, NEPAssist, https://nepassisttool.epa.gov/nepassist/nepamap.aspx, accessed June 14, 2023.

[36] California Department of Fish and Wildlife, California Natural Community Conservation Plans, April 2019.

established SurveyLA, a comprehensive program to identify potentially significant historic resources throughout the City. As stated above, there are no buildings on the Project Site, but HCM #211, Granite Block Paving, is located on Bruno Street adjacent to the Project Site. As such, the EIR will include an analysis of potential direct and indirect impacts to historical resources.

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

Potentially 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 previous ground disturbance. Therefore, surficial archaeological resources that may have existed at one time have likely been previously disturbed. The Project would require grading, excavation for the subterranean parking level, which would extend to a depth of up to 17 feet below the existing ground surface; trenching within the public right-of-way for utility connections; and other construction activities that could have the potential to disturb existing but undiscovered archaeological resources. Thus, the Project could have the potential to disturb previously undiscovered archaeological resources. Therefore, the EIR will provide further analysis of the Project's potential impacts to archaeological resources.

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 ground disturbance. Therefore, the potential for uncovering human remains on the Project Site is low. Nevertheless, the Project would require grading, excavation up to 17 feet below ground surface, trenching within the public right-of-way for utility connections, and other construction activities that could have the potential to disturb existing but undiscovered human remains. If human remains are 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 applicable 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 PRC Section 5097.98 and CEQA Guidelines Section 15064.5I, which require 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 determines 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 analysis 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. As discussed above, in Section 3, Project Description, the Project Site is currently developed with asphalt surface parking, a billboard, parking lights, cargo storage container, six electric bus chargers, and fencing. The Project would construct a new 234,802-square-foot commercial building (inclusive of the approximately 1,799 square feet of outdoor uncovered dining area adjacent to the ground floor restaurant, which is not considered "Floor Area" as defined in the LAMC), comprised of 224,597 square feet of office uses, 5,894 square feet of restaurant uses and 4,110 square feet of retail uses. Due to the construction of a new building, 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. 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 Renewable Portfolio Standard (RPS) required retail sellers of electric services to increase procurement from eligible renewable energy resources to 20 percent of total retail sales by 2017.[37] The program was accelerated in 2015 with SB 350 which mandated a 50 percent RPS by 2030. In 2018, SB 100 was signed into law, which again increases the RPS to 60 percent by 2030 and requires all the state's electricity to come from carbon free resources by 2045. LADWP provides electrical service throughout the City. LADWP generates power from a variety of energy sources, including hydropower, coal, gas, nuclear sources, and renewable resources, such as wind, solar, and

[37] CPUC, Renewables Portfolio Standard (RPS) Program, www.cpuc.ca.gov/industries-and-topics/electrical-energy/electric-power-procurement/rps, accessed June 14, 2023.

geothermal sources. In accordance with SB 100, LADWP is required to procure at least 60 percent of its energy portfolio from renewable sources by 2030.

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 2022 Title 24 standards, which became effective on January 1, 2023.[38] The 2022 code update encourages efficient electric heat pumps, expands solar photovoltaic and battery storage standards, strengthens ventilation standards, and more.[39]

As discussed above, the Project Site is currently developed with asphalt surface parking, a billboard, parking lights, cargo storage container, six electric bus chargers, and fencing. The Project would construct a new 234,601-square-foot commercial building comprised of 224,597 square feet of office uses, 5,894 square feet of restaurant uses and 4,110 square feet of retail 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. While the Project would not be anticipated to conflict with or obstruct a state or local plan for renewable energy or energy 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 is*sued 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?	☐	☐	☒	☐

[38] CEC, 2022 Building Energy Efficiency Standards, www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2022-building-energy-efficiency, accessed June 14, 2023.

[39] CEC, 2022 Building Energy Efficiency Standards, www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2022-building-energy-efficiency, accessed June 14, 2023.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 based in part on the Geotechnical Investigation prepared for the Project by Langan Engineering and Environmental Services, Inc. dated February 17, 2023. The report was approved by the Los Angeles Department of Building and Safety (LADBS) on March 1, 2024. All specific information on geologic and soils conditions in the discussion below is from this report unless otherwise noted. This report and LADBS approval letter are included as Appendix IS-2 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.

The Project Site is not located within an Earthquake Fault Zone as mapped by CGS.[40] As noted in Appendix 2, Geotechnical Investigation, dated February 17, 2023, although the nearest fault is the Upper Elysian Fault approximately 0.12 miles north of the Project Site, the closest Alquist-Priolo Fault Rupture Hazard Zone is associated with the Hollywood Fault located approximately 3.6 miles north of the Project Site. Additionally, the Geotechnical Investigation did not identify active surface faulting within or directly adjacent to the Project Site. Therefore, the Project Site is not susceptible to surface fault rupture hazards, and impacts would be less than significant. 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, which would potentially experience moderate to strong seismic ground shaking in the event an 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. According to the Geotechnical Investigation, the closest active fault is the Upper Elysian Fault located approximately 0.12 miles north of the Project Site, and the closest Alquist-Priolo Fault Rupture Hazard Zone is associated with the Hollywood Fault located approximately 3.6 miles north of the Project Site. In addition, 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. Specifically, the State and City mandate compliance with numerous rules related to seismic safety, including the Alquist-Priolo Earthquake Fault Zoning Act, Seismic Safety Act, Seismic Hazards Mapping Act, the City's General Plan Safety Element, and the Los Angeles Building Code. Pursuant to those laws, the Project must demonstrate compliance with the applicable provisions thereof before permits can be issued for construction of the Project. Accordingly, the design and construction of the Project would comply with all applicable existing regulatory requirements, the applicable provisions of the Los Angeles Building Code relating to seismic safety, and the application of accepted and proven construction engineering practices. The Los Angeles Building Code incorporates current seismic design provisions of the 2022 California Building Code, with additional City provisions, to minimize seismic impacts. The 2022 California Building Code incorporates the latest seismic design standards

[40] State of California, California Geological Survey, Earthquake Zones of Required Investigation, https://maps.conservation.ca.gov/cgs/eqzapp/app/, accessed June 13, 2023.

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. 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 LADBS, including the recommendations provided in a final geotechnical report for the Project, which will be subject to review and approval by LADBS.

Based on the above, through compliance with regulatory requirements and site-specific geotechnical recommendations, the Project would not directly or indirectly cause potential substantial adverse effects involving strong seismic ground shaking. Therefore, the Project's impact related to strong seismic ground shaking would be less than significant, and no mitigation measures are required. No further analysis 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 CGS map of Earthquake Zones of Required Investigation for the Hollywood Quadrangle and the County of Los Angeles Seismic Safety Element, the Project Site is located within an area identified as having a potential for liquefaction. In addition, the Project Site is mapped as a liquefaction area by the City.[41] Additional liquefaction analysis was therefore performed as part of the Geotechnical Investigation. Based on the results of that analysis, there are potentially liquefiable soil layers ranging from around 27 to 39 feet below ground surface and liquefaction-induced settlements are anticipated to range from approximately 0.2 to 1.5 inches. As such, the soils underlying the Project Site are characterized as Site Class D and the corresponding seismic design criteria are applicable. In addition, as noted above, the Project would be subject to current building codes. 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 LADBS, including the recommendations provided in a final geotechnical report for the Project, which will be subject to review and approval by LADBS.

Based on the above, with regulatory compliance, impacts related to liquefaction would be less than significant. No further evaluation of this topic in an EIR is required.

[41] City of Los Angeles, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for 130 W. College Street, January 15, 2024.

iv. Landslides?

No Impact. Landslides generally occur in loosely consolidated, wet soil and/or rocks on steep sloping terrain during precipitation, soil disturbance, changes in groundwater, or seismic activity. The Project Site and surrounding area are fully developed and the Project Site is generally characterized by relatively level topography. Large areas of exposed soil and/or rocks that could fall onto the Project Site are not present, since the majority of the Project Site is covered in pavement and landscaping is confined to two ornamental street trees that would remain as part of the Project. In addition, the Project Site is not located in a landslide area as mapped by the State,[42] nor is the Project Site mapped as a landslide area by the City.[43] Therefore, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. 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. The Project Site is currently fully developed with surface parking. As such, there are no open spaces with exposed topsoil. However, development of the Project would require grading, excavation, and other construction activities that have the potential to disturb existing soils underneath the Project Site and expose these soils to rainfall and wind during construction, thereby potentially resulting in soil erosion. This potential would be reduced by implementation of standard erosion controls imposed by applicable regulations during site preparation and grading activities. Specifically, all grading activities would require grading permits from LADBS, 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, excavations, and fills. Furthermore, 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, which can contribute to erosion. Regarding soil erosion during Project operations, the potential would be negligible since the Project Site would mostly remain fully developed. Therefore, with compliance with applicable regulatory requirements, impacts regarding soil erosion or the loss of topsoil would be less than significant, and no mitigation measures are required. No further analysis of this topic in 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. Moreover, the Project Site is not located in a landslide area as mapped by the State or by the City. Upon buildout of the Project, the existing topography of the Project Site would not be substantially altered. Specifically, the Project Site

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[42] State of California, California Geological Survey, Earthquake Zones of Required Investigation, Hollywood Quadrangle, Seismic Hazard Zones, March 25, 1999.

[43] City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for 130 W. College Street, January 15, 2024.

would remain relatively flat and would not cause landslides. As such, no impacts related to landslides would occur, and no mitigation measures related to landslides are required.

Liquefaction-related effects include lateral spreading. As discussed above, while the Project Site is located in an identified liquefiable area, with adherence to applicable seismic design standards and current building codes, impacts related to liquefaction would be less than significant, and no mitigation measures are required.

Collapsible soils, or soils susceptible to hydroconsolidation, are geologically young, unconsolidated, low-density, loose, dry soils commonly present in arid to semi-arid regions, such as Southern California. Based on the Project Site geology and the results of the subsurface investigation included in the Geotechnical Investigation, soils potentially susceptible to collapse are not present at the Project Site and impacts would be less than significant.

Ground surface subsidence generally results from the extraction of fluids or gas from the subsurface that can result in the gradual lowering of the overlying ground surface. Subsidence can also occur when subsurface peat deposits oxidize and undergo volume loss. As there are no known ongoing extractions of oil or water that would lead to subsidence at the Project Site, and the subsurface soils are not known to contain significant quantities of peat, the potential for subsidence at the Project Site is low. Impacts would be less than significant, and no mitigations 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 Impact. Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. As noted in the Geotechnical Investigation, the soils at or near the Project's foundation level are predominantly granular (non-plastic), and therefore, the potential for expansive soils to be present at the Project Site is very low. In addition, Project design and construction would comply with all applicable requirements of LADBS as well as site-specific design recommendations set forth in the Geotechnical Investigation. Therefore, with adherence to existing regulations and site-specific design recommendations, impacts related to expansive soils would be less than significant, and no mitigation measures are required. 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 waste water 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.[44] 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

[44] Langan Engineering and Environmental Services, Inc., Utility Report for 130 W College Street, April 14, 2023. Refer to Appendix IS-4 of this Initial Study.

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?

Potentially 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. Although the Project Site has been subject to previous ground disturbance, the Project would require grading, excavation, trenching within the public right-of-way for utility connections, and other construction activities that could have the potential to disturb existing but undiscovered paleontological resources. Therefore, the EIR will provide further analysis of the Project's potential impacts to paleontological resources.

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 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 has undertaken initiatives designed to address the effects of greenhouse gas emissions, and to establish targets and emission reduction strategies for greenhouse gas emissions in California. Nevertheless, activities associated with the Project, including construction and operational activities, could result in greenhouse gas emissions that may have a significant impact on the environment. Therefore, the EIR will provide further analysis of the Project's greenhouse gas emissions.

b. 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 greenhouse gases, 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 greenhouse gases (e.g., Assembly Bill [AB] 32, SCAG RTP/SCS).

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?	☐	☐	☐	☒

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. The Project would not involve the routine transport of hazardous materials to and from the Project Site. During demolition, excavation, on-site grading, and building construction, hazardous materials such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners could be routinely used on the Project Site through the duration of construction. 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. As such, construction of the Project would not involve the routine disposal of hazardous materials. Notwithstanding, 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, there are regulations aimed at establishing specific guidelines regarding risk planning and accident prevention, protection from exposure to specific chemicals, and the proper storage of hazardous materials. The Project would be in full compliance with all applicable federal, State, and local requirements concerning the use, storage, and management of hazardous materials, including, but not limited to the Resource Conservation and Recovery Act, California Hazardous Waste Control Law, Federal and State Occupational Safety and Health Acts, SCAQMD rules, and permits and associated conditions issued by LADBS. Such requirements include obtaining material safety data sheets from chemical manufacturers, making these data sheets available to employees, labeling chemical containers in the workplace, developing and maintaining a written hazard communication program, and developing and implementing programs to train employees about hazardous materials. Consequently, Project construction activities would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

Operation of the Project would involve the routine use of small quantities of potentially hazardous materials typical of those used in commercial office, restaurant, and uses, including cleaning products, paints, and those used for maintenance of landscaping. Such use would be consistent with that currently occurring on the Project Site and other nearby developments. As a commercial office, restaurant, and retail development, the Project would not involve the routine transport, use, and disposal of large quantities of hazardous materials. The Project's limited use of common hazardous materials can typically be disposed of at Class II or III landfills, which accept most common waste materials, such as those identified above. In addition, all hazardous materials used on the Project Site during operation (if any) would be used, stored, and disposed of in accordance with all applicable federal, state, and local requirements.

Based on the above, with compliance with all applicable local, State, and federal laws and regulations relating to environmental protection and the management of hazardous materials, the Project's impact associated with the routine transport, use, or disposal of hazardous materials during construction and 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?

Potentially Significant Impact. While operation of the Project is not expected to involve hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste, construction would require demolition of the existing parking lot and excavation activities. The Project is also

located within a City-designated methane hazard zone. Therefore, further evaluation of this topic will be included in the EIR.

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?

Potentially Significant Impact. There is two existing schools within 0.25 miles of the Project Site. Castelar Elementary School and Ann Street Elementary School are located approximately 0.2 and 0.23 miles northwest of the Project Site, respectively. While the Project is not expected to involve hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste, further evaluation of this topic will be included in the EIR due to the proximity of the school.

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?

Potentially Significant Impact. The Project Site is currently developed with surface parking and has the potential to be included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. In addition, properties in the surrounding area also have the potential to be listed on various environmental databases. Therefore, further evaluation of this issue will be included in the EIR.

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

No Impact. The Project Site is not located within an airport land use plan or within 2 miles of a public airport or public use airport. The nearest airport is the Hollywood-Burbank Airport located approximately 10 miles northwest of the Project Site. Therefore, 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 impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. The nearest emergency/disaster route to the Project Site is Alameda Street adjacent to the Project Site to the west.[45] While the majority of construction activities for the Project would be confined to the Project Site, the Project would include trenching within the public right-of-way for utility connections, 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 traffic 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 Los Angeles Fire Department (LAFD) access requirements and applicable LAFD regulations regarding

[45] City of Los Angeles, Geohub, Disaster Routes, https://geohub.lacity.org/datasets/lacounty::disaster-routes-1/explore?location=34.062986%2C-118.234620%2C18.63, accessed June 14, 2023.

safety. Therefore, 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. As such, the Project's impact related to the implementation of the City's emergency response plan would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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 of the City and there are no wildlands located on or in the vicinity of the Project Site. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone.[46,47] In addition, the Project Site is not located within Fire District No. 1, which consists of areas identified by the City that are required to meet additional development regulations to reduce fire hazard-related risks.[48] Accordingly, the Project would not expose people or structures to a risk of loss, injury, or death involving wildland fires. Furthermore, the Project would be developed in accordance with LAMC requirements pertaining to fire safety, specifically LAMC Section 57.118 establishes LAFD's fire/life safety plan review and safety inspection for new construction projects; and LAMC Section 57.507.3.1 establishes fire water flow standards. Therefore, no impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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?	☐	☐	☒	☐

[46] City of Los Angeles, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for 130 W. College Street, January 15, 2024.

[47] Los Angeles Safety Element of the General Plan, General Plan Land Use in Very High Fire Hazard Severity Zones, p. 27.

[48] City of Los Angeles, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for 130 W. College Street, January 15, 2024.

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

The analysis of hydrology and water quality below is based, in part, on the Hydrology & Water Resources Technical Report (Water Resources Report) prepared for the Project by Langan Engineering and Environmental Services, Inc., dated January 2024, and included as Appendix IS-3 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 discussed below, 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

Construction activities such as earth moving, maintenance/operation of construction equipment, and handling/storage/disposal of materials could contribute to pollutant loading in stormwater runoff. However, because the Project Site is greater than 1 acre, the Project would be required to obtain

coverage under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit (i.e., Order 2012-0006-DWQ). In accordance with the requirements of the permit, the Applicant would prepare and implement a site-specific stormwater pollution prevention plan (SWPPP) adhering to the California Stormwater Quality Association BMP Handbook. The SWPPP would specify Best Management Practices (BMPs) to be used during construction. BMPs would include, but would not necessarily be limited to: erosion control, sediment control, non-stormwater management, and materials management BMPs.

With the implementation of an erosion control plan, site-specific BMPs would reduce or eliminate the discharge of potential pollutants from stormwater runoff. In addition, the Applicant would be required to comply with City grading permit regulations, which require implementation of necessary measures, plans (including a wet weather erosion control plan if construction occurs during the rainy season), and inspection to reduce sedimentation and erosion. Therefore, with compliance with NPDES requirements and City grading regulations, construction of the Project would not result in discharge that would cause: (1) pollution which would alter the quality of the water of the State to a degree which unreasonably affects beneficial uses of the waters; (2) contamination of the quality of the water of the State by waste to a degree which creates a hazard to the public health through poisoning or through the spread of diseases; or (3) nuisance that would be injurious to health; affect an entire community or neighborhood, or any considerable number of persons; and occurs during or as a result of the treatment or disposal of wastes. Furthermore, for the same reasons, construction of the Project would not result in discharges that would cause regulatory standards to be violated in Los Angeles River. Based on the above, with compliance with these existing regulatory requirements that include specific BMPs to address surface water quality, impacts during construction would be less than significant.

Operation

As expected for most urban developments, operation of the Project has the potential to introduce pollutants into the stormwater system. Anticipated and potential pollutants generated by the Project include sediment, nutrients, pesticides, metals, oil, and grease. However, in accordance with the LID Manual, the Project will implement multiple pre-treatment facilities and will capture runoff for reuse in supplementing the Project's irrigation demand.

With implementation of the treatment facilities prescribed by the LID Manual, operation of the Project would not result in discharges that would cause: (1) pollution which would alter the quality of the waters of the State (i.e., Los Angeles River) to a degree which unreasonably affects beneficial uses of the waters; (2) contamination of the quality of the waters of the State by waste to a degree which creates a hazard to the public health through poisoning or through the spread of diseases; or (3) nuisance that would be injurious to health; affect an entire community or neighborhood, or any considerable number of persons; and occurs during or as a result of the treatment or disposal of wastes. The pollutants listed above would be addressed through the implementation of approved LID BMPs.

Furthermore, a portion of the Project Site will be allocated to stormwater control, in compliance with LID BMP requirements, to control and treat stormwater runoff to the 85th percentile storm event. The installed BMP systems will be designed with an internal bypass overflow system to prevent upstream flooding during major storm events. As the Project Site currently does not have structural BMPs for the treatment of stormwater runoff from the existing impervious surfaces, implementation of the

proposed BMPs would result in an improvement in surface water quality runoff from the entire Project Site. As such, operation of the Project would not result in discharges that would cause regulatory standards to be violated.

Therefore, with implementation of the BMPs described above that would be implemented in accordance with regulatory requirements, operational impacts on surface water quality would be less than significant.

Groundwater Quality

Construction

As discussed in the Hydrology and Water Resources Technical Report included as Appendix IS-3 of this Initial Study, while groundwater was observed at 24 to 27 feet below ground surface, historic high groundwater depth is reported to be 20 feet below surface. Construction activities for the Project would include excavations up to approximately 17 feet for the subterranean parking level which will be the lowest depth of excavation, as well as grading for building structures, foundations, hardscape and landscape around the structures, and trenching within the public right-of-way for utility connections. As such, although unlikely based on groundwater depth, temporary dewatering during construction may be required. The temporary system would comply with all relevant NPDES requirements related to construction and discharges from dewatering operations.

In the event any contaminated soils are found during construction, these soils would be captured within that volume of excavated material removed from the Project Site, and would be remediated at an approved disposal facility in accordance with Los Angeles Department of Building and Safety Information Bulletin for Procedures When Hazardous and Contaminated Materials are Encountered During Construction or Geotechnical/Geological Exploration (Document No. P/BC 2020-131). Agencies that may be involved in this process include, but are not limited to, LAFD, California Geologic Energy Management Division, the Los Angeles Regional Water Quality Control Board (LARWQCB), Los Angeles County Fire Department Health Hazardous Materials Division, SCAQMD, and the Department of Toxic Substances Control.

During on-site grading and building construction, hazardous materials, such as fuels, 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 opportunity for hazardous materials releases 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 that could affect existing contaminants, expand the area or increase the level of groundwater contamination, or cause a violation of regulatory water quality standards at an existing production well. Additionally, any contaminated soils found would be captured within that volume of excavated material, removed from the Project Site, and remediated at an approved disposal facility in accordance with LADBS Information Bulletin for Procedures When Hazardous and Contaminated Materials are Encountered During Construction or Geotechnical/Geological Exploration (Document No. P/BC 2020-131). Furthermore, there are no groundwater production wells or public water supply wells located near the Project Site. In addition, construction of the Project would not involve drilling to or through a clean or contaminated aquifer. Due to compliance with measures as listed above and the implementation of

BMPs, construction activities would not be anticipated to affect existing wells. Therefore, the Project would not result in any substantial increase in groundwater contamination through hazardous materials releases and impacts on groundwater quality would be less than significant.

Operation

The Project does not include the installation of water wells, or any extraction or recharge system that is in the vicinity of the coast, an area of known groundwater contamination or seawater intrusion, a municipal supply well or spreading ground facility.

Operational activities which could affect groundwater quality include hazardous material spills and leaking underground storage tanks. No underground storage tanks are known to be currently operated or will be operated by the Project. Therefore, operation of the Project would not include the use or storage of hazardous materials beyond those typically associated with commercial uses such as cleaning products, paints, and maintenance of landscaping. Compliance with all applicable existing regulations at the Project Site regarding the handling and potentially required cleanup of hazardous materials would prevent the Project from affecting or expanding any potential areas of contamination, increasing the level of contamination, or causing regulatory water 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. In addition, operation of the Project would not involve drilling to or through a clean or contaminated aquifer. Therefore, the Project's potential impact on groundwater recharge is less than significant.

Conclusion

As discussed above, neither construction or operation of the Project would violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. Impacts would be less than significant, and no mitigation measures are required. No further analysis 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. As discussed in the following analysis, the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin.

Construction

As described in Section 3, Project Description, of this Initial Study, construction activities for the Project would include demolition of existing hardscape areas, excavating down to a maximum depth of 17 feet below grade to build up the underground parking level, building up the structures, and constructing hardscape and landscape around the structures. As noted in the Hydrology Report, while groundwater was observed at 24 to 27 feet below ground surface, historic high groundwater depth is reported to be 20 feet below surface. As such, although unlikely based on groundwater depth, temporary dewatering during construction may be required. The temporary system would

comply with all relevant NPDES requirements related to construction and discharges from dewatering operations. Due to the limited and temporary nature of these dewatering operations, regional impacts to groundwater flow and level would not be significant. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

Operation

The percolation of precipitation that falls on pervious surfaces is variable dependent upon the soil type, condition of the soil, vegetative cover, and other factors. The implementation of the Project would include the addition of pervious surfaces throughout the Project Site boundary. Specifically, the Project Site is entirely impervious under existing conditions and would be 85 percent impervious with the Project. However, as the Project is located in a highly urbanized area, any change in groundwater recharge due to the overall net change in impervious area would be minimal in the context of the regional groundwater basin. Furthermore, as discussed above, the Project would include the installation of a Standard Urban Storm Water Mitigation Plan (SUSMP) and LID BMPs. The installed BMP systems will be designed with an internal bypass or overflow system to prevent upstream flooding due to large storm events. The stormwater that bypasses the BMP systems would discharge to an approved discharge point in the public right-of-way and not result in infiltration of a large amount of rainfall, which would affect groundwater hydrology, including the direction of groundwater flow. Impacts 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. Although no streams or rivers cross the Project Site, construction activities for the Project would include excavation up to 17 feet for the subterranean parking level, as well as grading for building structures, foundations, and hardscape and landscape around the structures. It is estimated that approximately 66,234 cubic yards of export would be hauled from the Project Site. These activities have potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. Also, exposed and stockpiled soils could be subject to erosion and conveyance into nearby storm drains during storm events. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. However, as discussed throughout this Checklist Question No. X, Hydrology and Water Quality, the Project would be required to comply with all applicable City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion. In addition, as discussed in Response to Checklist Questions No. X.b above, the Project Site is entirely impervious under existing conditions and would be 85 percent impervious with the Project. Accordingly, similar to existing conditions, there would be a limited potential for erosion or siltation to occur from the exposed soils or large expanses of impervious areas. Therefore, the Project would not result in substantial erosion or siltation 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.

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. The Project Site is developed with a surface parking lot and is entirely impervious under existing conditions. Development of the Project would include development of a new building and landscaped areas that would drain to the proposed stormwater treatment system. Upon completion, the amount of impervious surfaces would decrease from 100 percent to approximately 85 percent. In addition, the Project would implement a capture and use system to comply with LID requirements. Specifically, based on the requirements in Section 3.1.3 of the City's LID Manual, the Project is required to provide at least equivalent of 8 percent of the Project Site and landscaping for biofiltration plants for treating the runoff water. Therefore, the Project would not substantially increase the rate or amount of surface runoff in a manner which would result in 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. Refer to Response to Checklist Questions No. X.a and No. X.c.ii, above. As discussed in Response to Checklist Question No. X.a, the Project would implement capture and use systems to collect and store the first flush of stormwater runoff to satisfy LID requirements and use it for irrigation. Based on the proposed landscape area and irrigation demands, a capture and reuse system is feasible for the Project Site. The capture and use system will be designed to comply with the most current LID standards. Compliance with the LID requirements for the Project Site would ensure stormwater treatment through the implementation of post-construction BMPs, which are required to control pollutants associated with storm events up to the 85th percentile storm event, per the City's Stormwater Program. As the Project Site currently does not have structural BMPs for the treatment of stormwater runoff from the existing impervious surfaces, implementation of the proposed BMPs would result in an improvement in surface water quality runoff from the entire Project Site. In addition, as discussed in Response to Checklist Question No. X.c.ii, upon completion of the Project, the Project Site is entirely impervious under existing conditions and would be 85 percent impervious post-construction. Furthermore, as detailed in the Water Resources Report, stormwater flows would decrease slightly from 7.24 cubic feet per second under existing conditions to 7.10 cubic feet per second with implementation of the Project. As such, the Project would not cause flooding during a 50-year storm event or result in an adverse change to the movement of surface water. Additionally, the Project will not increase concentrations of the items listed as constituents of concern for the Los Angeles River Watershed because it will capture and convey the runoff to two pre-treatment devices and storage tanks for reuse on the Project Site. Therefore, the Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

iv. impede or redirect flood flows?

No Impact. 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.[49,50] Thus, the Project would not impede or redirect flood flows. No impacts would occur, and no mitigation measures would be required. No further analysis 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?

Less Than Significant Impact. As discussed above, the Project Site is not located within a 100-year flood hazard area as mapped by FEMA or by the City. In addition, the Project Site is located approximately 15 miles northeast of the Pacific Ocean. Therefore, no tsunami or tsunami events would be expected to impact the Project Site. Furthermore, there are no standing bodies of water near the Project Site that may experience a seiche and according to the California Department of Water Resources, the Project Site is not located within a dam inundation area.[51]

Additionally, as discussed above, the Project would include new structural BMPs throughout the Project Site which would reduce the amount of pollutants entering the stormwater system and groundwater in the unlikely event of inundation of the Project Site. Impacts would be less than significant, 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. As discussed above, Project construction could result in erosion of exposed and stockpiled soils, increased pollutant loading due to on-site watering activities, and pollutant discharges relating to the storage, handling, use and disposal of chemicals, adhesives, coatings, lubricants, and fuel. However, the Project would be required to comply with all applicable City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion. BMPs to be used during construction would include, but would not necessarily be limited to, erosion control, sediment control, non-stormwater management, and materials management BMPs. These BMPs will be included in the SWPPP which would be included as part of the construction documents and is utilized to minimize pollutant discharge during construction. With the implementation of site-specific BMPs included as part of the required erosion control plan, the Project would reduce or eliminate the discharge of potential pollutants from the stormwater runoff. In addition, the Applicant would be required to comply with City grading permit regulations, which require implementation of necessary measures, plans (including a wet weather erosion control plan if construction occurs during the rainy season), and inspection to reduce sedimentation and erosion. With compliance with these existing regulatory requirements that include

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49 Federal Emergency Management Agency, Flood Insurance Rate Map 06037C1628F, September 26, 2008.

50 City of Los Angeles, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for 130 W. College Street, January 15, 2024.

51 Department of Water Resources, Dam Breach Inundation Map Web Publisher, https://fmds.water.ca.gov/webgis/?appid=dam_prototype_v2, accessed June 14, 2023.

specific BMPs to address surface water quality, impacts during construction would be less than significant.

Potential pollutants generated by the Project during operation would include sediment, nutrients, pesticides, trash and debris, oil and grease, and metals typical of urban developments. However, the implementation of BMPs required by the City's LID Ordinance would reduce the amount of these pollutants entering the stormwater. Additionally, since the existing Project Site does not have any structural or LID BMPs to treat or infiltrate stormwater, implementation of the LID features proposed as part of the Project would result in an improvement in surface water quality runoff as compared to existing conditions. As such, the Project would not introduce new pollutants or an increase in pollutants that could conflict with or obstruct any water quality control plans.

With respect to groundwater, as discussed above in Checklist Question No. X.b, the Project would not result in impacts related to groundwater recharge or interfere with sustainable groundwater management of the basin.

Therefore, 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 would be 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 discussed in Section 3, Project Description, of this Initial Study, the Project Site is currently developed with asphalt surface parking, a billboard, parking lights, cargo storage container, six electric bus chargers, and fencing. The Project would replace the existing surface parking with a new commercial building comprised of office, restaurant, and retail uses. These uses would be consistent with the adjacent uses in the community. In addition, access to the adjacent streets and properties would be maintained throughout construction and operation. Furthermore, the Project does not propose a freeway or other large infrastructure that would divide the existing surrounding community. Therefore, the Project would not physically divide an established community. Impacts related to the physical division of an established community would be less than

significant, and no mitigation measures 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 requires several discretionary approvals. While the Project would not be anticipated to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, the EIR will provide further analysis of the Project's potential to conflict with applicable land use plans, policies, and 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. The Project Site is located within an urbanized area and no mineral extraction operations currently occur on the Project Site. In addition, the Project Site is not located within a mineral producing area as classified by CGS.[52] The Project Site is also not located within a City-designated oil field or oil drilling area.[53] As such, the potential for mineral resources to occur on-site is low. Therefore, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site, and, as such, no impact would occur. No further analysis of this topic in the EIR is required.

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[52] California Geological Survey, Aggregate Sustainability in California, Fifty-Year Aggregate Demand Compared to Permitted Aggregate Reserves, 2018.

[53] City of Los Angeles Department of Public Works, Bureau of Engineering, NavigateLA, Parcel Profile Report, www.ladbsservices2.lacity.org/OnlineServices/PermitReport/ParcelProfileDetail2?pin=135A215-285, accessed June 14, 2023.

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. No mineral extraction operations currently occur on the Project Site. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present, or within a mineral producing area as classified by CGS. The Project Site is also not located within a City designated oil field or oil drilling area. Therefore, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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. Noise sensitive uses near the Project Site include residential uses to the west and a proposed mixed-use development to the north. 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 including, but not limited to, the parking garage and mechanical equipment 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. 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, including an analysis of potential impacts to the historic Granite Block Paving near the Project Site.

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?

Less Than Significant Impact. The Project Site is not located within the vicinity of a private airstrip or within 2 miles of a public airport or public use airport. The nearest airport is the Hollywood-Burbank Airport located approximately 10 miles northwest of the Project Site. Therefore, the Project would not expose people residing or working in the Project area to excessive airport noise. Impacts would be less than significant, and no further evaluation of this topic in an EIR 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. The Project would include the construction of new office, restaurant, and retail uses. Since the Project does not propose a housing component, it would not directly induce a new residential population which would contribute to population growth in the vicinity of the Project Site or the Central City North Community Plan area.

While construction of the Project would create temporary construction-related jobs, the work requirements of most construction projects are highly specialized such 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 which could induce substantial population growth.

As discussed in Section, 3, Project Description, of this Initial Study, the Project would include the development of 234,601 square feet of new uses within the Project Site consisting of 224,597 square feet of office uses, 5,894 square feet of restaurant uses, and 4,110 square feet of retail uses. Based on employee generation factors from LADOT, the Project is estimated to generate an increase of 930 new employees on the Project Site.[54] Using employment data from the 2020–2045 RTP/SCS, an estimated 1,967,307 employees are projected within the City of Los Angeles in 2028, the Project's buildout year, with 49,586 new employees between 2024 and 2028. The Project's net increase in employees would represent 0.04 percent of the total number of employees in 2028 and 1.88 percent of the growth between 2024 and 2028. As noted above, the Project would not introduce new residential uses at the Project Site and would therefore not result in a direct population growth in the area, and the number of jobs would be consistent with both SCAG's 2020–2045 RTP/SCS. While some of the new employment positions could be filled by persons who would relocate to the vicinity of the Project Site, this potential increase in population would not be substantial since not all employees would move close to the Project Site. Specifically, some employment opportunities may be filled by people already residing in the vicinity of the Project Site and other persons would commute to the Project Site from other communities in and outside of the City. Therefore, given that the Project would not directly contribute to substantial population growth in the Project area through the development of residential uses and as some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site or who would commute to the Project Site, the potential growth associated with Project employees who may relocate their place of residence would not be substantial. Furthermore, as the Project would be located in a highly developed area with an established network of roads and other urban infrastructure, the Project would not require the extension of such infrastructure in a manner that would indirectly induce substantial population growth. 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. The Project Site is currently occupied by an asphalt surface parking lot, a billboard, parking lights, cargo storage container, six electric bus chargers, and fencing. No housing currently exists on the Project Site and the Project would not displace any existing people or housing. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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[54] Los Angeles Department of Transportation (LADOT) and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020.

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?

Less Than Significant Impact. The Project Site and the surrounding area are currently served by LAFD Fire Station 4, located at 450 E. Temple Street (approximately 1.1 miles south of the Project Site). Additional stations within 2 miles of the Project Site are Fire Station 1 located at 2230 Pasadena Avenue (approximately 1.5 miles northeast of the Project Site), Fire Station 2 located at 1962 Cesar E. Chavez Avenue (approximately 1.7 miles southeast of the Project Site, Fire Station 3 located at (approximately 1.4 miles southwest of the Project Site), and Fire Station 9 located at 430 7th Street (approximately 2 miles southwest of the Project Site.[55] Based on the response distance from existing fire stations, LAFD considers fire protection to be adequate.[56]

Project construction could potentially impact the provision of LAFD services in the vicinity of the Project Site as a result of construction impacts to the surrounding roadways. While the majority of construction activities would be contained within the boundaries of the Project Site, access to the Project Site and the surrounding vicinity could be impacted by temporary lane closures, roadway/access improvements, and the trenching associated with utility line connections. Construction activities would also generate traffic associated with the movement of construction

[55] LAFD, Find Your Station, www.lafd.org/fire-stations/station-results, accessed December 1, 2023.

[56] Written correspondence from Kristin Crowley, Fire Chief, Los Angeles Fire Department, April 23, 2024. See Appendix IS-4 of this Initial Study.

equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic. Thus, although construction activities would be short-term and temporary for the area, Project construction activities could temporarily increase response times along adjacent streets due to travel time delays caused by traffic during the Project's construction phase. However, construction-related traffic, including hauling activities and construction worker trips, would occur outside the typical weekday commuter morning and afternoon peak periods, thereby reducing the potential for traffic-related conflicts. In addition, a construction traffic management plan would be implemented during Project construction to ensure that adequate and safe access remains available within and near the Project Site during construction activities. The Project would also employ temporary traffic controls, such as flag persons, to control traffic movement during temporary traffic flow disruptions. Traffic management personnel would be trained to assist in emergency response by restricting or controlling the movement of traffic that could interfere with emergency vehicle access. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way. Furthermore, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Since emergency access to the Project Site would remain unobstructed during construction of the Project, impacts related to LAFD emergency access would be less than significant.

As previously discussed, the Project would include the development of 234,601 square feet of new uses within the Project Site consisting of 224,597 square feet of office uses, 5,894 square feet of restaurant uses, and 4,110 square feet of retail uses. Based on employee generation factors from LADOT, the Project is estimated to generate an increase of 930 new employees on the Project Site.[57] As the Project would increase the building area and daytime population of the Project Site compared to existing conditions, the Project would increase the demand for LAFD fire protection services. However, the proposed uses would be similar to existing uses within and immediately adjacent to the Project Site and would be expected to generate a range of fire service calls similar to what occurs under existing conditions. The Project would not include any unique or especially hazardous uses, such as industrial facilities, that use or generate large quantities of hazardous and/or toxic materials that could pose an extreme risk of serious accident or fire at the Project Site. The types of fires that could potentially occur within the Project Site and typically associated with office, restaurant, and retail uses would be adequately suppressed with the fire equipment found at the fire stations nearest the Project Site. Additionally, the Project would implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc., including as required by LAFD. Compliance with applicable City Building Code and Fire Code requirements would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, and which are required prior to the issuance of a building permit.

Compliance with applicable regulatory requirements, including LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, would ensure that adequate fire prevention features would be provided that would reduce the demand on LAFD facilities and

[57] Los Angeles Department of Transportation (LADOT) and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020.

equipment resulting from the Project. As such, compliance with Fire Code requirements would minimize the potential for incidents requiring an emergency response by LAFD and therefore reduce the need for a new fire station, or the expansion, consolidation, or relocation of an existing fire station.

Vehicular access to the Project Site, including access for emergency vehicles, provided through two driveways which would be located along West College Street and conform to LADOT standards. Project-related traffic would have the potential to increase emergency vehicle response times to the Project Site and surrounding properties due to travel time delays caused by traffic. However, the area surrounding the Project Site includes an established street system, consisting of freeways, primary and secondary arterials, and collector and local streets, which provide regional, sub-regional, and local access and circulation within the Project vicinity. The Project Site is located within an urbanized area of the City and is surrounded by an existing network of streets. While sidewalks, curbs, and gutters do not currently meet City standards, these will be upgraded as part of Project construction. Therefore, the street system surrounding the Project Site would not be considered substandard. In addition, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, the increase in traffic generated by the Project would not significantly impact emergency vehicle access to the Project Site and surrounding area. Furthermore, the Project's driveways and internal circulation would be designed to incorporate all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, and which are required prior to the issuance of a building permit. The Project also would not include the installation of barriers that could impede emergency vehicle access. Lastly, the passenger drop-off area would provide a designated area for vehicles to drop-off passengers and not impede traffic. As such, emergency access to the Project Site and surrounding uses would be maintained and Project-related traffic is not anticipated to impair the LAFD from responding to emergencies at the Project Site or the surrounding area.

Based on the above, the Project operation would not require the addition of a new fire station or the expansion of an existing facility in order to maintain service. Therefore, operation of the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities (fire protection), the construction of which would cause significant environmental impacts, in order to maintain acceptable fire protection services. Project impacts would be less than significant, and no mitigation measures are required. No further analysis of this issue in an EIR is required.

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?

Less Than Significant Impact. The Project Site and the surrounding area are currently served by the Los Angeles Police Department's (LAPD) Central Bureau and the Central Community Police Station, located at 251 E. 6th Street (approximately 1.5 miles southwest of the Project Site).[58]

Project construction could potentially impact the provision of LAPD services in the vicinity of the Project Site as a result of construction impacts to the surrounding roadways. While the majority of construction activities would be contained within the boundaries of the Project Site, access to the Project Site and the surrounding vicinity could be impacted by temporary lane closures, roadway/access improvements, and trenching associated with utility line connections. Construction activities would also generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic. Thus, although construction activities would be short-term and temporary for the area, Project construction activities could temporarily increase response times along adjacent streets due to travel time delays caused by traffic during the Project's construction phase. However, construction-related traffic, including hauling activities and construction worker trips, would occur outside the typical weekday commuter morning and afternoon peak periods, thereby reducing the potential for traffic-related conflicts. In addition, a construction traffic management plan would be implemented during Project construction to ensure that adequate and safe access remains available within and near the Project Site during construction activities. The Project would also employ temporary traffic controls, such as flag persons, to control traffic movement during temporary traffic flow disruptions. Traffic management personnel would be trained to assist in emergency response by restricting or controlling the movement of traffic that could interfere with emergency vehicle access. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way. Furthermore, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Since emergency access to the Project Site would remain unobstructed during construction of the Project, impacts related to LAPD emergency access would be less than significant.

As previously noted, the Project does not include the development of residential uses. Therefore, the Project would not directly affect the existing officer-to-resident ratio within LAPD's Central Bureau. However, the Project would introduce a new employee and visitor population to the Project Site, which could result in an indirect demand for police services. These employment opportunities would include a range of full-time and part-time positions, which may be filled, in part, by employees already residing in the vicinity of the Project Site and who are already included in the residential population of the LAPD's Central Bureau. Other positions may be filled by persons who would commute and who would not relocate their place of residence as a result of working at the Project Site. Overall, given the LAPD's metrics for evaluating service capacity based on residential population, the Project's increase in the police service population would not affect the officer-to-resident ratio for LAPD's Central Bureau and the officer-to-resident ratio would remain at its current level.

However, the Project would incorporate security features to reduce the demand for police protection services. These features would include sufficient lighting throughout the Project Site to ensure safety

[58] LAPD, Your LAPD By Division, Central Community Police Station, www.lapdonline.org/lapd-contact/central-bureau/central-community-police-station/, accessed December 1, 2023.

and visibility and well illuminated entryways, walkways, and parking areas to eliminate areas of concealment. Additionally, as recommended by LAPD, prior to the issuance of a building permit, the Applicant would submit the Project plans to LAPD for review regarding the incorporation of feasible crime prevention features as well as access routes and other information that might facilitate police response. In addition to the implementation of these design features, which would help offset the Project-related increase in demand for police services, the Project would generate revenues to the City's General Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new police facilities and related staffing in the community, as deemed appropriate.

Overall, the Project would not generate a demand for additional police protection services that would exceed the LAPD's capacity to serve the Project Site. In its April 30, 2024 letter included as Appendix IS-5 of this Initial Study, LAPD stated that there are no planned improvements to the Central Community Police Station and concluded that the Project "…individually or combined with other past or present projects, will not result in the need for new or altered police facilities."[59]

Therefore, Project operation would not necessitate the provision of new or physically altered government facilities, the construction of which would cause significant environmental impacts, in order to maintain LAPD's capability to serve the Project Site. Impacts to police protection services would be less than significant, and no mitigation measures are required. No further analysis of this issue in an EIR is required.

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). LAUSD is divided into six local districts.[60] The Project Site is located in Local District–East.[61] As previously discussed, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in a direct increase in the number of students within the service area of LAUSD from the introduction of a residential population. In addition, not all new employees of the Project would relocate to the vicinity of the Project Site, which could otherwise trigger a demand for new or expanded school facilities. Furthermore, even if there were new school facilities that would need to be built, pursuant to Government Code Section 65995, the Applicant would be required to pay development fees for schools to LAUSD prior to the issuance of building permits. Pursuant to Government Code Section 65995, the payment of these fees is considered mitigation of Project-related school impacts. Therefore, impacts to schools would be less than significant, and no mitigation measures are required. No further analysis of this issue in an EIR is required.

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[59] Written correspondence from Dominic H. Choi, Los Angeles Police Department, April 30, 2024. See Appendix IS-4 of this Initial Study.

[60] Los Angeles Unified School District, Local District—East Map, July 29, 2022.

[61] Los Angeles Unified School District, Local District—East Map, July 29, 2022.

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. 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. There are 48 parks within a 2-mile radius of the Project Site, including six within 1 mile as shown in Table 2 on page 66: Alpine Recreation Center, Los Angeles Plaza Park, Buena Vista Meadow Picnic Area, Downey Recreation Center, City Hall Park Center, and Everett Triangle Park.[62]

As previously discussed, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in on-site residents who would utilize nearby parks and/or recreational facilities. Additionally, the new employment opportunities that would be generated by the Project may be filled, in part, by employees already residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities. Therefore, only a fraction of the new employees generated by the Project could create a demand for parks. While it is possible that some of these employees may utilize local parks and recreational facilities, such use would be anticipated to be limited due to work obligations and the amount of time it would take for employees to access off-site local parks. In addition, Project employees would be more likely to use parks near their homes during non-work hours. Furthermore, the Project proposes on-site amenities which would reduce the likelihood employees would use local parks. Specifically, as discussed in Section 3, Project Description, of this Initial Study, the Project would provide approximately 52,716 square feet of outdoor areas on-site with 33,776 square feet of hardscaping and 18,940 square feet of landscaping. Additionally, the Project proposes approximately 13,575 square feet of exterior space, of which 11,217 square feet is hardscape accessible to the public and 2,358 square feet of landscaping within the public-right-of-way at the sidewalk areas adjacent to the Project Site. In total, the Project would provide approximately 28,126 square feet of publicly accessible hardscape and landscape area on-site and off-site. Outdoor amenities within the Project would include a publicly accessible street plaza and garden which would both be located on the ground floor. The street plaza would be located on the corner of North Alameda Street and West College Street. The street plaza would include an entrance to the Project, outdoor seating, a raised planter, and bicycle parking. The garden would be located near the entrance of the Project along Bruno Street with egress stairs, raised planters, and architectural screening. Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered parks or the need for new or physically altered parks. Impacts would be less than significant, and no mitigation measures are required. No further analysis of the issue in an EIR is required.

[62] City of Los Angeles Department of Recreation and Parks, Facility Map Locator, www.laparks.org/facility-map-locator, accessed December 1, 2023.

Table 2
City of Los Angeles Parks and Recreational Facilities Within a 1-Mile Radius of the Project Site

No.	Facility and Address	Distance from Project Site[a] (miles)	Type of Park/ Recreational Facilities	Amenities
1	**Alpine Recreation Center** 817 Yale Street Los Angeles, CA 90012	0.28	Recreation Center	Auditorium, Sports Courts, Children's Play Area
2	**Los Angeles Plaza Park** 125 Paseo de la Plaza Los Angeles, CA 90012	0.46	Park	Grassy Area, Public Plaza
3	**Buena Vista Meadow Picnic Area** Meadow Road (East Side of Dodger Stadium) Los Angeles, CA 90012	0.73	Park	Barbecue Pits, Children's Play Area, Picnic Tables, Benches
4	**Downey Recreation Center** 6567 Selma Avenue Los Angeles, CA 90028	0.73	Recreation Center	Auditorium, Sports Courts/Fields, Picnic Tables, Indoor Gym, Stage
5	**City Hall Park Center** 200 N. Main Street Los Angeles, CA 90012	0.95	Park	Grassy Area, Public Plaza
6	**Everett Triangle Park** Everett Street One Block North of Sunset Echo Park, CA 90026	1.00	Park	Grassy Area

[a] *Distances are approximate aerial/bird's eye view distances from the Project Site obtained from the City of Los Angeles, Department of Recreation and Parks Facility Locator.*

Source: City of Los Angeles Department of Recreation and Parks, Facility Map Locator, www.laparks.org/facility-map-locator, accessed December 1, 2023.

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, eight regional branch libraries, and 64 neighborhood branch libraries, as well as through web-based resources.[63] The Project area is served by existing libraries within the Central City North Community Plan area, including the Chinatown Branch Library, located 0.3 miles southeast of the Project Site.

[63] Los Angeles Public Library, Los Angeles Public Library Strategic Plan 2015–2020.

As previously discussed, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in a direct increase in the number of residents within the service population of the Chinatown Branch Library. In addition, Project employees would have internet access to LAPL and other web-based resources, decreasing the demand on library facilities. Furthermore, Project employees would be more likely to use library facilities near their homes during non-work hours. Given that some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site, Project employees and the potential indirect population generation that could be attributable to those employees would generate minimal demand for library services. Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities or the need for new or physically altered library facilities. Impacts would be less than significant, and no mitigation measures are required. No further analysis of this issue in an EIR is required.

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. The Project does not propose the development of residential uses which would create a demand on nearby parks and/or recreational facilities. Additionally, the new employment opportunities that would be generated by the Project may be filled, in part, by employees already residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities. Therefore, only a fraction of the new employees generated by the Project could create a demand for parks and recreational facilities. While it is possible that some of these employees may utilize local parks and recreational facilities, such use would be anticipated to be limited due to work obligations and the amount of time it would take for employees to access off-site local parks and recreational facilities. The Project proposes on-site amenities that would reduce the likelihood employees would use local parks. Specifically, as discussed in Section 3, Project Description, of this Initial Study, the Project would provide approximately 52,716 square feet of outdoor areas on-site with 33,776 square feet of hardscaping and 18,940 square feet of landscaping. Additionally, the Project proposes approximately 13,575 square feet of exterior space, of which 11,217 square feet is

hardscape accessible to the public and 2,358 square feet of landscaping within the public-right-of-way at the sidewalk areas adjacent to the Project Site. In total, the Project would provide approximately 28,126 square feet of publicly accessible hardscape and landscape area on- and off-site. Outdoor amenities within the Project would include a publicly accessible street plaza and garden which would both be located on the ground floor. The street plaza would be located on the corner of North Alameda Street and West College Street. The street plaza would include an entrance to the Project, outdoor seating, a raised planter, and bicycle parking. The garden would be located near the entrance of the Project along Bruno Street with egress stairs, raised planters, and architectural screening. In addition, Project employees would be more likely to use parks near their homes during non-work hours. Therefore, 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. The impact on parks and recreational facilities would be less than significant, and mitigation measures would not be required. No further evaluation of this topic in an EIR is required.

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

No Impact. The Project does not include any residential uses and therefore would not result in any direct substantial population growth that would increase use of existing recreational facilities. Therefore, the Project would not necessitate construction of new recreational facilities. Therefore, no impact would occur, and no mitigation measures would be required. No further evaluation of this topic 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. Operation of the proposed uses would generate vehicle and transit trips throughout the day. The resulting increase in the use of the area's roadways could conflict with an applicable plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. Therefore, further analysis of this issue will be provided 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 *Transportation Assessment Guidelines* (TAG; July 2019), which defines the methodology for analyzing a project's transportation impacts in accordance with SB 743. The TAG was most recently updated in August 2022.

The Project would develop new commercial 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 TAG requires analysis of hazardous geometric design features or incompatible uses if a project proposes new driveways or includes any voluntary or required modifications to the public right-of-way. As discussed in Section 3, Project Description, of this Initial Study, access to the Project's parking garage and loading/trash areas would be provided via two driveways on College Street. A passenger drop-off and pick-up area would also be provided along Bruno Street, which is designed to preserve the Granite Block Paving (HCM #211) along Bruno Street consistent with City Planning policy. Overall, the number of curb cuts on the Project Site would be reduced by one with the elimination of one curb cut on West College Street which is currently used for access to the surface parking lot. The new driveways, passenger drop-off area, and curb cuts would conform to LADOT standards related to widths, distances from corners, and pedestrian safety.

Additionally, the roadways adjacent to the Project Site are part of the urban roadway network and contain no sharp curves or dangerous intersections. The Project Site is located in a highly urbanized area developed with roadways and infrastructure. All access and circulation associated with the Project would be designed and constructed in conformance with all applicable requirements established by LADBS, LAFD, and the LAMC. The Project would not include any new roads that

would result in an increase in hazards due to a design feature. Lastly, the Project would not result in incompatible uses as the proposed uses are consistent with the types of commercial uses already present in the surrounding area. Thus, impacts related to increased hazards due to a geometric design feature or incompatible use would be less than significant, and no further analysis of this topic in the EIR is required.

d. Would the project result in inadequate emergency access?

Less Than Significant Impact. As discussed above under Checklist Question No. IX, Hazards and Hazardous Materials, the nearest emergency/disaster route to the Project Site is Alameda Street adjacent to the Project Site to the west.[64] While the majority of construction activities for the Project would be confined to the Project Site, the Project includes off-site trenching within the public right-of-way for utility connections, 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 traffic 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. Therefore, the Project would not result in inadequate emergency access. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

XVIII. TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☒	☐	☐	☐

[64] City of Los Angeles, Geohub, Disaster Routes, https://geohub.lacity.org/datasets/lacounty::disaster-routes-1/explore?location=34.062986%2C-118.234620%2C18.63, accessed June 14, 2023.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 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). Approved by Governor Jerry Brown on September 25, 2014, AB 52 establishes 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 part of CEQA. As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation.

As noted above, the Project would require grading, excavation, trenching within the public right-of-way for utility connections, and other construction activities that could have the potential to disturb existing but undiscovered tribal cultural resources. Therefore, the potential exists for the Project to significantly impact a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe. In compliance with AB 52, the City notified all applicable tribes on April 10, 2024, and the City will participate in any requested consultations for the Project. 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?	☐	☐	☒	☐

The wastewater analysis below is based, in part, on the *Utility Technical Report for 130 W College Street* (Utility Report) prepared for the Project by Langan Engineering and Environmental Services, Inc., dated July 11, 2023, and included as Appendix IS-6 of this Initial Study.

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, Electric Power, and Natural Gas)/Less Than Significant Impact (Wastewater, Stormwater, and Telecommunications Facilities). Water, wastewater, electric power, and natural gas 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 on the Project Site and the potential corresponding increase in water, electricity, and natural gas demand, further analysis of this issue in an EIR will be provided.

Wastewater and telecommunications facilities are analyzed below. Stormwater is analyzed under Section X, Hydrology and Water Quality, above.

Wastewater

Wastewater generated by the Project would be conveyed via 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),[65] and current average wastewater flows are at approximately 275 mgd.[66] Accordingly, the remaining available capacity at the HWRP is approximately 175 mgd. As shown in Table 3 on page 74, the Project would generate a wastewater flow of approximately 31,135 gallons per day (gpd), or approximately 0.03 mgd. The Project's increase in average daily wastewater flow of 0.03 mgd would represent approximately 0.02 percent of the current estimated 175 mgd of remaining available capacity at the HWRP. Therefore, the Project-generated wastewater would be accommodated by the existing capacity of the HWRP. Furthermore, wastewater flows would be typical of office and commercial developments which are currently treated by HWRP. and no industrial discharge into the wastewater system would occur. Additionally, discharge of effluent from the HWRP into Santa Monica Bay is also regulated by permits issued under the NPDES and is required to meet LARWQCB requirements. As LA Sanitation (LASAN) monitors the treated wastewater, and because the wastewater generated by the Project would be similar to wastewater currently treated at HWRP, wastewater generated from the Project Site would not exceed wastewater treatment requirements of LARWQCB.

The Project is anticipated to utilize existing sewer infrastructure. As provided in the WWSI included as Appendix C of the Utility Report, in the vicinity of the Project Site, there is a 15-inch sewer line on N. Alameda Street, an 18-inch sewer line on Alameda Street, and a 30-inch sewer line on Los Angeles Street. The 15-inch line on Alameda Street has a design capacity of 1.16 mgd, the 18-inch line on Alameda Street has a design capacity of 2.36 mgd, and the 30-inch line on Los Angeles Street has a design capacity of 7.78 mgd. Current gauging was not available for the 15-inch line; however, the 18-inch line was at 25 percent capacity and the 30-inch line was at 17 percent capacity. LASAN has analyzed the Project's demands along with existing conditions and forecasted growth and has determined that there appears to be sufficient service to accommodate the total flows of the Project. As required by LAMC Section 64.15, the Project would submit a Sewer Capacity Availability Request to LASAN to evaluate the capability of the existing wastewater system and obtain approval to discharge the Project's wastewater to the existing sewer lines surrounding the Project Site. 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, the Project would not cause a measurable increase in wastewater flows at a point where, and at a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained.

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65 LASAN, Water Reclamation Plants, Hyperion Water Reclamation Plant, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=vm8qwyj80_4&_afrLoop=18606279438697733#!, accessed June 14, 2023.

66 LASAN, Water Reclamation Plants, Hyperion Water Reclamation Plant, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=vm8qwyj80_4&_afrLoop=18606279438697733#!, accessed June 14, 2023.

Table 3
Estimated Project Wastewater Generation

Land Use	Floor Area	Wastewater Generation Rate (gpd/unit)[a]	Wastewater Generation (gpd)
PROPOSED			
Office	224,597 sf	0.12 gpd/sf	26,952
Restaurant: Full-Service Indoor Seat (5,894 sf)	136 seats	30 gpd/seat	4,080
Retail	4,110 sf	0.025 gpd/sf	103
Proposed Wastewater Generation			**31,135**

sf = square feet

gpd = gallons per day

[a] *Wastewater generation rates are based on 2012 LASAN Sewer Generation Rates.*

Source: Langan Engineering and Environmental Services, 2023. Refer to Appendix IS-4 of this Initial Study.

Based on the above, the Project would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects. Therefore, impacts would be less than significant, and mitigation measures are not required. No further analysis of this topic in an EIR is required.

Stormwater

As discussed above in Response to Checklist Question No. X.c.iii, the Project would decrease stormwater flow rates. As such, the Project would not require or result in the relocation or construction of new or expanded stormwater drainage. Based on the above, the Project would not require or result in the construction of new stormwater treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects. Therefore, impacts would be less than significant, and mitigation measures are not required. No further analysis of this topic in an EIR is required.

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 further evaluation of this topic 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 the amount of developed floor area on the Project Site, the Project has the potential to result in increased 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 shown in Table 3 on page 74 of this Initial Study, the Project would generate a wastewater flow from the Project Site of approximately 31,135 gpd, or approximately 0.03 mgd. The Project's increase in average daily wastewater flow of 0.03 mgd would represent approximately 0.02 percent of the current 175 mgd of remaining available capacity of the HWRP.[67] Therefore, wastewater generated by the Project would be accommodated by the existing capacity of the HWRP.

Various factors, including future development of new treatment plants, upgrades and improvements to existing treatment capacity, development of new technologies, etc., will ultimately determine the available capacity of the Hyperion Service Area in 2028, the operational year of the Project. Planned upgrades would provide for improvements beyond 2040 to serve future population needs. However, it is conservatively assumed that no new improvements to the wastewater treatment plants would occur prior to 2028. Thus, based on this conservative assumption, the capacity of the HWRP in 2028 would continue to be 450 mgd.

Based on LASAN's average flow projections for the HWRP, it is anticipated that average flows in 2028, the Project build-out year, would be approximately 271.2 mgd.[68] Accordingly, the future remaining available capacity in 2028 would be approximately 178.8 mgd.[69] The Project's increase in average daily wastewater flow of 0.03 mgd would represent approximately 0.02 percent of the estimated future remaining available capacity of 178.8 mgd at the HWRP.[70] Therefore, wastewater generated under the Project would be accommodated by the future capacity of the HWRP.

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67 (0.03 mgd / 175 mgd) x 100 = 0.02%

68 Los Angeles Department of Water and Power, One Water LA 2040 Plan—Volume 2, Table ES.1, Projected Wastewater Flows. Based on a straight-line interpolation of the projected flows for the HWRP for 2020 (approximately 256 mgd) and 2030 (approximately 275 mgd). The 2028 value is extrapolated from 2020 and 2030 values: [(275 mgd – 256 mgd) ÷ 10) * 8] + 256 = ~ 271.2 mgd.

69 450 mgd – 271.2 mgd = 178.8 mgd

70 (0.03 mgd ÷ 178.8 mgd) x 100 = 0.02%

Additionally, the Project's net increase in average daily wastewater generation of 0.03 mgd plus the current average flows of approximately 275 mgd to the HWRP would represent approximately 61.1 percent[71] of the HWRP's capacity of 450 mgd. With regard to future flows, the Project's net increase of 0.03 mgd plus the projected flows of approximately 271.2 mgd to the HWRP would represent approximately 60.3 percent[72] of the HWRP's assumed future capacity of 450 mgd.

Based on the above, there is adequate treatment capacity to serve the Project's projected demand in addition to existing LASAN commitments. As such, the Project would 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. Impacts would be less than significant, and no mitigation measures are required. No further analysis 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 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 and commercial developments within the City. Solid waste transported by both public and private haulers is either recycled, reused, or transformed at a waste-to-energy facility, or disposed of at a landfill. Landfills within the County of Los Angeles (County) are categorized as either Class III or inert waste landfills. Non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste such as construction waste, yard trimmings, and earth-like waste are disposed of in inert waste landfills.[73] Ten Class III landfills and one inert waste landfill with solid waste facility permits are currently serving the County.[74] In addition, there is one solid waste transformation facility within the County that converts, combusts, or otherwise processes solid waste for the purpose of energy recovery.

Based on 2021 Countywide Integrated Waste Management Plan (CoIWMP) Annual Report, the most recent report available, the total remaining Class III landfill capacity in the County is estimated at 137.09 million tons. In 2021, approximately 6.24 million tons of solid waste were disposed of at the County's Class III landfills and approximately 0.375 million tons of solid waste were disposed of at County transformation facilities.[75] The estimated remaining capacity for the Class III landfills open to

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71 [(0.03 mgd + 275 mgd) ÷ 450 mgd] x 100 = 61.12 (~ 61.1%)

72 [(0.03 mgd + 271.2 mgd) ÷ 450 mgd] x 100 = ~60.3

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

74 County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2021 Annual Report, December 2022. The 10 Class III landfills serving the County include the Antelope Valley Landfill, the Burbank Landfill, the Calabasas Landfill, Chiquita Canyon Landfill, Lancaster Landfill, Pebbly Beach Landfill, San Clemente Landfill, the Scholl Canyon Landfill, the Sunshine Canyon City and County Landfill, and the Whittier/Savage Canyon Landfill. Azusa Land Reclamation is the only permitted Inert Waste Landfill in the County that has a full solid waste facility permit.

75 County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2021 Annual Report, December 2022, Figure 6.

the City is approximately 127.44 million tons.[76]. In addition, the permitted inert waste landfill serving the County is Azusa Land Reclamation. This facility currently has 50.77 million tons of remaining capacity.[77] The 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.[78]

Additionally, the City's Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA) Plan sets a goal of becoming a "zero waste" city by 2030. To this end, the City implements a number of source reduction and recycling programs such as curbside recycling, home composting demonstration programs, and construction and demolition debris recycling.[79] The City is currently diverting 76 percent of its waste from landfills.[80] The City has adopted the goal of achieving 90 percent diversion by 2025, and zero waste by 2030.

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

Construction

As discussed in Section 3, Project Description, of this Initial Study construction of the Project would include the construction of 234,601 square feet of new commercial uses. Pursuant to the requirements of SB 1374, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Materials that could be recycled or salvaged include asphalt, glass, and concrete. Debris not recycled could be accepted at the unclassified landfill (Azusa Land Reclamation) within the County and within the Class III landfills open to the City. Furthermore, 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. Thus, although the total diversion rate may ultimately exceed 75 percent, this analysis conservatively assumes a diversion rate of 75 percent.

As shown in Table 4 on page 78 of this Initial Study, based on construction and debris rates established by the United States Environmental Protection Agency and after accounting for mandatory recycling, it is conservatively calculated that the Project would generate approximately 1,980 tons of construction-related waste. This amount of construction and debris waste would

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

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

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

79 LA Sanitation, Solid Waste Integrated Resource Plan, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-zwswirp?_adf.ctrl-state=148ffk6elf_78&_afrLoop=5743103707890135&_afrWindowMode=0&_afrWindowId=null#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D5743103707890135%26_afrWindowMode%3D0%26_adf.ctrl-state%3D148ffk6elf_82, accessed June 14, 2023.

80 LA Sanitation, Recycling, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?_adf.ctrl-state=alxbkb91s_4&_afrLoop=18850686489149411#!, accessed June 14, 2023.

Table 4
Project Demolition and Construction Waste Generation

Building	Size	Generation Rate (lbs/square feet)[a]	Total (tons)
Construction Waste			
Office	224,597 sf	3.89	437
Restaurant	5,894 sf [c]	3.89	12
Retail	4,110 sf	3.89	8
Construction Waste Subtotal			*457*
Demolition Waste			
Surface Parking[b]	96,268 sf	155	7,461
Demolition Waste Subtotal			*7,461*
Total for Construction and Demolition Waste			***7,918***
Total After 75-Percent Recycling			**1,980**

lbs = pound

sf = square feet

[a] *United States Environmental Protection Agency, Report No. EPA530-98-010, Characterization of Building-Related Construction and Demolition Debris in the United States, June 1998, Tables 3, 4, 5, and 6. Generation rates used in this analysis are based on an average of individual rates assigned to specific building types.*

[b] *No demolition rate for surface parking is included in the USEPA report. Therefore, the average construction and demolition rate for non-residential debris is used to provide a conservative estimate.*

[c] *The Project would also include approximately 1,799 square feet of outdoor uncovered dining area adjacent to the ground floor restaurant, which is not considered "Floor Area" as defined in the LAMC, but is nevertheless counted towards the Project's restaurant area for purposes of this environmental analysis. As such, for purposes of this environmental analysis, the Project would include 5,894 square feet of restaurant space.*

Source: Eyestone Environmental, 2024.

represent approximately 0.004 percent of the Azusa Land Reclamation Landfill's remaining disposal capacity of 50.77 million tons.[81] It should be noted that soil export is not typically included in the calculation of construction waste to be landfilled 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 .

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 Checklist Question No. XIX(e) regarding consistency with City solid waste planning goals).

[81] (1,980 ÷ 50.77 million tons) * 100 = 0.004 percent.

Therefore, Project construction impacts to solid waste facilities would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

Operation

As shown in Table 5 on page 80 of this Initial Study, based on solid waste generation factors from LASAN, the Project would result in a net increase in solid waste generation of approximately 1,932 tons per year. The estimated solid waste is conservative because the waste generation factors used do not account for recycling or other waste diversion measures, such as compliance with AB 341, which requires California commercial enterprises and public entities that generate 4 cubic yards or more per week of waste, and multi-family housing with five or more units, to adopt recycling practices. Likewise, the analysis does not include implementation of the City's Zero Waste Plan, 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.[82]

The estimated net increase in solid waste that would be generated by the Project represents approximately 0.002 percent of the remaining capacity (127.44 million tons) for the Class III landfills serving the City.[83] 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.

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

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82 LA Sanitation, Solid Waste Integrated Resource Plan, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-zwswirp?_adf.ctrl-state=148ffk6elf_78&_afrLoop=5743103707890135&_afrWindowMode=0&_afrWindowId=null#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D5743103707890135%26_afrWindowMode%3D0%26_adf.ctrl-state%3D148ffk6elf_82, accessed June 14, 2023.

83 (1,932 tons per year/127.44 million tons) x 100 ≈ 0.002%

Table 5
Estimated Project Solid Waste Generation

Building	Size	Employee Generation Rate per thousand square feet[a]	Estimated Number of Employees[a]	Solid Waste Generation Rate[b]	Total Generation (tons/year)
Proposed					
Office	224,597 sf	4	898 emp	2.02 tons/emp/year	1,814
Restaurant	5,894 sf[c]	6.7	40 emp	1.92 tons/emp/year	77
Retail	4,110 sf	2	8 emp	5.08 tons/emp/year	41
Total Proposed					**1,932**

emp = employees

lbs = pounds

sf = square feet

[a] *Los Angeles Department of Transportation (LADOT) and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020.*

[b] *Solid waste generation rates are from CalRecycle's Disposal and Diversion Rates for Business Groups, www2.calrecycle.ca.gov/wastecharacterization/businessgrouprates, accessed April 12, 2024. To present a conservative analysis, the Services – Professional Technical, & Financial rate was used for the office use and Retail Trade – Food & Beverage Stores rate was used for the retail use because these categories have the highest generation rates.*

[c] *The Project would also include approximately 1,799 square feet of outdoor uncovered dining area adjacent to the ground floor restaurant, which is not considered "Floor Area" as defined in the LAMC, but is nevertheless counted towards the Project's restaurant area for purposes of this environmental analysis. As such, for purposes of this environmental analysis, the Project would include 5,894 square feet of restaurant space.*

Source: Eyestone Environmental, 2024.

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[84] 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.

[84] 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.

The Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an on-site recycling area or room of specified size.[85] 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?	☐	☐	☐	☒
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?

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

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 (a–d). The Project Site is located in an urbanized area, and there are no wildlands located in the vicinity of the Project Site. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone or Fire District No. 1, which consists of areas identified by the City that are required to meet additional development regulations to reduce fire hazard-related risks.[86] 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 would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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?	☒	☐	☐	☐

[86] City of Los Angeles, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for 130 W. College Street, January 15, 2024.

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. Therefore, the Project would not have the potential to 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.

As discussed above, the Project's potential environmental impacts for the following subject areas will be further analyzed in the EIR: air quality; cultural resources; energy; geology and soils (paleontological resources); greenhouse gas emissions; hazards and hazardous materials; land use and planning; noise; transportation; tribal cultural resources; and utilities and service systems (water supply and energy infrastructure).

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 that of 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: air quality; cultural resources; energy; geology and soils (paleontological resources); greenhouse gas emissions; hazards and hazardous materials; land use and planning; noise; transportation; tribal cultural resources; and utilities and service systems (water supply and energy infrastructure.

With regard to agriculture and forestry resources, biological resources, and mineral resources, no such resources are located on the Project Site or in the surrounding area. In addition, the Project would have no impact on these resources, and therefore could not combine with other projects to result in cumulative impacts. Therefore, cumulative impacts to agriculture and forestry resources, biological resources, and mineral resources would be less than significant.

As analyzed above, the Project would not result in significant impacts to geology and soils. Thus, the Project would not contribute to any cumulative impacts associated with geology and soils. In addition, 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. While cumulative development would expose a greater number of people to seismic hazards, as with the Project, related projects would be subject to

local, State, and federal regulations and standards for seismic safety. Thus, Project impacts related to geology and soils would not be cumulatively considerable and would be less than significant.

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 and, for applicable projects, NPDES permit requirements, including development of SWPPPs for construction projects greater than 1 acre, compliance with SUSMP requirements during operation, and compliance with other local requirements pertaining to hydrology and surface water quality. It is anticipated that related projects would also be evaluated on an individual basis by the Department of Public Works to determine appropriate BMPs and treatment measures to avoid significant impacts to hydrology and surface water quality. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to hydrology and water quality. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

In terms of population and housing, related development would not induce substantial population growth since most of the City is already fully developed and occupied by a long-standing residential population. In addition, not all related projects include residential uses and therefore would not contribute to population growth. As discussed in the analysis above, the Project does not propose residential uses and thus would not directly contribute to population growth. 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. Overall, the Project's contribution would not be cumulatively considerable since no residential units are proposed, and cumulative impacts related to population and housing would be less than significant.

With regard to fire protection, the increase in development and residential service populations from the Project, related projects, and other future development in the service areas of the above-mentioned fire stations would result in a cumulative increase in the demand for LAFD services. However, similar to the Project, the related projects and other future development projects in the Community Plan area would be reviewed by the LAFD to ensure that sufficient fire safety and hazards measures are implemented. Furthermore, each related project and other future development projects would be required to comply with regulatory requirements related to fire protection services. In addition, the Project, related projects, and other future development projects would be subject to the City's standard construction permitting process, which includes a review by LAFD for compliance with building and site design standards related to fire/life safety, as well as coordinating with LADWP to ensure that local fire flow infrastructure meets current code standards for the type and intensity of land uses involved. Furthermore, given that the Project Site is located within an urban area, each of the related projects, as well as other future developments, would likewise be developed within urbanized locations that fall within an acceptable distance from one or more existing fire stations. In addition, as with the Project, the related projects and other future development projects in the vicinity, would also generate revenues to the City's General Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new fire station facilities and related staffing, as deemed appropriate. Cumulative increases in demand for fire protection services due to related projects and other future development projects would be identified and addressed through the City's annual

programming and budgeting processes. LAFD resource needs would be identified and monies allocated according to the priorities at the time. Any requirement for a new fire station, or the expansion, consolidation, or relocation of an existing fire station, would also be identified through this process, the impacts of which would be addressed accordingly. Furthermore, over time, LAFD would continue to monitor population growth and land development throughout the City and identify additional resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction, which may become necessary to achieve the required level of service. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant

With regard to police protection, it is anticipated that the Project in combination with the related projects would increase the demand for police protection services. This cumulative increase in demand for police protection services would increase demand for additional LAPD staffing, equipment, and facilities over time. Similar to the Project, other projects served by LAPD would implement safety and security features according to LAPD recommendations. LAPD would continue to monitor population growth and land development throughout the City and identify additional resource needs including staffing, equipment, vehicles, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City's annual budgeting efforts, LAPD's resource needs would be identified and monies allocated according to the priorities at the time. Any new or expanded police station would be funded via existing mechanisms (e.g., property and sales taxes, government funding, and developer fees) to which the Project and cumulative growth would contribute. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

With regard to public services such as schools, parks/recreational facilities, and libraries, the Project would not generate a residential population that could increase the demand for schools, parks/recreational facilities, and libraries. Therefore, the Project would not contribute to an increased demand for these services. Other related projects could increase the demand for these services and facilities. However, the applicants for those projects would be required to pay mitigation impact fees for identified impacts under applicable regulatory requirements. Specifically, in the case of schools, the applicants for some related projects may be required to pay school impact fees, which would offset any potential impact to schools associated with the related projects. Similarly, in the case of parks and recreational facilities (i.e., existing neighborhood and regional parks), projects would be required by the LAMC to include open space and amenity spaces (e.g. gyms, outdoor decks with pools, etc.) and pay park fees (as required), which would help reduce the demand on neighborhood and regional parks, thereby reducing the likelihood that there would be substantial deterioration of parks. Employees generated by the non-residential related projects would be more likely to use parks and library facilities near their homes during non-work hours, as opposed to patronizing local facilities on their way to or from work or during their lunch hours. In addition, each related project would generate revenues to the City's General Fund (in the form of property taxes, sales tax, business tax, transient occupancy tax, etc.) that could be applied toward the provision of enhancing park facilities and library services in the City, 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 to schools, parks/recreational facilities, and libraries. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

With respect to wastewater, since the HWRP is in compliance with the State's wastewater treatment requirements, and the wastewater generated by the related projects would be typical of urban uses, no industrial discharges into the wastewater system would occur that would exceed the wastewater treatment requirements of the LARWQCB. Additionally, as discussed above, the HWRP currently treats 275 mgd of wastewater and has remaining capacity for 175 mgd. Consequently, there would be no need to construct new or expand wastewater treatment facilities, the construction of which could cause significant environmental effects. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to the wastewater treatment systems. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

With regard to stormwater infrastructure, as with the Project, related projects would be required to comply with the requirements of the City's LID Ordinance. In accordance with the City's LID Ordinance, related projects would also implement BMPs to capture a specified amount of runoff within the Project Site and reduce the potential impact of increased runoff to existing drainage systems. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to stormwater infrastructure. As such, the Project's contribution 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.

The Project in conjunction with related projects would increase the need for solid waste disposal during their respective construction periods. However, unclassified landfills in the County do not generally have capacity concerns, and inert landfills serving the Project and related projects would have sufficient capacity to accommodate construction waste disposal needs. With regard to operational solid waste disposal needs, the increase in solid waste generated by the Project would be well within the capacity of existing landfills, as discussed in Checklist Question No. XIX of this Initial Study. In addition, with the implementation of solid waste policies and objectives intended to help achieve the requirements of AB 939 and the City's 90 percent diversion goal by 2025, it is expected that the Project and related projects would not substantially reduce the projected timeline for landfills within the region to reach capacity. Furthermore, the County conducts ongoing evaluations to ensure that landfill capacity is adequate to serve the forecasted disposal needs of the region. Therefore, cumulative impacts with respect to solid waste would be less than significant.

As discussed above, 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 requirements pertaining to fire safety. Specifically, Section 57.106.5.2 of the LAMC provides that the Fire Chief shall have the authority to require drawings, plans, and sketches as necessary to identify access points, fire suppression devices and systems, utility controls, and stairwells; Section 57.118 of the LAMC establishes LAFD's fire/life safety plan review and LAFD's fire/life safety

inspection for new construction projects; and Section 57.507.3.1 establishes fire water flow standards. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to wildfire. 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; energy; geology and soils (paleontological resources); greenhouse gas emissions; hazards and hazardous materials; land use and planning; noise; transportation; tribal cultural resources; and Utilities and Service Systems (water supply and energy infrastructure). As a result, these potential effects will be analyzed further in the EIR.