



INITIAL STUDY

SOUTH LOS ANGELES COMMUNITY PLAN AREA

Honda of Downtown Los Angeles Dealership Relocation

Case Number: ENV-2016-1036-MND

Project Location: 704–820 West Martin Luther King Jr. Boulevard and 703–705 West 40th Place

Council District: 9 – Curren D. Price, Jr.

Project Description: The subject of this Initial Study is the relocation of Honda of Downtown Los Angeles to 704–740 and 800–820 West Martin Luther King Jr. Boulevard, and 703–705 West 40th Place (the “Project”). Honda of Downtown Los Angeles is an existing automotive sales and service business currently located at Figueroa Street and Venice Boulevard in downtown Los Angeles. The Applicant is seeking to relocate Honda of Downtown Los Angeles to West Martin Luther King Jr. Boulevard and the southeast and southwest corners of South Hoover Street (the “proposed project site”).

The proposed project site currently contains surface parking lots, an approximately 4,175-square-foot, two-story building, and three (3) billboard sign structures. The proposed project would involve the demolition of the existing building, billboard sign structures, and parking lots, and the construction of two new structures. The structure at the southeast corner of the South Hoover Street/West Martin Luther King Jr. Boulevard intersection would contain the primary dealership uses and vehicle service facilities (the “East Structure”). Additionally, a structure providing dealership uses and vehicle storage would be constructed at the southwest corner of the intersection (the “West Structure”). Both structures would reach five stories, six levels in height.

APPLICANT:

Celebrity Realty Holdings LLC
1540 South Figueroa Street
Los Angeles, California 90015

PREPARED BY:

Meridian Consultants LLC
910 Hampshire Rd., Ste. V
Westlake Village, CA 91361

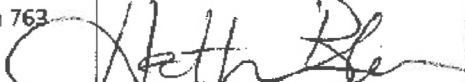
ON BEHALF OF:

City of Los Angeles
Department of City Planning

LOS ANGELES, CA 90012
 CALIFORNIA ENVIRONMENTAL QUALITY ACT
PROPOSED MITIGATED NEGATIVE DECLARATION

LEAD CITY AGENCY: City of Los Angeles, Department of City Planning		COUNCIL DISTRICT: 9 - Price, Jr.
PROJECT TITLE: Honda of Downtown Los Angeles Dealership Relocation	ENVIRONMENTAL CASE: ENV-2016-1036-MND	CASE NOS: CPC-2016-1032-GPA-ZC-HD-BL-ZAD-SPR; CPC-2016-1034-DA
PROJECT LOCATION: 704–820 West Martin Luther King Jr. Boulevard and 703–705 West. 40th Place		
<p>PROJECT DESCRIPTION: The proposed project involves the demolition of an existing two-story, approximately 4,175-square-foot building, billboard structures, and surface parking lots and the construction, use, and maintenance of two new five-story structures that will contain dealership uses, vehicle service facilities and vehicle storage. Vehicular access to the site will be provided from West Martin Luther King Jr. Boulevard, which runs in an east–west direction adjacent to the north side of the proposed project site, Hoover Street, which runs in a north-south direction between the two proposed structures, and 40th place, which runs in an east-west direction adjacent to the south of the eastern lot. The East Structure, consisting of 152,477 square feet of floor area, would consist of the primary dealership and vehicle service facilities at the southeast corner of the Hoover Street/West Martin Luther King Jr. Boulevard intersection. The West Structure, consisting of 105,075 square feet of floor area, will provide dealership uses and vehicle storage would be constructed at the southwest corner of the intersection.</p> <p>The applicant is requesting a General Plan Amendment from High Medium Residential to Community Commercial, a Zone Change, a Height District Change, Building Line Adjustment, Zoning Administrator’s Determination, and Site Plan Review. The proposed project would require excavation and export of approximately 2,600 cubic yards of soil. Approximately nine street trees bordering the site (eight <i>Pinus canariensis</i> – Canary Island Pines and one <i>Washingtonia robusta</i> – Mexican Fan Palm) within the public right-of-way may be removed, trimmed, or otherwise disturbed during construction (Appendix B).</p>		
NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY		
Celebrity Realty Holdings LLC 1540 South Figueroa Street Los Angeles, California 90015		
<p>FINDING: The Department of City Planning of the City of Los Angeles has proposed that a mitigated negative declaration be adopted for this project. The mitigation measures outlined on the attached pages will reduce any potentially significant adverse effects to a level of insignificance.</p>		
SEE ATTACHED SHEET(S) FOR ANY MITIGATION MEASURES IMPOSED		
Any written comment received during the public review period is attached together with the response of the Lead City Agency. The project decision-maker may adopt the mitigated negative declaration, amend it, or require preparation of an EIR. Any changes made should be supported by substantial evidence in the record and appropriate findings made.		

THE INITIAL STUDY PREPARED FOR THIS PROJECT IS ATTACHED

NAME OF PERSON PREPARING FORM	TITLE	TELEPHONE NUMBER
Courtney Shum	Planning Assistant	(213) 978-1916
ADDRESS	SIGNATURE (Official)	DATE
200 North Spring Street, Room 763 Los Angeles, CA 90012		June 8, 2016

AIR QUALITY

III-90 Air Quality

Air quality impacts from project implementation due to construction-related emissions may occur. However, the potential impact may be mitigated to a less than significant level by the following measures:

- **AQ-1** All off-road construction equipment greater than 50 horsepower (hp) shall meet US EPA Tier 4 emission standards, where available, to reduce NO_x, PM₁₀ and PM_{2.5} emissions at the proposed project site. In addition, all construction equipment shall be outfitted with Best Available Control Technology devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
- **AQ-2** Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks) and if the Lead Agency determines that 2010 model year or newer diesel trucks cannot be obtained, the Lead Agency shall require trucks that meet U.S. EPA 2007 model year NO_x emissions requirements.
- **AQ-3** At the time of mobilization of each applicable unit of equipment, a copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided.
- **AQ-4** Encourage construction contractors to apply for SCAQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for SCAQMD "SOON" funds. The "SOON" program provides funds to accelerate cleanup of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at: [http://www.aqmd.gov/home/programs/business/business-detail?title=offroad - diesel-engines&parent=vehicle-engine-upgrades](http://www.aqmd.gov/home/programs/business/business-detail?title=offroad-diesel-engines&parent=vehicle-engine-upgrades).

III-20 Air Pollution (Auto Repair Garage)

Adverse impacts upon adjacent residential properties may result due to auto repair work and dust from auto repair and servicing. However, these impacts shall be mitigated to a less than significant level by the following measures:

- All auto repair work shall be conducted within enclosed buildings that have been designed with appropriate pollution controls and ventilation systems.

III-30 Expose Sensitive Receptors to Pollutants (Auto-Repair Garage)

Environmental impacts to adjacent residential properties may result due to air quality and dust from auto repair and servicing. However, these impacts can be mitigated to a less than significant level by requiring the following measure:

- No window or door opening shall be permitted along the sides of the buildings facing residential.

BIOLOGICAL RESOURCES

IV-20 Habitat Modification (Nesting Native Birds, Non-Hillside or Urban Areas)

- Proposed project activities (including disturbances to native and nonnative vegetation, structures, and substrates) should take place outside of the breeding season for birds which generally runs from March 1 to August 31 (and as early as February 1 for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill (California Fish and Wildlife Code Section 86).
- If proposed project activities cannot feasibly avoid the breeding season, no earlier than 30 days prior to the disturbance of suitable nesting habitat, the Applicant shall:
 - a. Arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within properties adjacent to the proposed project site, as access to adjacent areas allows. The survey shall be conducted by a Qualified Biologist with experience in conducting breeding bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than three days prior to the initiation of clearance/construction work.
 - b. If a protected native bird is found, the Applicant shall delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species until August 31.
 - c. Alternatively, the Qualified Biologist could continue the survey in order to locate any nests. If an active nest is located, clearing and construction (within 300 feet of the nest or as determined by a qualified biological monitor) shall be postponed until the nest is vacated and juveniles have fledged, and when there is no

evidence of a second attempt at nesting. The buffer zone from the nest shall be established in the field with flagging and stakes. Construction personnel shall be instructed on the sensitivity of the area.

- d. If the Qualified Biologist determines that a narrower buffer between the construction activities and the observed active nests is warranted, the Qualified Biologist may submit a written explanation as to why (e.g., species-specific information; ambient conditions and bird's habituation to them; terrain, vegetation, and birds' lines of sight between the construction activities and the nest and foraging areas) to the City and, upon request, the CDFW. Based on the submitted information, the City, acting as the Lead Agency (and CDFW, if CDFW requests) shall comply with the buffer zone recommended in the Qualified Biologist report.
- e. The Applicant shall record the results of the recommended protective measures described previously to document compliance with applicable State and federal laws pertaining to the protection of native birds. Such record shall be submitted and received into the case file for the associated discretionary action permitting the proposed project.

V-70

Tree Removal (Non-Protected Trees)

- Prior to the issuance of any permit, a plot plan shall be prepared indicating the location, size, type and general condition of all existing trees on the site and within the adjacent public right(s)-of-way.
- All significant (8-inch or greater trunk diameter, or cumulative trunk diameter if multitrunked, as measured 54 inches above the ground) nonprotected trees on the site proposed for removal shall be replaced at a 1:1 ratio with a minimum 24-inch box tree. Net new trees, located within the parkway of the adjacent public right(s)-of-way, may be counted toward replacement tree requirements.
- Removal or planting of any tree in the public right-of-way requires approval of the Board of Public Works. All trees in the public right-of-way shall conform to the current standards of the Department of Public Works, Urban Forestry Division, Bureau of Street Services.

IV-90

Tree Removal (Public Right-of-Way)

- Removal of trees in the public right-of-way requires approval by the Board of Public Works.
- The required Tree Report shall include the location, size, type, and condition of all existing trees in the adjacent public right-of-way and shall be submitted for review

and approval by the Urban Forestry Division of the Bureau of Street Services, Department of Public Works (213-847-3077).

- The plan shall contain measures recommended by the tree expert for the preservation of as many trees as possible. Measures such as replacement by a minimum of 24-inch box trees in the parkway and on the site, on a 1:1 basis, shall be required for the unavoidable loss of significant (8-inch or greater trunk diameter, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground) trees in the public right-of-way.
- All trees in the public right-of-way shall be provided per the current Urban Forestry Division standards.

GEOLOGY AND SOILS

GEO-1 Prior to the issuance of building permits, the Applicant shall submit a design level geotechnical report, prepared by a registered civil engineer or certified engineering geologist, to the Department of Building and Safety for review and approval. The geotechnical report shall assess potential consequences of estimation of settlement, lateral movement, or reduction in foundation soil-bearing capacity, and discuss measures that may include building design consideration. Building design considerations shall include but are not limited to ground stabilization, selection of appropriate foundation type and depths, selection of appropriate structural systems to accommodate anticipated displacements, or any combination of these measures. The proposed project shall comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the proposed project, and as it may be subsequently amended or modified.

GREENHOUSE GAS EMISSIONS

VII-10 Greenhouse Gas Emissions

- Low- and non-VOC containing paints, sealants, adhesives, solvents, asphalt primer, and architectural coatings (where used), or pre-fabricated architectural panels shall be used in the construction of the project.
- Any new construction shall include 20 percent of parking spaces set aside for EV-ready parking.

NOISE

XII-20 Increased Noise Levels (Demolition, Grading, and Construction Activities)

- The proposed project shall comply with the City Noise Ordinance No. 144,331 and 161,574, and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.
- Demolition and construction activities shall, to the extent feasible, be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.
- The proposed project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices, to the extent feasible.
- Sound curtains or an equivalent sound attenuating device capable of achieving a 10 dB reduction shall be placed along the northern, southern, and western property boundary prior to commencement of construction. The sound curtain or equivalent sound attenuating device shall be engineered and erected according to applicable codes.

XII-40 Increased Noise Levels (Parking Structure Ramps):

Environmental impacts adjacent to residential properties may result from proposed project implementation due to noise from cars using the parking ramp. However, the potential impacts will be mitigated to a less than significant level by the following measures:

- Concrete, not metal, shall be used for construction of parking ramps.
- The interior ramps shall be textured to prevent tire squeal at turning areas.
- Parking lots located adjacent to residential buildings shall have a solid decorative wall adjacent to the residential.

XII-80 Increased Noise Levels (Auto-Repair Garage):

Environmental impacts adjacent to residential properties may result from proposed project implementation due to mobile noise from the auto-repair garage. However, these impacts will be mitigated to a less than significant level by the following measure:

- No openings shall be permitted on any building façade which abuts a residential use or zone.

PUBLIC SERVICES

XIV-10 Public Services (Fire)

- The following recommendations of the Fire Department relative to fire safety shall be incorporated into the building plans, which includes the submittal of a plot plan for approval by the Fire Department prior to the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant, and entrances to any dwelling unit or guest room shall be no more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.

XIV-20 Public Services (Police – Demolition/Construction Sites)

- Temporary construction fencing shall be placed along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to keep unpermitted persons from entering the construction area.

XIV-30 Public Services (Police)

- The plans shall incorporate the *Design Guidelines* (defined in the following sentence) relative to security, semi-public and private spaces, which may include, but not be limited to, access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the project site if needed. Please refer to *Design Out Crime Guidelines: Crime Prevention Through Environmental Design*, published by the Los Angeles Police Department. Contact the Community Relations Division, located at 100 West 1st Street, #250, Los Angeles, CA 90012; (213) 486-6000. These measures shall be approved by the Police Department prior to the issuance of building permits.

XIV-50 Public Services (Schools affected by Haul Route)

- LADBS shall assign specific haul route hours of operation based upon Pacific Charter Middle School and/or Charter Middle School hours of operation.

- Haul route scheduling shall be sequenced to minimize conflicts with pedestrians, school buses and cars at the arrival and dismissal times of the school day. Haul route trucks shall not be routed past the school during periods when school is in session especially when students are arriving or departing from the campus.

TRANSPORTATION AND TRAFFIC

XVI-30 Transportation (Haul Route)

- The developer shall install traffic signs in accordance with the LAMC around the site to ensure pedestrian and vehicle safety.

XVI-80 Transportation/Traffic

The proposed project will result in impacts to transportation and/or traffic systems. However, the impact can be reduced to a less than significant level through compliance with the following measure(s):

- Applicant shall plan construction and construction staging as to maintain pedestrian access on adjacent sidewalks throughout all construction phases. This requires the applicant to maintain adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding, etc.) from work space and vehicular traffic and overhead protection, due to sidewalk closure or blockage, at all times.
- Temporary pedestrian facilities should be adjacent to the proposed project site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility.
- Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects.
- Applicant shall keep sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction staging. Sidewalk shall be reopened as soon as reasonably feasible taking construction and construction staging into account.

**CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CA 90012
CALIFORNIA ENVIRONMENTAL QUALITY ACT
INITIAL STUDY and CHECKLIST (CEQA Guidelines Section 15063)**

LEAD CITY AGENCY: City of Los Angeles, Department of City Planning	COUNCIL DISTRICT: CD 9 - Curren D. Price, Jr.	DATE: May 13, 2016
RESPONSIBLE AGENCIES: Department of City Planning		
PROJECT TITLE/NO.: Honda of Downtown Los Angeles Dealership Relocation		
ENVIRONMENTAL CASE: ENV-2016-1036-MND	RELATED CASES: CPC-2016-1032-GPA-ZC-HD-BL-ZAD-SPR; CPC-2016-1034-DA	
PREVIOUS ACTIONS CASE NO.	<input type="checkbox"/> DOES have significant changes from previous actions. <input checked="" type="checkbox"/> DOES NOT have significant changes from previous actions.	
<p>PROJECT DESCRIPTION: The proposed project involves the demolition of an existing two-story, approximately 4,175-square-foot building, billboard structures, and surface parking lots and the construction, use, and maintenance of two new five-story structures that will contain dealership uses, vehicle service facilities and vehicle storage. Vehicular access to the site will be provided from West Martin Luther King Jr. Boulevard, which runs in an east–west direction adjacent to the north side of the proposed project site, Hoover Street, which runs in a north-south direction between the two proposed structures, and 40th place, which runs in an east-west direction adjacent to the south of the eastern lot. The East Structure, consisting of 152,477 square feet of floor area, would consist of the primary dealership and vehicle service facilities at the southeast corner of the Hoover Street/West Martin Luther King Jr. Boulevard intersection. The West Structure, consisting of 105,075 square feet of floor area, will provide dealership uses and vehicle storage would be constructed at the southwest corner of the intersection.</p> <p>The applicant is requesting a General Plan Amendment from High Medium Residential to Community Commercial, a Zone Change, a Height District Change, Building Line Adjustment, Zoning Administrator’s Determination, and Site Plan Review. The proposed project would require excavation and export of approximately 2,600 cubic yards of soil. Approximately nine street trees bordering the site (eight <i>Pinus canariensis</i> – Canary Island Pines and one <i>Washingtonia robusta</i> – Mexican Fan Palm) within the public right-of-way may be removed, trimmed, or otherwise disturbed during construction (Appendix B).</p>		
<p>ENVIRONMENTAL SETTING: The proposed project site consists of a total of 291,134 gross square feet and 257,552 square feet FAR floor area of lot area and currently contains surface parking lots, an approximately 4,175-square-foot, two-story building, and three (3) billboards that will be removed as part of the proposed project. The occupied area will be the east building and will consist of 45,839 square feet. The surrounding properties are developed with commercial, medium- to high- medium residential uses, public facilities, and surface parking lots. Further details are provided in the Section 4.0, Environmental Analysis (attached).</p>		

PROJECT LOCATION: 704–820 West Martin Luther King Jr. Boulevard and 703–705 West. 40th Place		
COMMUNITY PLAN AREA: South Los Angeles STATUS: <input type="checkbox"/> Preliminary <input checked="" type="checkbox"/> Does Conform to Plan <input type="checkbox"/> Proposed <input type="checkbox"/> Does NOT Conform to Plan		AREA PLANNING COMMISSION: South Los Angeles CERTIFIED NEIGHBORHOOD COUNCIL: Voices of 90037
EXISTING ZONING: C2-1; R3-1	MAX DENSITY ZONING: 1.5:1 FAR in C2-1; 3:1 FAR in R3-1	LA River Adjacent: No
GENERAL PLAN LAND USE: Community Commercial; High Medium Residential	MAX. DENSITY PLAN: 1.5:1 FAR in CC; 3:1 FAR in HMR	PROPOSED PROJECT DENSITY: 3.58 FAR (East Structure); 3.83 FAR (West Structure)

Determination (To be completed by Lead Agency)

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A **MITIGATED NEGATIVE DECLARATION** will be prepared.
- I find the proposed project MAY have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required.
- I find the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An **ENVIRONMENTAL IMPACT REPORT** is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or **NEGATIVE DECLARATION** pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or **NEGATIVE DECLARATION**, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



 Signature

Planning Assistant

 Title

(213) 978-1916

 Phone

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 than 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 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 significant.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

<input type="checkbox"/> AESTHETICS <input type="checkbox"/> AGRICULTURE AND FORESTRY RESOURCES <input type="checkbox"/> AIR QUALITY <input type="checkbox"/> BIOLOGICAL RESOURCES <input type="checkbox"/> CULTURAL RESOURCES <input type="checkbox"/> GEOLOGY AND SOILS <input type="checkbox"/> GREENHOUSE GAS EMISSIONS	<input type="checkbox"/> HAZARDS AND HAZARDOUS MATERIALS <input type="checkbox"/> HYDROLOGY AND WATER QUALITY <input type="checkbox"/> LAND USE AND PLANNING <input type="checkbox"/> MINERAL RESOURCES <input type="checkbox"/> NOISE	<input type="checkbox"/> POPULATION AND HOUSING <input type="checkbox"/> PUBLIC SERVICES <input type="checkbox"/> RECREATION <input type="checkbox"/> TRANSPORTATION AND TRAFFIC <input type="checkbox"/> UTILITIES <input type="checkbox"/> MANDATORY FINDINGS OF SIGNIFICANCE
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INITIAL STUDY CHECKLIST (To be completed by the Lead City Agency)

BACKGROUND

Proponent Name:

Celebrity Realty Holdings LLC

Phone Number:

(213) 749-2331

Applicant Address:

1540 South Figueroa Street
 Los Angeles, CA 90015

Agency Requiring Checklist:

City of Los Angeles
 Department of City Planning
 Environmental Analysis Section

Date Submitted: March 24, 2016

Proposal Name (if applicable):

Honda of Downtown Los Angeles Project

Draft Initial Study

Honda of Downtown Los Angeles

City of Los Angeles

Prepared for:

City of Los Angeles
Department of City Planning
200 North Spring Street, Room 763
Los Angeles, CA 90012

Prepared by:

Meridian Consultants LLC
910 Hampshire Road, Suite V
Westlake Village, CA 91361

May 2016

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1.0 PROJECT INFORMATION

Project Title:	Honda of Downtown Los Angeles Dealership Relocation
Project Location:	704–820 West Martin Luther King Jr. Boulevard 703–705 West 40th Place Los Angeles, California 90037
Project Applicant	Celebrity Realty Holdings LLC 1540 South Figueroa Street Los Angeles, California 90015
Lead Agency:	City of Los Angeles Department of City Planning 200 North Spring Street, Room 721 Los Angeles, CA 90012

PROJECT SUMMARY

The Applicant is seeking to construct a new facility for the existing Honda of Downtown Los Angeles to West Martin Luther King Jr. Boulevard (“MLK Blvd.”) and the southeast and southwest corners of South Hoover Street (“Hoover St.”) (collectively the “proposed project site” or “site”). The proposed project site is currently developed with surface parking lots, an approximately 4,175-square-foot, a two-story building, and three (3) billboards that will be demolished as part of the proposed project.

The proposed new structure at the southeast corner of the Hoover St./MLK Blvd. intersection would contain the primary dealership uses and vehicle service facilities (the “East Structure”). Additionally, a structure providing dealership uses and vehicle storage would be constructed at the southwest corner of the intersection (the “West Structure”). Both structures would reach five stories, six levels in height, including a rooftop parking area.

ORGANIZATION OF INITIAL STUDY

This Initial Study is organized into six sections as follows:

Section 1.0, Project Information, provides introductory information such as the proposed project title, the proposed project Applicant, and the Lead Agency and a summary of the proposed project.

Section 2.0, Existing Conditions, describes the existing conditions, surrounding land uses, general plan, and existing zoning of the proposed project site. This section also identified other related projects within the surrounding area.

Section 3.0, Project Description, provides a detailed description of the proposed project, including the proposed project characteristics, proposed project objectives, and environmental clearance requirements.

Section 4.0, Environmental Analysis, includes an analysis of each resource topic and identifies impacts of implementing the Proposed project. It also identifies mitigation measures, if applicable. This section follows the Initial Study Checklist in Appendix G to the State CEQA Guidelines, (California Code of Regulations, Title 14, Chapter 3, Sections 15000–15387) and the City of Los Angeles *CEQA Thresholds Guide*.

Section 5.0, References, identifies all printed references and individuals cited in this Initial Study.

Section 6.0, List of Preparers, identifies the individuals who prepared this report and their areas of technical specialty.

The following appendices present data supporting the analysis or contents of this Initial Study.

- **Appendix A**, Air Quality and Greenhouse Gas Modeling Results
- **Appendix B**, Tree Letter
- **Appendix C**, Cultural Resource Records Search
- **Appendix D**, Geotechnical Study
- **Appendix E**, Phase I and Phase II ESA
- **Appendix F**, Noise Background and Modeling Data
- **Appendix G.1**, Department of Transportation Approval Letter
- **Appendix G.2**, Traffic Study

This Initial Study is a preliminary analysis prepared by and for the City of Los Angeles as the Lead Agency to determine whether an Environmental Impact Report (“EIR”), Negative Declaration (“ND”), or Mitigated Negative Declaration (“MND”) must be prepared for a project. An MND is prepared for a project when the Initial Study has identified potentially significant impacts on the environment, but (1) revisions in the project plans or proposals made, or agreed to by the applicant, before the Negative Declaration and Initial Study are released for public review would avoid or mitigate the impacts to a point where no significant impact on the environment would occur; and (2) there is no substantial evidence in light of the whole record before the public agency that the project, as revised, may have a significant impact on the environment.

Implementation of the proposed project could cause some potentially significant impacts on the environment, but as shown in the environmental analysis contained in this Initial Study, all of the proposed project’s potentially significant impacts would be reduced to less than significant levels through the implementation of mitigation measures. Consequently, the analysis contained herein concludes that an MND shall be prepared for the Proposed project.

2.0 EXISTING CONDITIONS

PROJECT LOCATION

The proposed project site is located in South Los Angeles at the intersection of MLK Blvd. and Hoover St. The regional location of the proposed project site is shown in **Figure 2.0-1, Regional Location Map**. The proposed project site is bound by MLK Blvd. to the north, medium-residential uses to the east, West 40th Place to the south, and medium-residential uses to the west. The proposed project site includes 704–740 MLK Blvd. and 703-705 West 40th Place (Assessor’s Parcel Numbers 5019-025-023, -024, and -026; and 5019-025-911 and -912) and 800–820 MLK Blvd. (Assessor’s Parcel Number 5019-001-034),¹ as shown in **Figure 2.0-2, Parcel Map of Project Site**.

SITE CONDITIONS

The eastern portion of the proposed project site is approximately 1.0 acre in size and consists of surface parking, a single commercial building, and a billboard structure. The easternmost parcels (5019-025-911 and -912) and center parcels (5019-025-024 and -026) are fenced off into two separate event parking lots. The center parcel also includes a billboard. The parcel at the southeastern corner with Hoover St. contains a commercial building that is two stories in height and approximately 4,175 square feet in size.

The western portion of the proposed project site is approximately 0.6 acres in size and consists of a surface parking lot.

The street frontage along Hoover St. on the side of the site is improved with a concrete sidewalk. There are three street trees along the MLK Blvd. front of the site and six street trees along the western boundary of the West Structure that would be removed as part of the proposed project. There is also a bus stop with a bench along MLK Blvd. in front of the western portion of the site that would be removed as part of the proposed project site.

The aerial view of the proposed project site is shown in **Figure 2.0-3, Aerial View of the Project Sites**; and the existing conditions described previously are depicted in **Figures 2.0-4, Existing Conditions: 704–740 MLK Blvd.**, and **2.0-5, Existing Conditions: 800–820 MLK Blvd.**

ACCESS

Primary regional access to the area is provided by the Harbor Freeway (US 110), which runs in a north–south direction less than 0.5 miles east of the proposed project site. Primary access to and from US 110 is

¹ The City of Los Angeles currently owns 704–706 MLK Blvd. (APN 5019-025-912) and 703–703½ West 40th Place (APN 5019-025-911). The Applicant is in the process of acquiring these parcels in connection with the proposed project entitlements.

via West MLK Blvd., which runs in an east–west direction adjacent to the north side of the proposed project site. In addition, Interstate 10 (“I-10”) is located approximately two miles north. Primary access to and from the I-10 is via Figueroa Street, which runs in a north–south direction approximately 0.25 miles east of the proposed project site.

Major roadways providing access to the proposed project site include MLK Blvd., which runs in an east–west direction, and Figueroa Street and Vermont Avenue, which run in a north–south direction west of the proposed project site.

Metro Bus Route 40 travels east–west along MLK Blvd., with a stop in front of the western portion of the proposed project site. Other bus routes run north–south along Vermont Avenue and Figueroa Street. Light-rail transit access is provided by the Metro Silver and Expo Lines. The 37th Street/USC Station is located approximately 0.75 miles northeast of the proposed project site. The Vermont and USC Stations are located approximately 0.75 miles northwest and north, respectively, of the proposed project site.

SURROUNDING LAND USES

As shown in **Figure 2.0-3**, the proposed project site is located in a highly urbanized area of South Los Angeles. Surrounding uses include a mix of commercial, medium- to high- medium residential uses, public facilities, and surface parking lots. North of the proposed project site is Exposition Park, a 160-acre public facility that includes the Los Angeles Memorial Coliseum, the Los Angeles Memorial Sports Arena, the Natural History Museum of Los Angeles County, the California Science Center, the California African American Museum, and the EXPO Center which includes a recreation center, senior center, preschool and aquatic stadium. The portion of this area directly adjacent to the proposed project site consists of surface parking lots for these named public facilities.

To the south, east, and west of the proposed project site are medium to medium-high residential uses that are part of the neighborhood known as Vermont Square. These residential uses range from one to three stories in height. The nearby intersections of MLK Blvd. with Figueroa Street, and MLK Blvd. with Vermont Avenue, are characterized by community commercial uses that range from one to two stories in height.



SOURCE: NavigateLA - 2015; Meridian Consultants, LLC - September 2015

FIGURE 2.0-2



SOURCE: Google Earth - 2014

FIGURE 2.0-3



View looking north across site from W 40th Place



View looking northwest across site from W 40th Place

FIGURE 2.0-4



View looking west across site from Hoover Street



View looking west across site from corner of Hoover Street and Martin Luther King Boulevard

FIGURE 2.0-5

LAND USE AND ZONING DESIGNATIONS

The proposed project site is located within the South Los Angeles Community Plan (“Community Plan”) area of the City of Los Angeles. The Community Plan is intended to “promote an arrangement of land uses, streets, and services which will encourage and contribute to the economic, social and physical health, safety, welfare, and convenience of the people who live and work in the community.”² The Community Plan map designates the proposed project site as Community Commercial with a portion of the western end of the proposed project site designated as High-Medium Residential, as shown in **Figure 2.0-6, General Plan Land Use Map**.

The proposed project site is zoned C2-1 and R3-1, as shown in **Figure 2.0-7, Zoning Map**. The C2 Zone permits a range of retail and commercial uses, parking, and educational and community facilities, as well as the uses permitted in the R3 Zone. The R3 Zone permits apartment houses, multiple-family dwellings, single-family dwellings, childcare facilities, and community uses such as parks, playgrounds, and community centers. The Commercial zone’s Height District 1 permits a maximum FAR of 1.5:1, and the Residential zone’s Height District 1 permits a maximum FAR of 3:1. The Residential Zone also has a height limit of 45 feet. There is no height restriction in the Commercial Zone.

RELATED PROJECTS

In accordance with CEQA Guidelines Section 15064(h), this Initial Study includes an evaluation of the proposed project’s cumulative impacts. This guidance, provided under CEQA Guidelines Section 15064(h), is as follows:

- (1) *When assessing whether a cumulative effect requires an EIR, the lead agency shall consider whether the cumulative impact is significant and whether the effects of the project are cumulatively considerable. An EIR must be prepared if the cumulative impact may be significant and the project’s incremental effect, though individually limited, is cumulatively considerable.*

“Cumulatively considerable” means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

- (2) *A lead agency may determine in an initial study that a project’s contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus is not significant. When a project might contribute to a significant cumulative impact, but the contribution will be rendered less than cumulatively considerable through mitigation*

2 City of Los Angeles, *South Los Angeles Community Plan* (2000), II-2.

measures set forth in a mitigated negative declaration, the initial study shall briefly indicate and explain how the contribution has been rendered less than cumulatively considerable.

- (3) A lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program (including, but not limited to, water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plan, plans or regulations for the reduction of greenhouse gas emissions) that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area in which the project is located. Such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. When relying on a plan, regulation or program, the lead agency should explain how implementing the particular requirements in the plan, regulation or program ensure that the project's incremental contribution to the cumulative effect is not cumulatively considerable. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding that the project complies with the specified plan or mitigation program addressing the cumulative problem, an EIR must be prepared for the project.*
- (4) The mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the project's incremental effects are cumulatively considerable.*




To assess cumulative impacts, a list of related projects was compiled within the general vicinity of the proposed project, as indicated in **Table 2.0-1, Related Projects List**; the locations are shown in **Figure 2.0-8, Related Project Sites**. The list of related projects takes into account projects that could affect traffic conditions in the proposed project area and is based on information from a variety of sources, including the City of Los Angeles; other studies and reports, including the April 2016 Traffic Study prepared by LLG Engineers (**Appendix G.2**); and field verifications and observations.

**Table 2.0-1
Related Projects List**





#	Project Name	Address	Description/Land Use
1	LA Coliseum Renovation	3939 South Figueroa St.	Demolition of existing sports arena and construction of a new, 747,000-square-foot stadium that includes restaurant and retail uses.
2	Figueroa & Adams Student Housing	2455 South Figueroa St.	145-unit apartment building
3	California African American Museum Renovation	600 South State Dr.	Renovation of a 26,400square-foot existing museum and construction of 77,100 square feet of new space
4	Pacific Charter Middle School	1371 West 35th St.	300-student school
5	USC University Park Master Plan	USC University Park Campus	Construction of 2,500,000 square feet of university facilities; 307,000 square feet of retail, restaurant, and fitness center uses; a 2,000-seat theater; a 150-room hotel; and 2,215,000 square feet of school and student/faculty housing facilities.
6	USC All Sports Building	1010 West Jefferson Blvd.	91,130-square-foot athletic building
7	LA Football Club Sports Arena	3939 South Figueroa St.	Sports complex with 15,000 square feet of office uses; a 10,000-square-foot conference center; and 70,000 square feet of retail uses
8	South LA Redevelopment 3A	3671 South Vermont Ave.	80 residential units with 50,000 square feet of retail
9	Accelerated Charter Elementary School (ACES)	107 East Martin Luther King Jr. Blvd.	New 500-seat elementary school
10	Rolland Curtis Gardens	1077 West 38th St.	140 apartments with 9,000 square feet of retail
11	Charter Middle School	4900 South Main St.	450-student private middle school
12	USC Child Care Center	3014 South Royal St.	9,955-square-foot childcare center

GENERAL PLAN LAND USE



RESIDENTIAL

-  Low Medium II Residential
-  Medium Residential
-  High Medium Residential

COMMERCIAL



-  Highway Oriented Commercial
-  Highway Oriented and Limited Commercial
-  Community Commercial
-  Neighborhood Office Commercial

OPEN SPACE / PUBLIC FACILITIES

-  Open Space
-  Public Facilities



Legend:

-  Project Site
-  NOT TO SCALE

SOURCE: ZIMAS - 2015; Meridian Consultants, LLC - September 2015

FIGURE 2.0-6

GENERALIZED ZONING

- OS, GW
- R2, RD, RMP, RW2, R3, RAS, R4, R5
- CR, C1, C1.5, C2, C4, C5, CW, ADP, LASED, CEC, USC, PVSP
- P, PB
- PF



Legend:

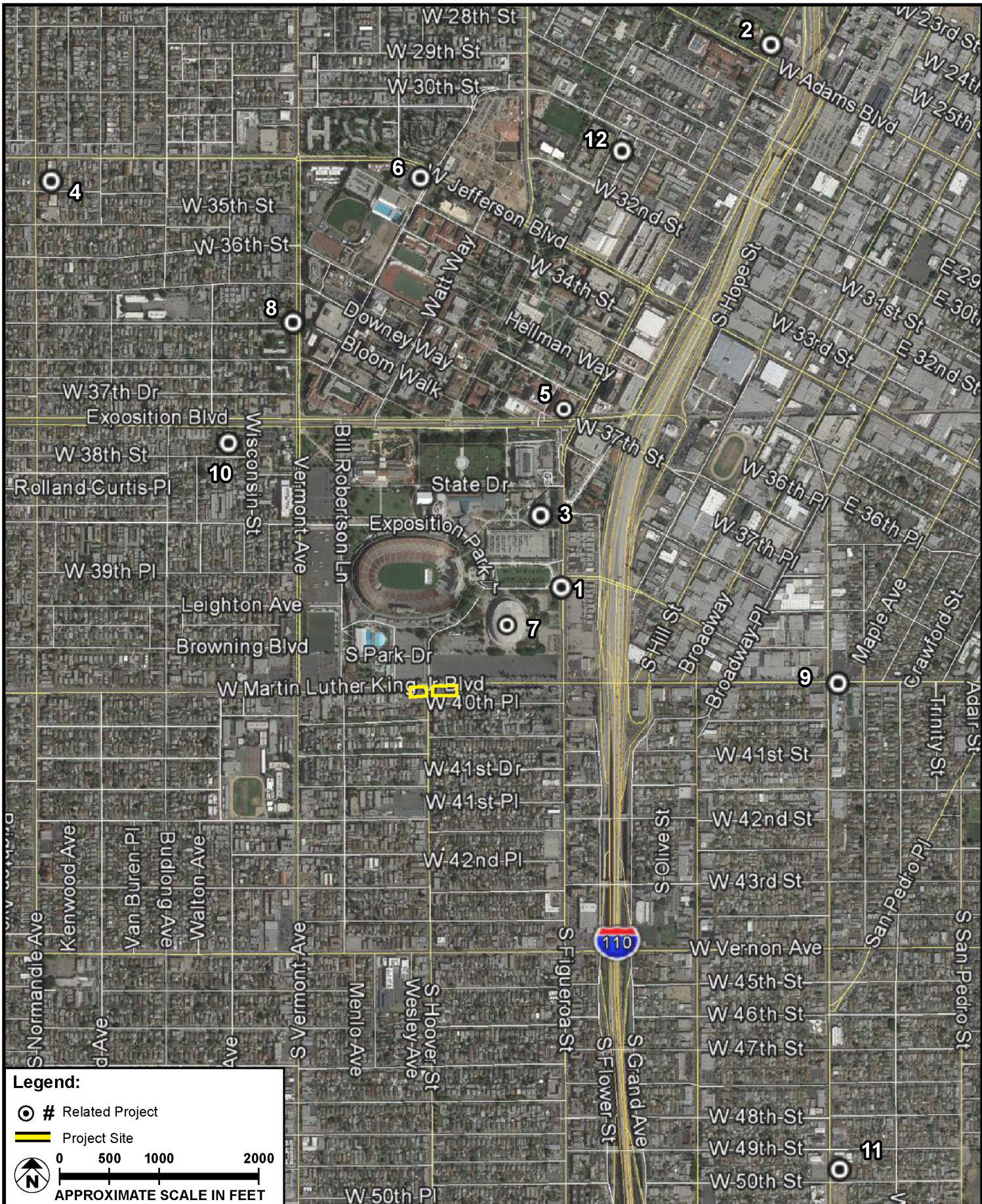
- Project Site
- NOT TO SCALE

SOURCE: ZIMAS - 2015; Meridian Consultants, LLC - September 2015

FIGURE 2.0-7



Zoning Map



SOURCE: Google Earth - 2016; Meridian Consultants, LLC - 2016

FIGURE 2.0-8



Related Project Sites

3.0 PROJECT DESCRIPTION

PROJECT CHARACTERISTICS

The proposed project would involve demolition of the existing building, parking lots, and billboards, and the construction, use, and maintenance of two new structures, consisting of a total of 257,552 square feet of FAR floor area, that would contain the new Downtown Los Angeles Honda dealership. The East Structure, consisting of 152,477 square feet of FAR floor area, would consist of the primary dealership and vehicle service facilities at the southeast corner of the Hoover St./MLK Blvd. intersection. The West Structure, consisting of 105,075 square feet of FAR floor area, would provide dealership uses and vehicle storage at the southwest corner of the intersection.

The East Structure would be developed on the eastern portion of the proposed project site (704–740 West MLK Blvd.), as shown in **Figure 3.0-1 Elevations—East Structure**. The East Structure would contain approximately 173,934 gross square feet of space in five stories, six above ground levels and would reach approximately 68 feet in height, with an additional approximately 10 feet to account for elevator shafts, rooftop lights and equipment. The first and second levels would feature approximately 22,000 square feet of occupied sales area, focused at the corner of MLK Blvd. and Hoover St., as shown in **Figure 3.0-2, Ground Floor Plan—East Structure** and **Figure 3.0-3, 2nd-Level Floor Plan—East Structure**. Approximately 3,000 square feet of occupied area would be dedicated for a car wash and technician support facility within level three, as shown in **Figure 3.0-4, 3rd-Level Floor Plan—East Structure**. Approximately 21,000 square feet of occupied area would be service bays and parts storage would be accommodated within level four, as shown in **Figure 3.0-5, 4th-Level Floor Plan—East Structure**. The balance of levels one through five, and the roof would contain customer parking, car wash and technician support facilities, and inventory storage, as depicted in **Figure 3.0-6, 5th-Level Plan—East Structure** and **Figure 3.0-7, Roof Plan—East Structure**.

The West Structure would be developed on the western portion of the proposed project site (800–820 MLK Blvd.). The West Structure would be developed with a five-story, six-level, approximately 54-foot-high West Structure, with an additional approximately 12 feet to account for elevator shafts, rooftop lights and equipment, as shown in **Figure 3.0-8a Elevations—West Structure; Figure 3.0-8b Elevations—West Structure; Figure 3.0-9, Ground Floor Plan—West Structure; Figure 3.0-10, 2nd–5th-Level Floor Plan—West Structure; and Figure 3.0-11, Roof Plan—West Structure**. This structure, which would contain approximately 117,200 gross square feet of space, would be used for dealership uses and sales inventory.

Zoning

The proposed automotive uses are permitted in the C2 Zone, though not in the R3 Zone. As such, the proposed project also includes rezoning the R3 portion of the site to the C2 Zone. Zoning Height District 1

limits commercial density to an FAR of 1.5:1. FAR is a measure of the ratio between the square footage of the use and the square footage of the site. In calculating FAR, certain peripheral uses, specifically customer and employee parking, are not included. The calculated FAR for the East Structure is 3.58:1, and for the West Structure is 3.83:1. In addition, the proposed project exceeds the current Height District standard, and therefore the proposed project also includes a Height District change to Height District 2.

Parking

The East Structure would contain 92 parking spaces. For commercial uses, the parking ratio identified in Section 12.21A.4(c) is two spaces for each 1,000 square feet of occupied area, or 92 spaces required for the proposed project. The West Structure would be used for sales inventory and is not subject to LAMC parking requirements. Electrical vehicle charging stations would be provided at 20 percent of the visitor and employee parking spaces.

Access

Vehicular access to the East Structure would be provided via one existing driveway along MLK Blvd. and two existing driveways along 40th Place. The MLK Blvd. driveway is located along the south side of MLK Blvd., at the center of the East Structure frontage. The MLK Blvd. driveway would provide access to the customer parking lot that would serve the automobile sales area and would accommodate limited vehicular access (i.e., right-turn ingress and egress movements only). The 40th Place westerly driveway is located along the north side of 40th Place, at the center of the East Structure frontage. The 40th Place westerly driveway would also provide access to the customer parking lot that would serve the automobile sales area and would accommodate full vehicular access (i.e., left-turn and right-turn ingress and egress movements). The 40th Place easterly driveway is located along the north side of 40th Place at the southeast corner of the East Structure frontage. The 40th Place easterly driveway would primarily provide access to the vehicle service queuing area and would accommodate full vehicular access (i.e., left-turn and right-turn ingress and egress movements). In addition, two other "curb cuts" would be located along the north side of 40th Place, at the southwest corner of the East Structure. These curb cuts would provide access to the loading/storage and trash areas. The existing westerly and easterly driveways on MLK Blvd. serving the East Structure would be closed and removed as part of the proposed project. A main pedestrian entrance would be located at the southeast corner of MLK Blvd. and Hoover St. Service and delivery access would be via the eastern entrance on West 40th Place.

Vehicle access to the West Structure would be from the midblock alley on the south side of the site. There would be two new driveways along the alley, both of which would accommodate full vehicular access (i.e., left-turn and right-turn ingress and egress movements). The two (2) existing driveways serving the West Structure, one along the north side and one along the east, would be closed and removed. There would be a pedestrian entrance at the southwest corner of MLK Blvd. and Hoover St.

PROJECT CONSTRUCTION

For purposes of analyzing impacts, this Initial Study assumes a proposed project construction schedule of approximately 12 months, with final build-out completed by end of 2021. Construction activities associated with the proposed project would consist of three main steps: (1) demolition and site clearing; (2) site preparation and excavation; and (3) below-grade and above-grade building construction. The building construction phase includes the construction of the structures, connection of utilities to the buildings, application of architectural coatings, paving, and landscaping the proposed project site. A description of the construction phases and timelines is presented below:

Site clearing would occur for approximately one month and would include the scraping of asphalt surfaces, removal of billboards from the site, and the demolition of the existing building on the eastern portion of the proposed project site. Typical construction equipment includes concrete/industrial saws, dozers, graders, and tractors/loaders/backhoes.

After the completion of site clearing, a foundation phase for the proposed project would occur for approximately one month. This phase would involve shoring and excavation to ensure the proper base and slope for the building foundations. The proposed project would require the export of approximately 2,600 cubic yards of soil, all of which would be hauled off site. The proposed project would involve the balance of all excavated soil directly on site. Typical construction equipment includes excavators, dozers, and tractors/loaders/backhoes.

The building construction phase consists of above-grade structures and is expected to last for approximately seven months. Upon completion of the structures, architectural coating, finishing, and paving would occur. It is estimated that building finishing would occur over three months. Typical construction equipment includes cranes, forklifts, and tractors/loaders/backhoes.

Unless higher standards are included, all construction activities would be performed in accordance with all applicable State and federal laws and City Codes and policies with respect to building construction and activities. As provided in Section 41.40 of LAMC, the permissible hours of construction within the City are 7:00 AM to 9:00 PM, Monday through Friday, and between 8:00 AM and 6:00 PM on any Saturday or national holiday. No construction activities are permitted on Sundays. The proposed project would comply with these restrictions.

Construction activities may necessitate temporary lane closures on streets adjacent to the proposed project site on an intermittent basis for utility relocations/hookups, delivery of materials, and other construction activities as may be required. However, deliveries and the staging of all equipment and materials would be organized in the most efficient manner possible on site to mitigate any temporary

impacts to the neighborhood and surrounding traffic. Construction equipment would be staged on site for the duration of construction activities. Traffic-lane and right-of-way closures, if required, would be properly permitted by the City agencies and would conform to City standards.

For purposes of analyzing the construction-related impacts, it is anticipated that the excavation and soil export would involve 18-wheel bottom-dump trucks with a 16-cubic-yard hauling capacity. All truck staging would occur either on site or at designated off-site locations and radioed into the site to be filled. The local haul route for the proposed project site toward Interstate I-10 would utilize MLK Blvd. Approval of a haul route for the export of approximately 2,600 cubic yards of soil would be requested prior to construction. Approximately 41 weekly hauling round trips would be required (or seven round trips per day over a six-day workweek), yielding four weeks of hauling and a total of 163 round trips. The haul route specified above may be modified in compliance with City policies, provided the Los Angeles Department of Transportation (LADOT) and/or City of Los Angeles Bureau of Street Services approves any such modification.

AGENCY ACTIONS AND APPROVALS

To proceed with the proposed project, the application will require the following actions and approvals:

- **General Plan Map Amendment**

Pursuant to Section 11.5.6 of the LAMC and Section 555(a) of the City Charter, the proposed project would require a General Plan Amendment to the adopted South Los Angeles Community Plan's land use map. This amendment would change the designation for Assessor's Parcel Number 5019-001-034 from its current "High Medium Residential" designation to the "Community Commercial" land use designation, and would amend Footnote 1 of the Community Plan's General Plan Land Use Map to allow Height District 2.

- **Zone Change & Height District Change**

Pursuant to Sections 12.32F and 12.32Q of the LAMC, the proposed project would require a Zone Change and Height District Change for the Property from C2-1 and R3-1 to C2-2.

- **Site Plan Review**

Pursuant to Section 16.05 of the LAMC, the proposed project would require Site Plan Review because it would result in an increase of 50,000 gross square feet of nonresidential floor area.

- **Zoning Administrator Determination For Transitional Height**

Pursuant to Sections 12.24X22 of the LAMC, the proposed project would require a Zoning Administrator Determination to allow deviations from the Transitional Height Requirements of LAMC

Section 12.21.1A to permit heights of approximately 68 feet (East Structure) and 54 feet (West Structure) in lieu of the otherwise permitted 33 feet in a C zone property between 50 and 99 feet of an OS Zone and 61 feet between 100 and 199 feet in a C zone property between 100 feet and 199 feet of an OS Zone.

- **Building Line Elimination**

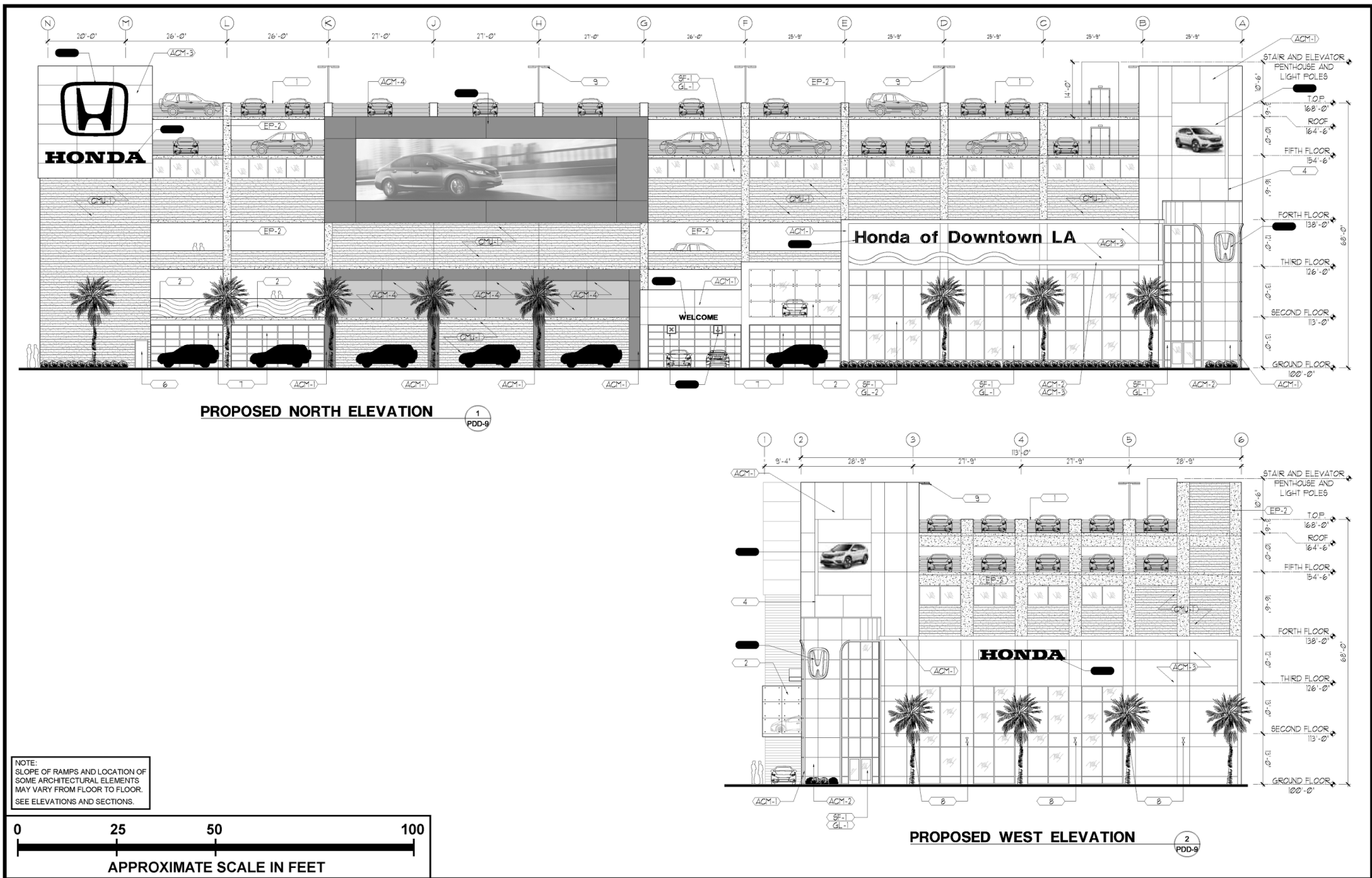
Pursuant to Section 558 of the City Charter, amend Ordinance Nos. 115573 and 123519 to remove the respective Building Lines within the Property along MLK Blvd.

- **Development Agreement**

Pursuant to California Government Code Sections 65864-65869.5, to enter into a Development Agreement with the City of Los Angeles.

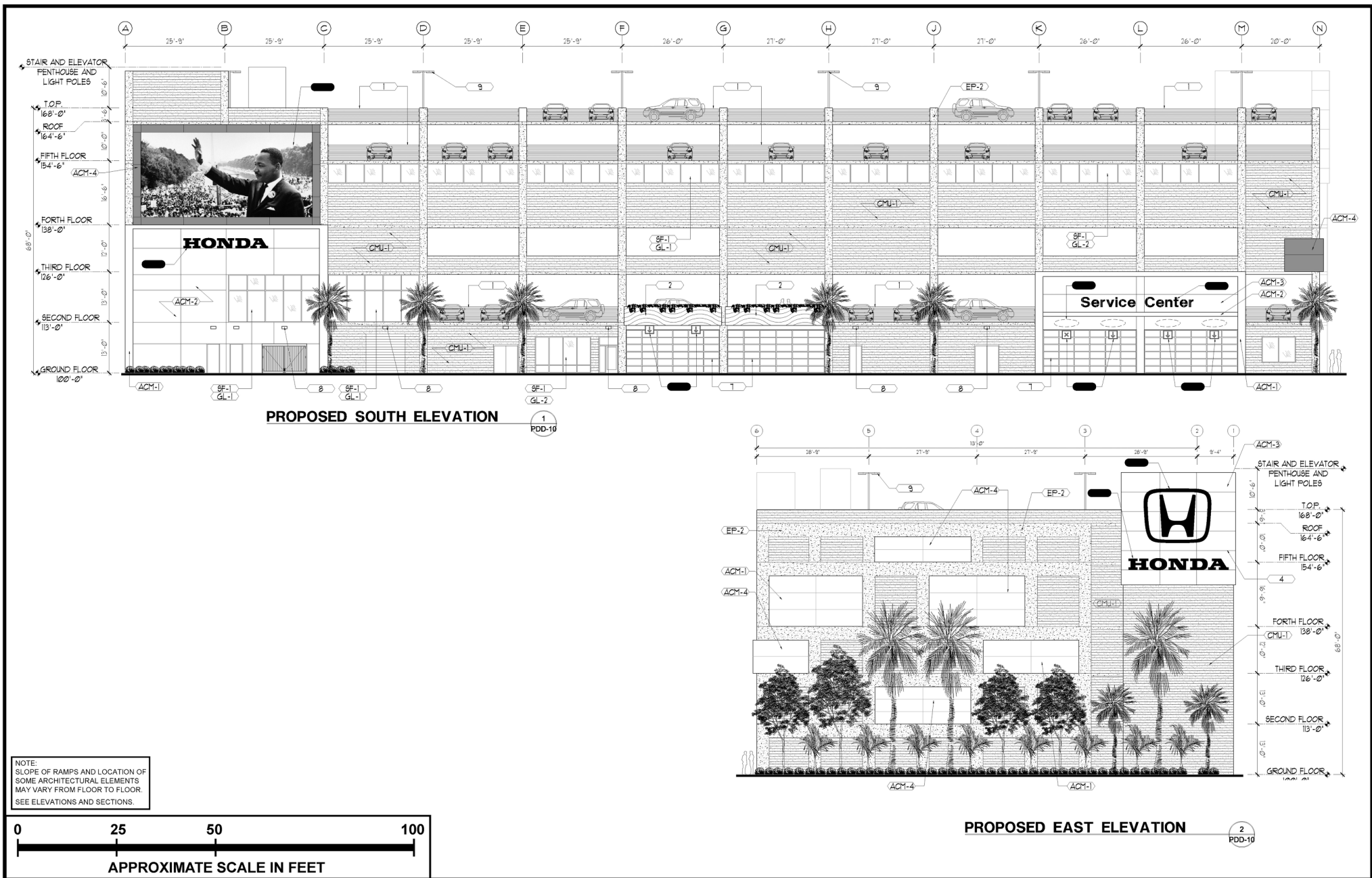
In addition to the specific discretionary actions identified above, several other approval actions may be required, including but not limited to various construction, safety and occupancy permits.

In addition, the Applicant will submit separate applications for entitlement and permit requests related to the proposed project. These will include approvals and permits from City departments, including the Department of Building and Safety and other municipal agencies for proposed project construction activities, including, but not limited to demolition, haul route, excavation, shoring, grading, foundation, and building and interior improvements, and Department of Public Works approval of street tree removals.



SOURCE: Wagner Architectural Group - May 2016

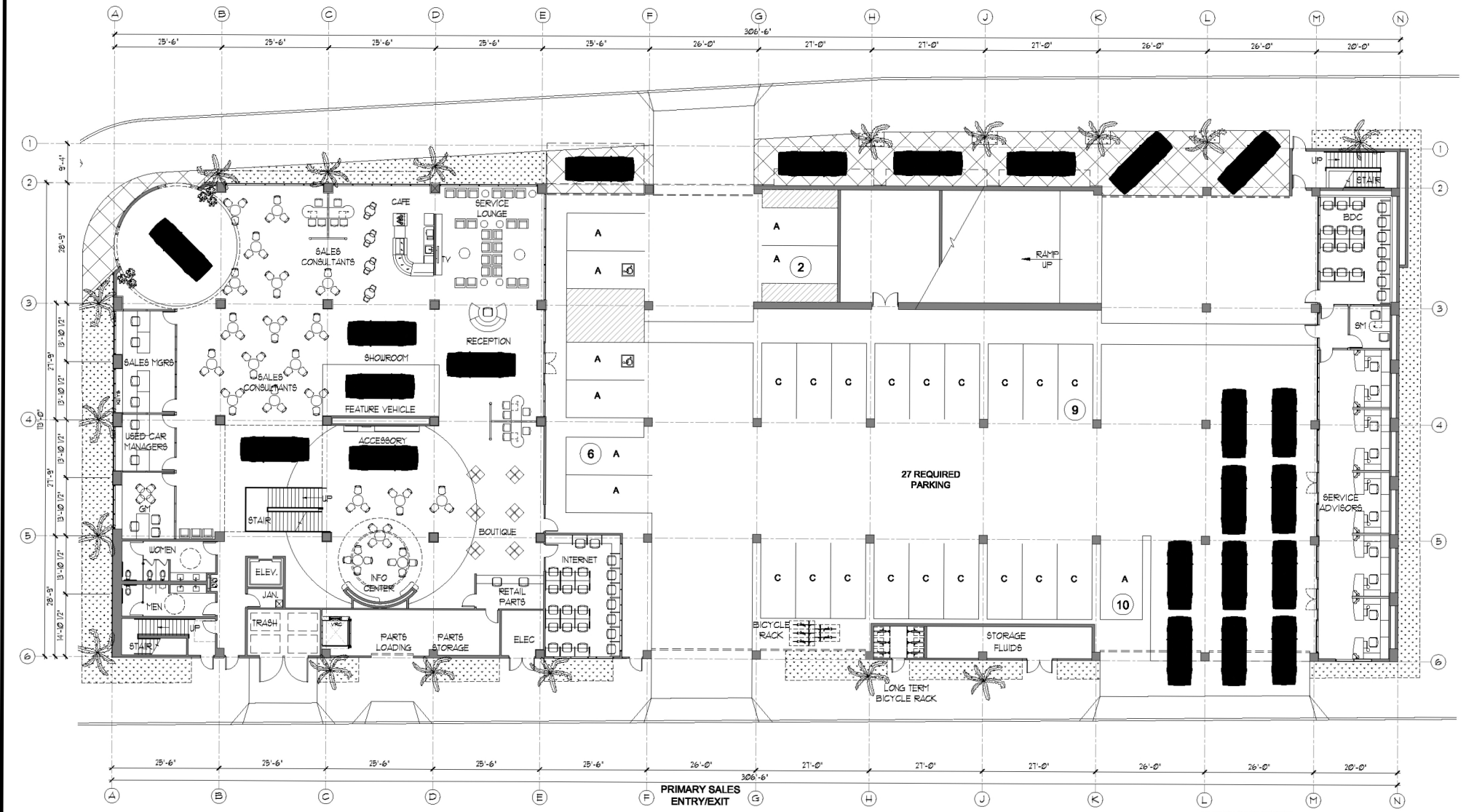
FIGURE 3.0-1a



SOURCE: Wagner Architectural Group - May 2016

FIGURE 3.0-1b

MARTIN LUTHER KING JR. BLVD.

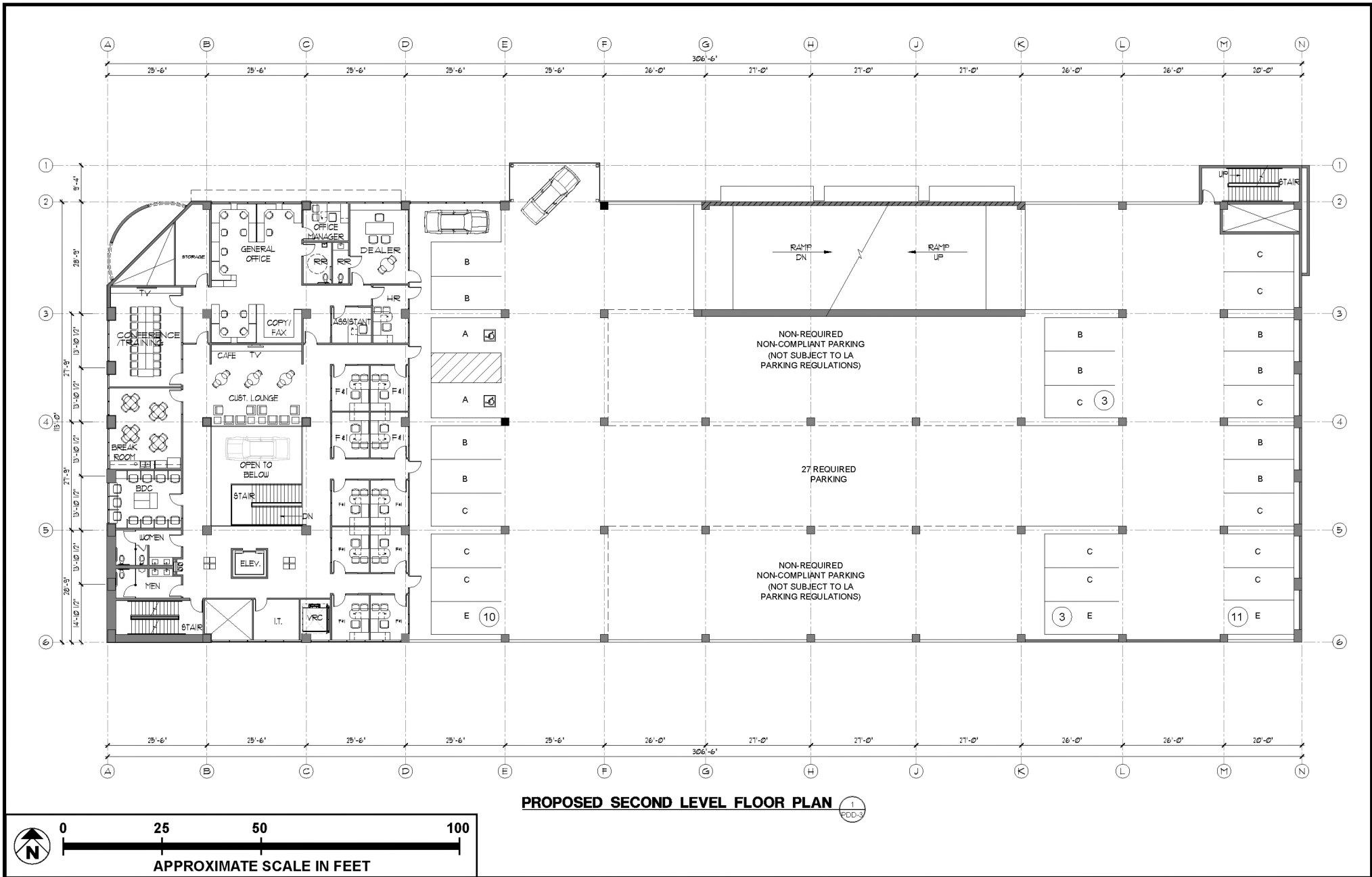


SOURCE: Wagner Architectural Group - May 2016

FIGURE 3.0-2

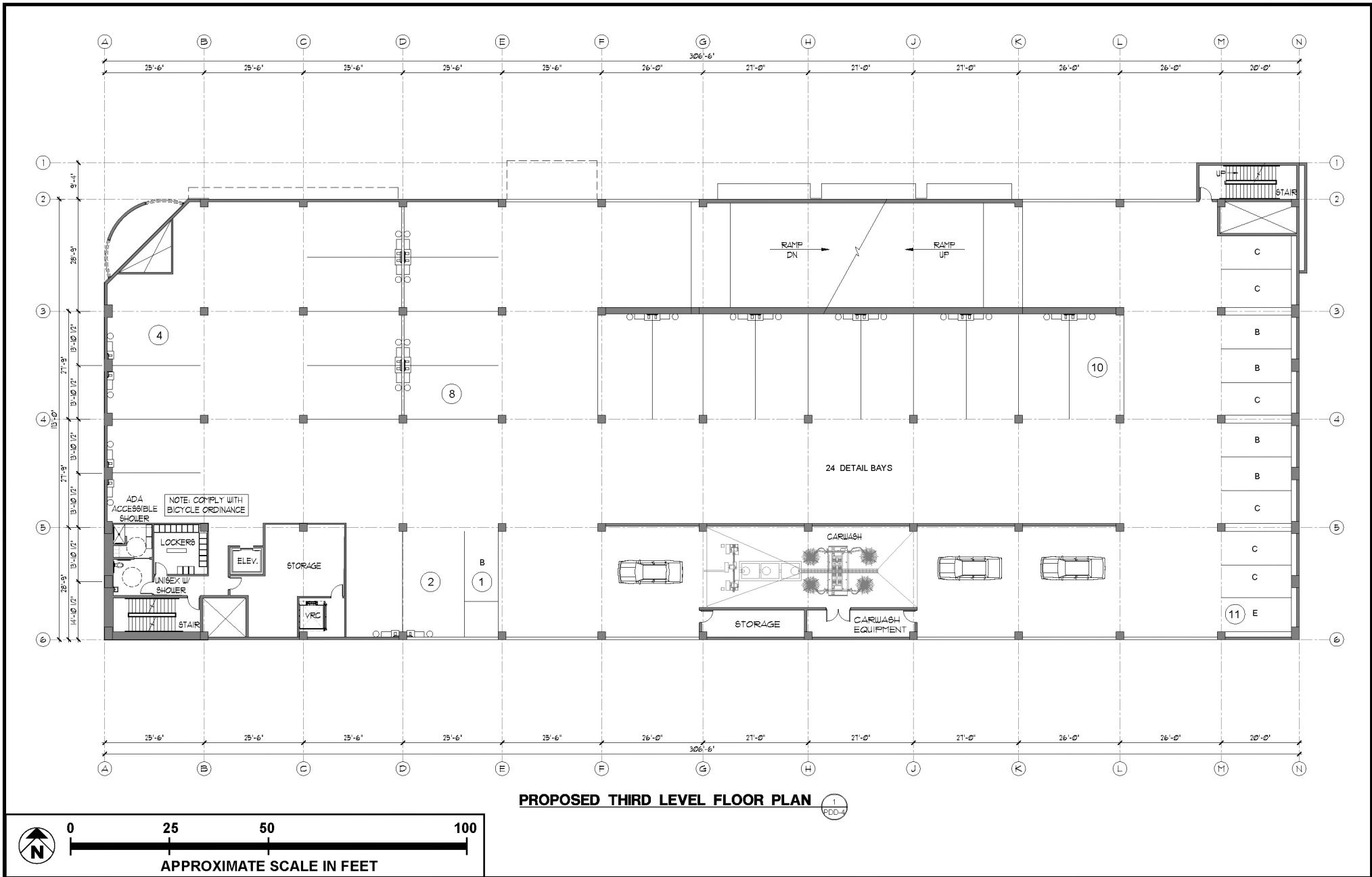


Ground Floor Plan—East Structure



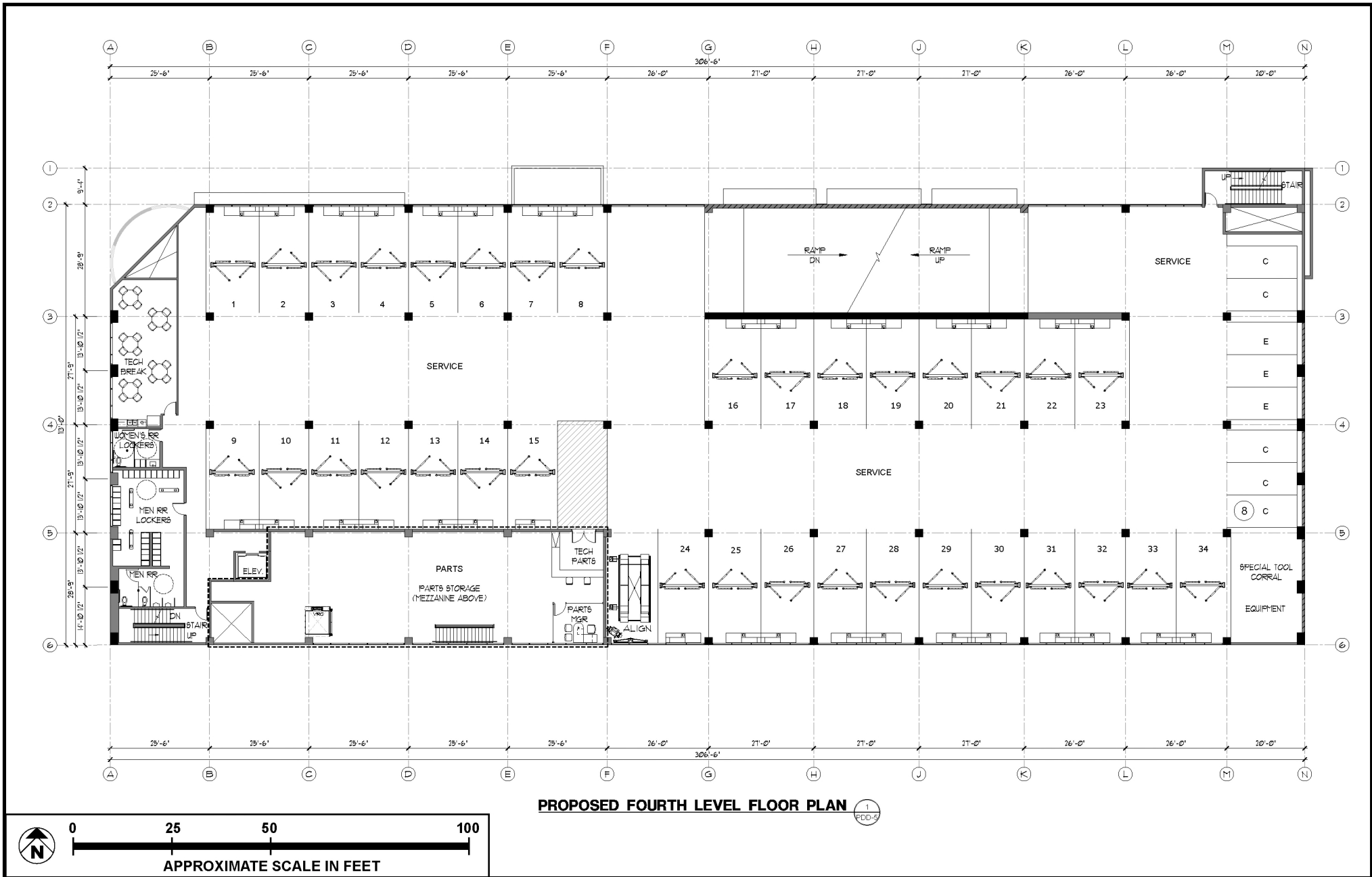
SOURCE: Wagner Architectural Group - May 2016

FIGURE 3.0-3



SOURCE: Wagner Architectural Group - May 2016

FIGURE 3.0-4

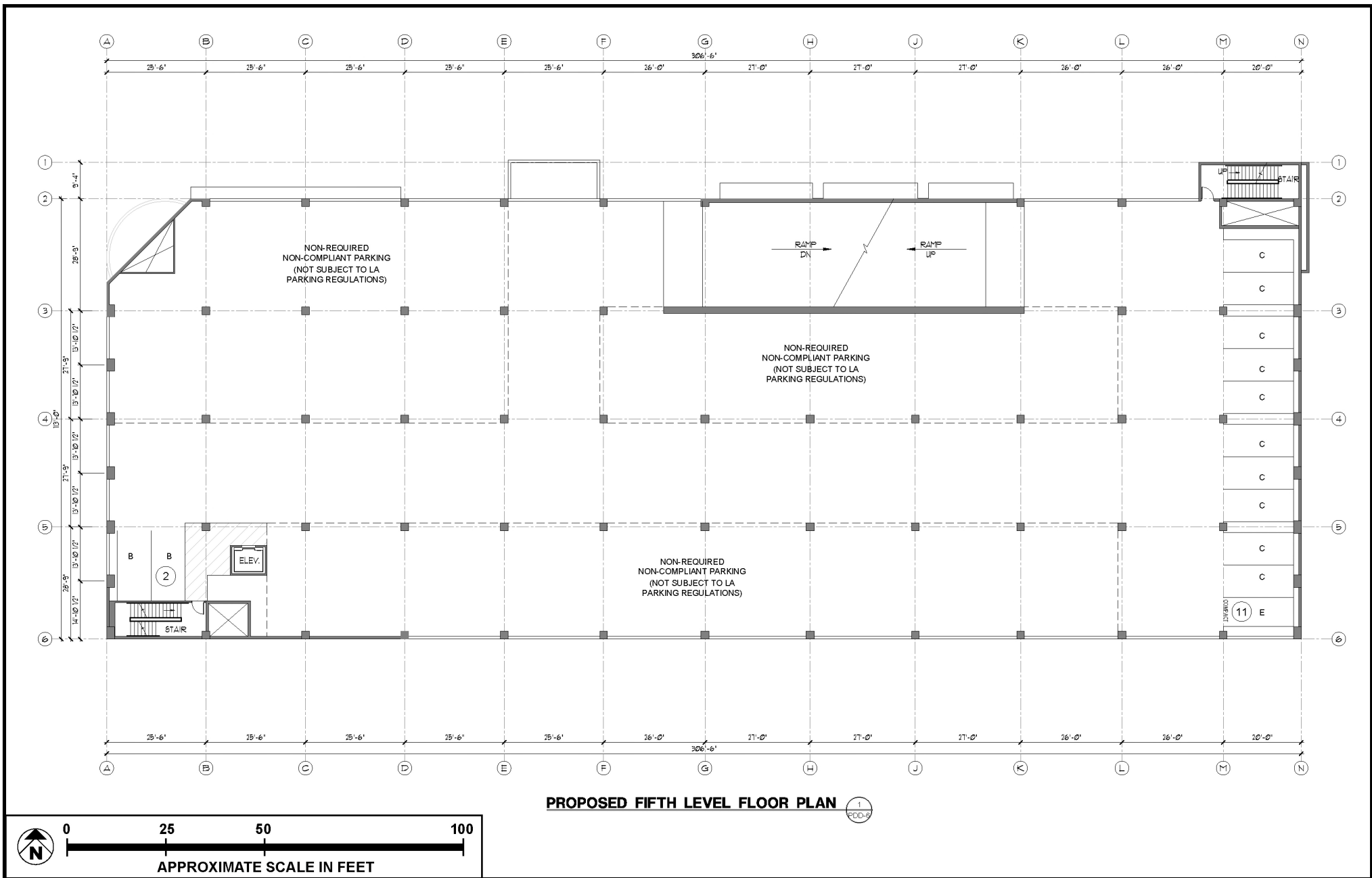


SOURCE: Wagner Architectural Group - May 2016

FIGURE 3.0-5

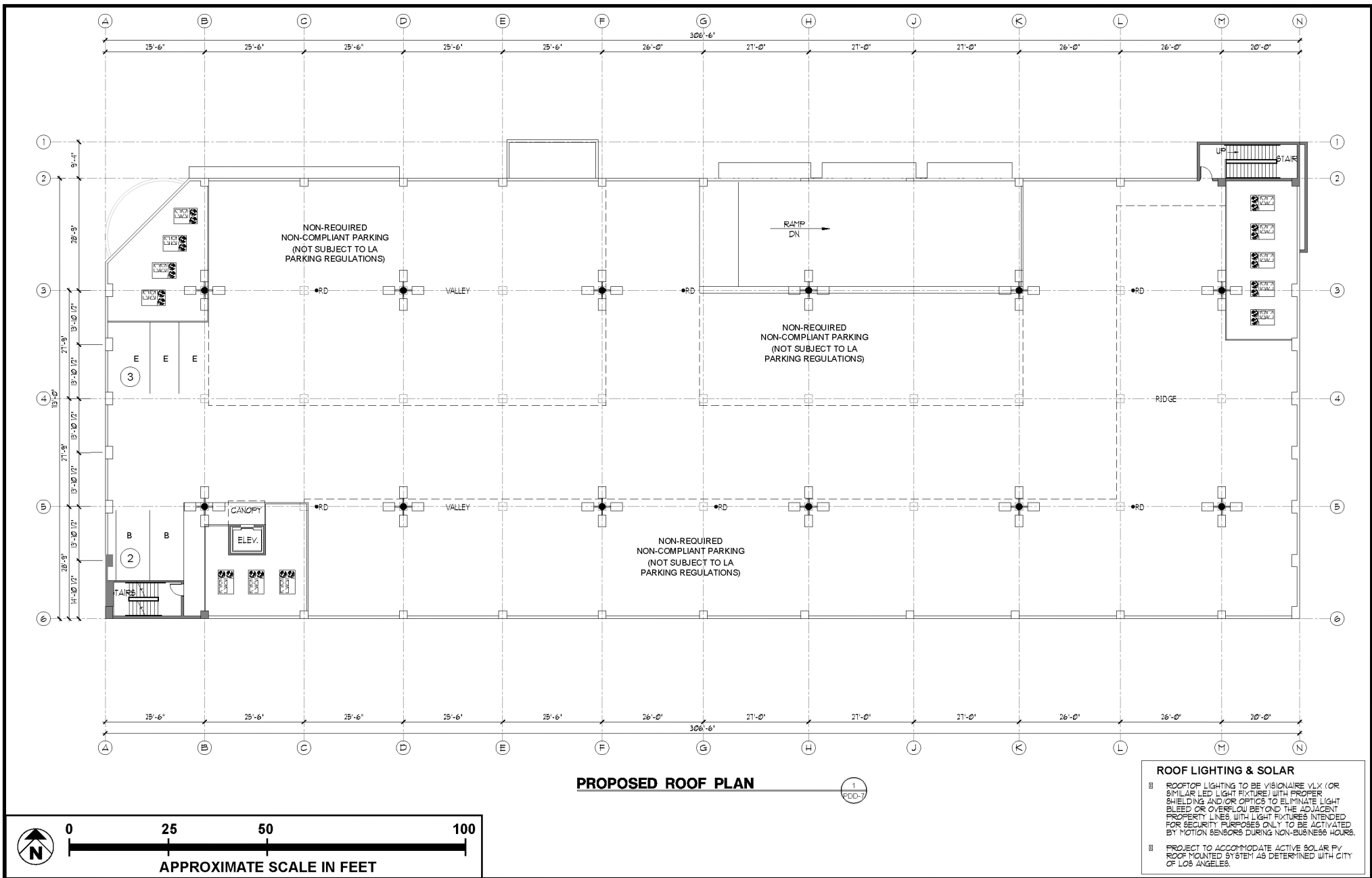


4th-Level Floor Plan—East Structure



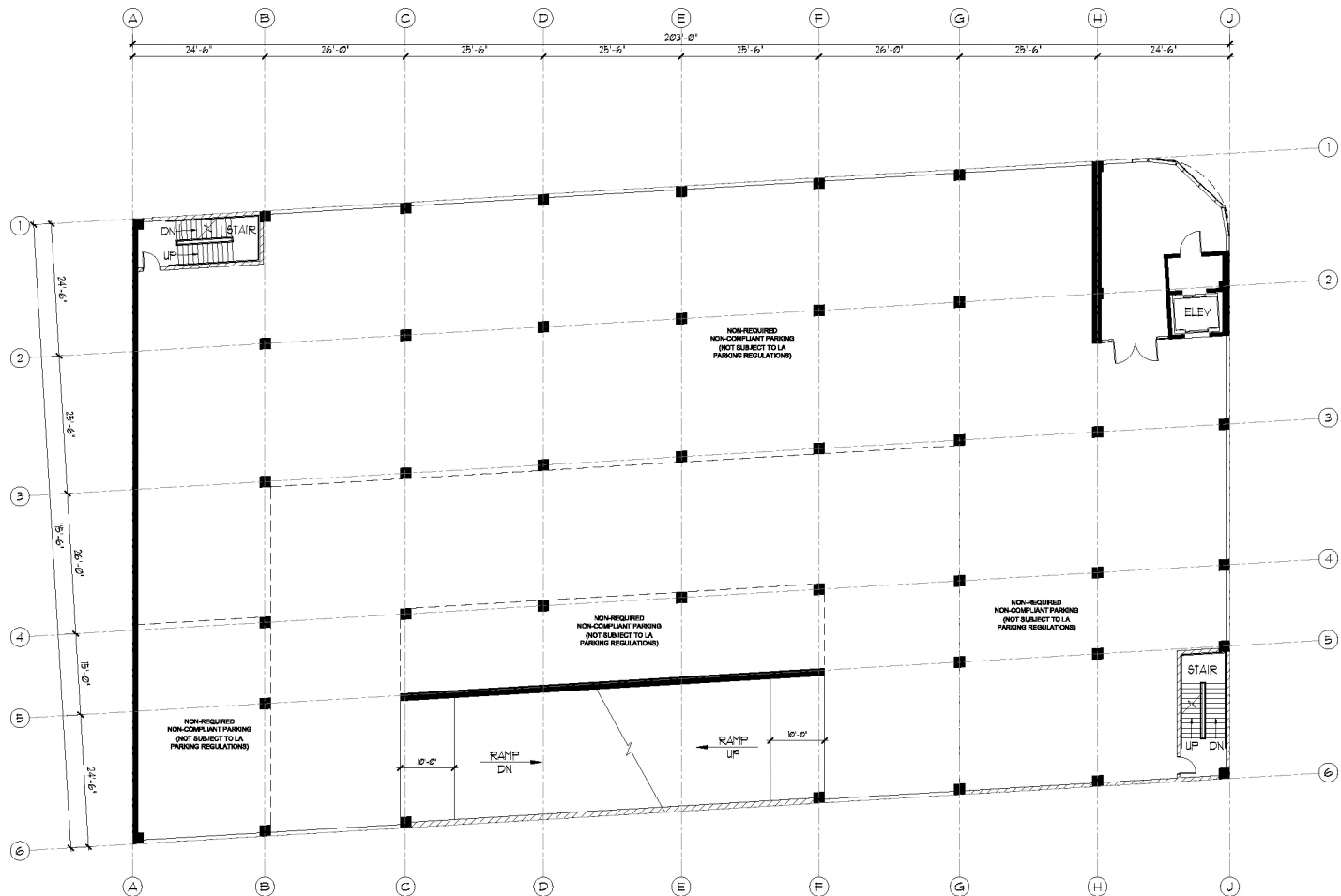
SOURCE: Wagner Architectural Group - May 2016

FIGURE 3.0-6



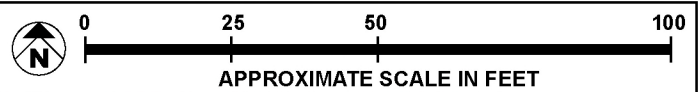
SOURCE: Wagner Architectural Group - May 2016

FIGURE 3.0-7



PROPOSED 2ND - 5TH LEVEL FLOOR PLAN 1
PDP-2

NOTE:
SLOPE OF RAMPS AND LOCATION OF
SOME ARCHITECTURAL ELEMENTS
MAY VARY FROM FLOOR TO FLOOR.
SEE ELEVATIONS AND SECTIONS.

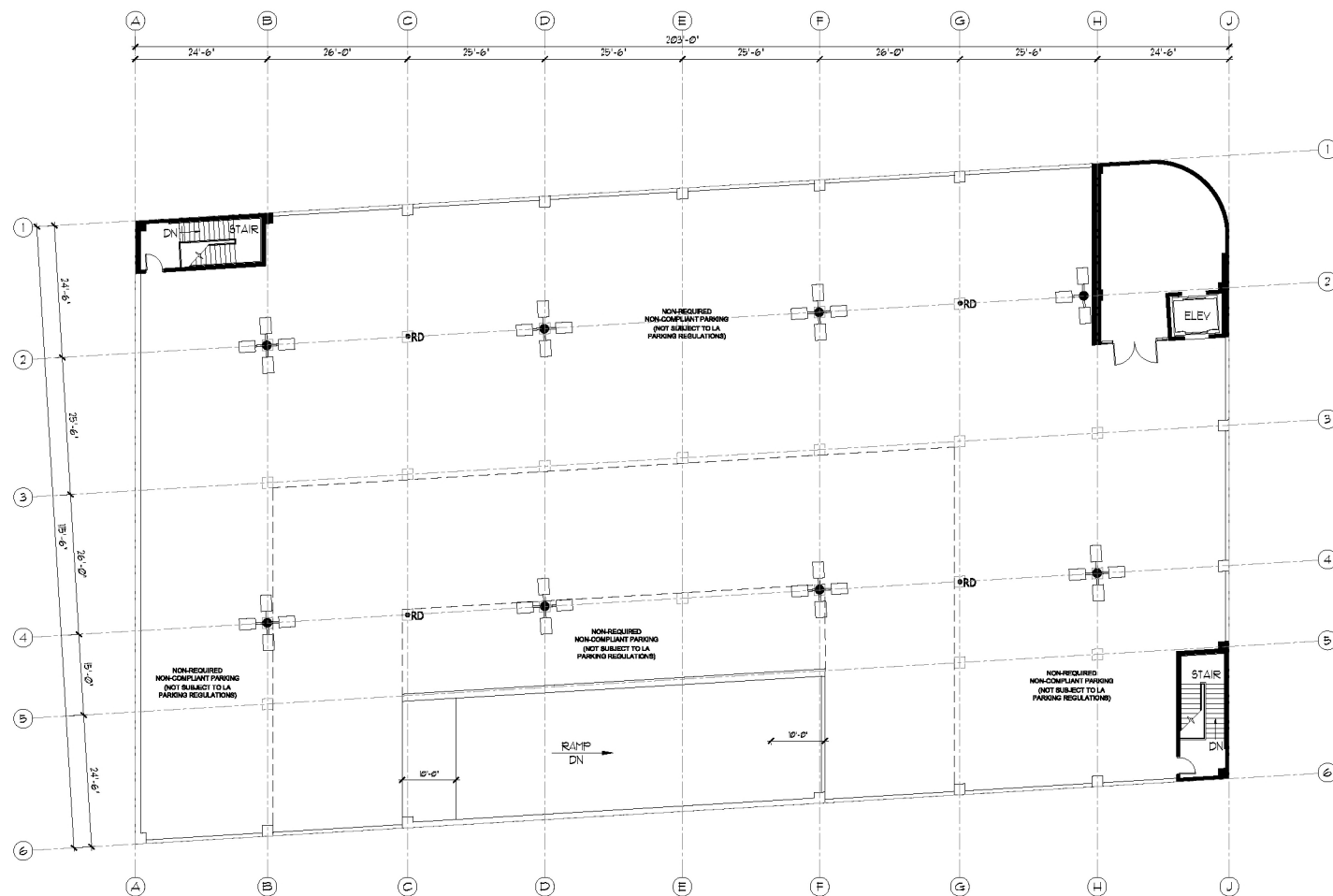


SOURCE: Wagner Architectural Group - May 2016

FIGURE 3.0-10



2nd-5th-Level Floor Plan—West Structure



NOTE:
SLOPE OF RAMPS AND LOCATION OF
SOME ARCHITECTURAL ELEMENTS
MAY VARY FROM FLOOR TO FLOOR.
SEE ELEVATIONS AND SECTIONS.

PROPOSED ROOF PLAN

1
PDP-3

SOURCE: Wagner Architectural Group - May 2016

FIGURE 3.0-11

4.0 ENVIRONMENTAL ANALYSIS

INTRODUCTION

This section of the Initial Study contains an assessment and discussion of impacts associated with the environmental issues and subject areas identified in the Initial Study Checklist Appendix G to the State CEQA Guidelines (California Code of Regulations, Title 14, Chapter 3, Sections 15000–15387). The thresholds of significance are based on the Los Angeles (LA) *CEQA Thresholds Guide*.

		Potentially Significant Impact	Potentially Significant Impact unless Mitigation Incorporated	Less than Significant Impact	No Impact
PLEASE NOTE THAT EACH AND EVERY RESPONSE IN THE CITY OF LOS ANGELES INITIAL STUDY AND CHECKLIST IS SUMMARIZED FROM AND BASED UPON THE ENVIRONMENTAL ANALYSIS CONTAINED IN ATTACHMENT B, EXPLANATION OF CHECKLIST DETERMINATIONS. PLEASE REFER TO THE APPLICABLE RESPONSE IN ATTACHMENT B FOR A DETAILED DISCUSSION OF CHECKLIST DETERMINATIONS.					
4.1 AESTHETICS					
<i>Would the project:</i>					
a.	Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b.	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a city-designated scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c.	Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d.	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4.2 AGRICULTURE AND FOREST RESOURCES					
<i>Would the project:</i>					
a.	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b.	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c.	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 1220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

		Potentially Significant Impact	Potentially Significant Impact unless Mitigation Incorporated	Less than Significant Impact	No Impact
	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4.3 AIR QUALITY					
<i>Would the project:</i>					
a.	Conflict with or obstruct implementation of the SCAQMD or congestion management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c.	Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d.	Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e.	Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4.4 BIOLOGICAL RESOURCES					
<i>Would the project:</i>					
a.	Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

		Potentially Significant Impact	Potentially Significant Impact unless Mitigation Incorporated	Less than Significant Impact	No Impact
	The California Department of Fish and Game or U.S. Fish and Wildlife Service?				
b.	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the city or regional plans, policies, regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c.	Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e.	Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4.5 CULTURAL RESOURCES					
<i>Would the project:</i>					
a.	Cause a substantial adverse change in significance of a historical resource as defined in State CEQA Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

		Potentially Significant Impact	Potentially Significant Impact unless Mitigation Incorporated	Less than Significant Impact	No Impact
b.	Cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d.	Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

4.6 GEOLOGY AND SOILS

Would the project:

a.	Expose people or structures to 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.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii.	Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii.	Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv.	Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b.	Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d.	Be located on expansive soil, as defined in table 18-1-b of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

		Potentially Significant Impact	Potentially Significant Impact unless Mitigation Incorporated	Less than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4.7 GREENHOUSE GAS EMISSIONS					
<i>Would the project:</i>					
a.	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b.	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4.8 HAZARDS AND HAZARDOUS MATERIALS					
<i>Would the project:</i>					
a.	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d.	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

		Potentially Significant Impact	Potentially Significant Impact unless Mitigation Incorporated	Less than Significant Impact	No Impact
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 for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f.	For a project within the vicinity of a private airstrip, would the project result in a safety hazard for the people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g.	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h.	Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4.9 HYDROLOGY AND WATER QUALITY					
<i>Would the project:</i>					
a.	Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

		Potentially Significant Impact	Potentially Significant Impact unless Mitigation Incorporated	Less than Significant Impact	No Impact
	river, in a manner which would result in substantial erosion or siltation on or offsite?				
d.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or offsite?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e.	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f.	Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g.	Place housing within a 100-year flood plain as mapped on federal flood hazard boundary or flood insurance rate map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h.	Place within a 100-year flood plain structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i.	Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
j.	Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4.10 LAND USE AND PLANNING					
<i>Would the project:</i>					
a.	Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b.	Conflict with applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, coastal program, or zoning ordinance) adopted for	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

		Potentially Significant Impact	Potentially Significant Impact unless Mitigation Incorporated	Less than Significant Impact	No Impact
	the purpose of avoiding or mitigating an environmental effect?				
c.	Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4.11 MINERAL RESOURCES					
<i>Would the project:</i>					
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4.12 NOISE					
<i>Would the project:</i>					
a.	Exposure of persons to or generation of noise in level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b.	Exposure of people to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c.	A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d.	A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

		Potentially Significant Impact	Potentially Significant Impact unless Mitigation Incorporated	Less than Significant Impact	No Impact
	expose people residing or working in the project area to excessive noise levels?				
f.	For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4.13 POPULATION AND HOUSING					
<i>Would the project:</i>					
a.	Induce substantial 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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b.	Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c.	Displace substantial numbers of people necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4.14 PUBLIC SERVICES					
<i>Would the project:</i>					
a.	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:				
	i. Fire protection?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	ii. Police protection?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	iii. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	iv. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

		Potentially Significant Impact	Potentially Significant Impact unless Mitigation Incorporated	Less than Significant Impact	No Impact
	v. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4.15 RECREATION					
<i>Would the project:</i>					
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4.16 TRANSPORTATION AND TRAFFIC					
<i>Would the project:</i>					
a.	Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths and mass transit?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b.	Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	Result in a change in air traffic patterns, including either an increase in traffic levels	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

		Potentially Significant Impact	Potentially Significant Impact unless Mitigation Incorporated	Less than Significant Impact	No Impact
	or a change in location that results in substantial safety risks?				
d.	Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e.	Result in inadequate emergency access?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f.	Conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4.17 UTILITIES & SERVICE SYSTEMS					
<i>Would the project:</i>					
a.	Exceed wastewater treatment requirements of the applicable regional water quality control board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b.	Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d.	Have sufficient water supplies available to serve the project from existing entitlements and resource, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e.	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

		Potentially Significant Impact	Potentially Significant Impact unless Mitigation Incorporated	Less than Significant Impact	No Impact
f.	Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g.	Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4.18 MANDATORY FINDINGS OF SIGNIFICANCE					
a.	Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, 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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b.	Does the project have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c.	Does the project have environmental effects which cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

DISCUSSION OF THE ENVIRONMENTAL EVALUATION

The environmental analyses presented herein include the use of official City and other government source reference materials related to various environmental impact categories (e.g., Hydrology, Air Quality, Biology, Cultural Resources, etc.). Based on Applicant information provided in the Master Land Use Application and Environmental Assessment Form, impact evaluations are based on the stated facts contained therein, including but not limited to the reference materials identified herein, field investigations of the proposed project site, and other relevant reference materials. Both the Initial Study Checklist and Checklist Explanations, in conjunction with the City’s Adopted Thresholds Guide and CEQA Guidelines, were used to reach reasonable conclusions on environmental impacts as mandated under the California Environmental Quality Act (“CEQA”).

ADDITIONAL INFORMATION

All supporting documents and references are contained in the Environmental Case File referenced previously and may be viewed in the Environmental Analysis Section, Room 750, City Hall.

For City information, addresses, and phone numbers, visit the City’s website at <http://www.lacity.org>; City Planning and Zoning Information Mapping Automated System (“ZIMAS”) cityplanning.lacity.org/; Environmental Analysis Section, City Hall, 200 North Spring Street, Room 750; Seismic Hazard Maps, http://gmw.consrv.ca.gov/shmp/download/quad/BEVERLY_HILLS/reports/bevh_eval.pdf; Parcel Information, http://navigatela.lacity.org/common/mapgallery/pdf/landbase_bw/index/landbase_Index_11.pdf; or the City’s main website under the heading “Navigate LA.”

PREPARED BY: Meridian Consultants	TITLE: Tony Locacciato	TELEPHONE NO.: 805-367-5720	DATE: March 24, 2016
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ENVIRONMENTAL DISCUSSION AND ANALYSIS

4.1 AESTHETICS

Impact Analysis

Senate Bill (SB) 743, effective January 1, 2014, deems the aesthetic impacts of residential, mixed-use residential, or employment center projects located in defined transit priority areas as less than significant under CEQA. Zoning Information File (ZI) No. 2451 issued by the Planning Department includes a corresponding map of Transit Priority Areas (TPAs), which identifies the proposed project site as within a TPA. Therefore, any aesthetic impacts, including but not limited to (a) adverse effects on scenic vistas, (b) damage to scenic resources, (c) degradation of existing visual character, (d) light and/or glare, and (e) shade shadow are deemed less than significant as a matter of law. Notwithstanding the mandate imposed by SB 743, the following aesthetic analysis of the proposed project is provided for informational purposes only.

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

No Impact. Based on the *LA CEQA Thresholds Guide*, a significant impact could occur for a non-SB 743 project if a project introduces incompatible visual elements within a field of view containing a scenic vista or substantially blocks views of a scenic vista. Scenic vistas generally are either panoramic views (visual access to a large geographic area, for which the field of view can be wide and extend into the distance) or focal views (visual access to a particular object, scene, or feature of interest).

The proposed project site is located within the South Los Angeles Community Plan (the “Community Plan”) area. The South Los Angeles Community Plan Map (the “Community Plan Map”) does not identify any scenic vistas or other significant visual corridors at or across the proposed project site.³⁷ The Interstate 110 is a major transportation route that provides panoramic views of the area. The portion of the 110 north of MLK Blvd. is elevated and provides scenic vistas to the north and west of downtown Los Angeles, the San Gabriel Mountains, the Hollywood Hills, and Exposition Park. The proposed project site is not within these scenic vistas and the proposed project would not be visually prominent from the freeway north of MLK Blvd. Furthermore, the proposed project site is located in a relatively level, urbanized portion of Los Angeles. As shown in **Figures 2.0-4 and 2.0.5, Existing Conditions**, views from around the site are generally obstructed by other buildings or trees. Views near the proposed project site are largely constrained by adjacent structures and the area’s relatively flat topography. No scenic views are provided from or through the proposed project site. The proposed project would alter the existing views and character of the proposed project site and immediately surrounding area in a positive manner that is

37 City of Los Angeles, Department of City Planning, *South Los Angeles Community Plan* (revised March 22, 2000).

compatible with the urban form of the South Los Angeles area. As such, no vistas are visible from or across the site. Furthermore, pursuant to Section 21099(d)(1) of the California Public Resources Code (PRC), the proposed project proposes a new commercial use located on an infill site within a transit priority area. As such, aesthetic impacts shall not be considered a significant impact on the environment. Therefore, no impacts to scenic vistas would occur.

Mitigation Measures: No mitigation measures are necessary.

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

No Impact. Based on the LA *CEQA Thresholds Guide*, a significant impact could occur for a non-SB 743 project if scenic resources would be damaged and/or removed by development of a project. The proposed project site is currently utilized for surface parking, a small-scale commercial building, and signage including billboards. The proposed project site is not located within or along a designated scenic highway, and no scenic views exist from or through the currently developed site. The nearest designated State scenic highway is State Route (SR) 2, which runs from 2.7 miles north of SR 210 at La Cañada to the San Bernardino County line.³⁸ The existing commercial structure does not meet the criteria to be eligible for the National Register of Historic Places, the California Register of Historical Resources, or as a City Historic-Cultural Landmark based on the LA *CEQA Thresholds Guide* and the discussion in **Section 4.5, Cultural Resources**. Minimal ornamental landscaping exists on the MLK Blvd. parkway and north and south of the site. By extension, there are no natural scenic resources, such as native California trees or unique geologic features, on the proposed project site. Furthermore, the proposed project site is located just south of the Los Angeles Memorial Coliseum (the “Coliseum”), a designated National Historic Landmark, and immediately adjacent to the north and east of the Exposition Park Square Historic District, which is identified by the City as eligible for historic district designation (refer to discussion in **Section 4.5, Cultural Resources**). Implementation of the proposed project would not damage or obstruct any existing views of these historic resources. Furthermore, pursuant to Section 21099(d)(1) of the California Public Resources Code (PRC), the proposed project proposes a new commercial use located on an infill site within a transit priority area. As such, aesthetic impacts shall not be considered a significant impact on the environment. Therefore, no impacts to scenic resources would occur.

Mitigation Measures: No mitigation measures are necessary.

³⁸ California Department of Transportation, “Officially Designated State Scenic Highways” (October 2013) http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/.

c. *Would the project substantially degrade the existing visual character or quality of the site and its surroundings?*

No Impact. Based on the LA CEQA Thresholds Guide, a significant impact would occur for a non-SB 743 project, if a proposed project were to introduce incompatible visual elements on the proposed project site or visual elements that would be incompatible with the character of the area surrounding the proposed project site. Pursuant to Section 21099(d)(1) of the California Public Resources Code (PRC), the proposed project proposes a new commercial use located on an infill site within a transit priority area. As such, aesthetic impacts shall not be considered a significant impact on the environment.

Building Heights and Massing

Within the South Los Angeles area, there are commercial, medium to medium-high residential, and public facility land uses of various heights. Buildings close to the proposed project site range from one to four stories in height. The proposed structures on the southwest and southeast corners of MLK Blvd. and Hoover St. would be five stories, six levels in height. The West Structure and East Structure would be approximately 54 feet and 68 feet in height, with an additional approximately 10 to 12 feet to account for elevator shafts, rooftop lights and equipment, respectively.

The proposed project site is zoned C2-1 and R3-1, as shown in **Figure 2.0-7, Zoning Map**. The height restriction for buildings within R3-1 zoning designations is 45 feet. There is no height restriction for buildings within the C2-1 zoning designation. The Applicant is requesting a Zone Change and Height District Change for the proposed project site from C2-1 and R3-1 to C2-2. This Zone Change and Height District Change would permit the five-story, approximately 68-foot-high East Structure, with an additional approximately 10 feet to account for elevator shafts, rooftop lights and equipment, and would ensure compatibility with existing zoning and surrounding buildings. This Zone Change and Height District Change would permit the five-story, approximately 54-foot high West Structure, with an additional approximately 12 feet to account for elevator shafts, rooftop lights and equipment, and would ensure compatibility with existing zoning and surrounding buildings. As such, the proposed project's height requirements would not conflict with any LAMC height restrictions. The proposed project's impacts with respect to building height and massing would not be significant.

Views

Development of the proposed project would obstruct views across the site; however, at a height of five stories, the proposed project would not become a prominent part of the existing skyline. Although the East Structure and West Structure may be visible from private viewpoints within the residential buildings within the surrounding area, it should be noted that private views are not protected by any viewshed protection ordinance, and the alteration of private views would not constitute a significant impact. The

visual impact of one building blocking another building is not considered a significant impact, as the general characteristics of the urban setting would not be altered. As such, the proposed project's impact upon obstruction of scenic public views would not be significant.

Vandalism

The proposed project would alter the visual character of the site. However, the existing parking lots and commercial building are not of high visual quality and the new structures would include façade elements of visual interest. While it is possible that trash, debris and graffiti could adversely affect the visual character of the proposed structures, pursuant to LAMC Section 91.8104 every building, structure, or portion thereof is required to be maintained free from debris, rubbish, garbage, trash, overgrown vegetation, or other similar material and pursuant to LAMC Section 91.9104.15 the exterior of all buildings and fences shall be free from graffiti when such graffiti is visible from a street or alley.

Regulatory Compliance Measure RC-AE-3 (Vandalism): The proposed project shall comply with all applicable building code requirements, including the following:

- Every building, structure, or portion thereof shall be maintained in a safe and sanitary condition and good repair, and free from debris, rubbish, garbage, trash, overgrown vegetation, or other similar material, pursuant to Municipal Code Section 91.8104.
- The exterior of all buildings and fences shall be free from graffiti when such graffiti is visible from a street or alley, pursuant to Municipal Code Section 91.8104.15.

No significant impacts would occur with implementation of Regulatory Compliance Measure RC-AE-3. As such, the proposed project would not degrade the existing visual character of the proposed project site.

Shade and Shadow

Shade and shadow impacts occur if obstruction of sunlight affects adjacent properties. Shading is an important environmental issue to users or occupants of certain land uses that have some reasonable expectations for direct sunlight and warmth from the sun. Per the *LA CEQA Thresholds Guide*, shadow sensitive uses include "routinely useable outdoor spaces associated with residential, recreational, or institutional (e.g., schools, convalescent homes) land uses; commercial uses such as pedestrian oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; and existing solar collectors." Based on the *LA CEQA Thresholds Guide*, a shading impact could be significant if a project's structures cast shadows on sensitive uses for more than three hours each day between the hours of 9:00 AM and 3:00 PM during winter months, or for more than four hours each day between the hours of 9:00 AM and 5:00 PM during the summer months.

The existing buildings to the west and east generate shade/shadow patterns onto the adjacent buildings. The West Structure and East Structure would be approximately 54 feet and 68 feet in height, with an additional approximately 12 to 10 feet to account for elevator shafts, rooftop lights and equipment, respectively. Based on a survey of the buildings within the potential shadow envelope of the proposed project, shade-sensitive land uses were identified within the projected shadow patterns to the immediate west and east of the proposed project site. During both the winter and summer months, West Structure and East Structure would primarily cast shadows on the adjacent residences to the west in the morning and the adjacent residences to the east in the evening. As shown in **Figure 4.1-1a, Seasonal Shadows**, the proposed project's winter solstice shadows would not regularly shade surrounding structures for more than three hours between 9:00 AM to 3:00 PM. As shown in **Figure 4.1-1b, Seasonal Shadows**, the proposed project's spring/fall and summer solstice shadows would not regularly shade surrounding structures for more than four hours between 9:00 AM and 5:00 PM. Shadows would not affect these residences throughout the rest of the day. Since these properties do not have any routinely useable outdoor areas or balconies and would not be shaded regularly for more than four hours during the summer and three hours during the winter, impacts would be less than significant.

Additionally, the proposed project would be visually compatible with the surrounding neighborhood, and would be consistent with several other multifamily residential, commercial and recreational developments in the South Los Angeles area. As such, the proposed project would not continually shade useable outdoor spaces. No significant impacts would occur.

Mitigation Measures: No mitigation measures are necessary.

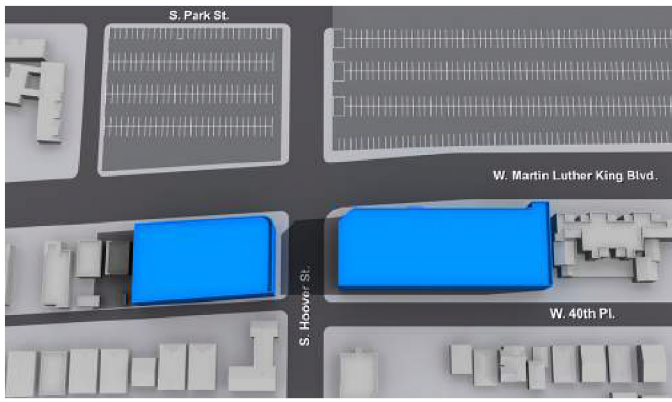
d. Would the project create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

No Impact. A significant impact may occur for a non-SB 743 project, if a project introduces new sources of light or glare on or from a project site that would be incompatible with the areas surrounding a project site, or that pose a safety hazard to motorists utilizing adjacent streets or freeways. Based on the LA CEQA *Thresholds Guide*, the determination of whether a project results in a significant nighttime illumination impact shall be made considering the following factors: (a) the change in ambient illumination levels as a result of project sources; and (b) the extent to which project lighting would spill off the project site and affect adjacent light-sensitive areas. Pursuant to Section 21099(d)(1) of the California Public Resources Code (PRC), the proposed project proposes a new commercial use located on an infill site within a transit priority area. As such, aesthetic impacts shall not be considered a significant impact on the environment.

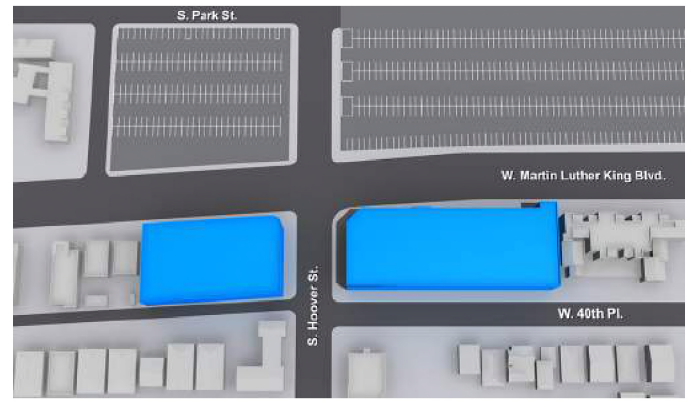
Light

The proposed project site currently features pole-mounted flood lights and illuminated signs. The proposed project would feature lighting typical of commercial uses and parking structures. Night lighting for the proposed project could include Visionaire VLX (or similar LED light fixture) with proper shielding and/or optics to eliminate light bleed or overflow beyond the adjacent property lines, with light fixtures intended for security purposes only to be activated by motion sensor during non-business hours. The proposed project would accommodate active solar PV roof mounted system as determined by the City. The existing lighting would be removed. The East Structure would include internally illuminated brand letter set, brand logo, and channel letter signage; a 318-square-foot digital display; and a 1,962-square-foot non-illuminated graphic panel (brand related) along MLK Blvd. The East Structure would include internally illuminated grand letter set and brand logo signage and a digital display along Hoover St. Finally, internally illuminated brand letter set, channel letter set, cabinet signage, and non-illuminated public art signage would be located along 40th Place. All illuminated and non-illuminated signs would be designed in accordance with Ordinances 179,416, 180,841, and 182,706 of the Los Angeles Municipal Code (Section 14.4). Therefore, all signage would not interfere with traffic safety or otherwise endanger public safety and would not dominate the visual appearance of the area. The West Structure would not include illuminated signage along any side of the structure to minimize the spill light from luminaires within the structure from reaching beyond the proposed project site. In addition to the exterior ground-level nighttime security lighting, interior lighting, and roof lights, as previously discussed including LED light fixtures with proper shielding to eliminate offsite light beyond the adjacent property lines, on both structures associated with the proposed project would provide an additional source of nighttime illumination. Due to its close proximity to surrounding residential and commercial buildings, the proposed project would utilize outdoor lighting designed and installed with shielding to reduce light source impacts surrounding the proposed project site, such as adjacent residential properties or the public right-of-way. The expected change in illumination that could spill off the proposed project site is not expected to be substantial. No significant impacts would occur.

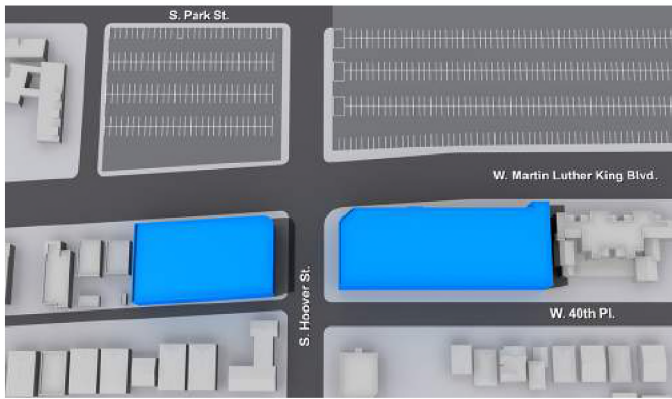
SUMMER SOLSTICE



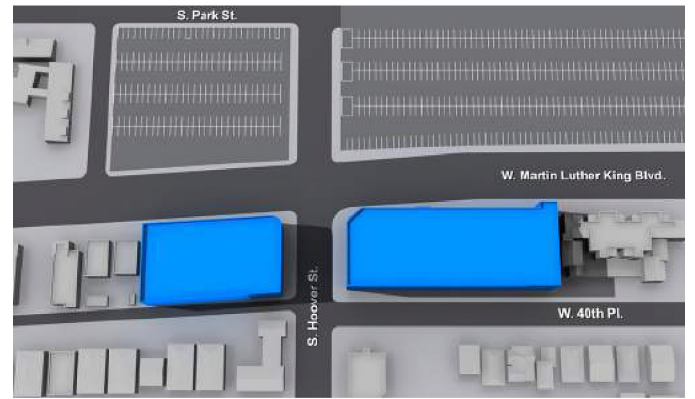
9:00 AM



12:00 PM

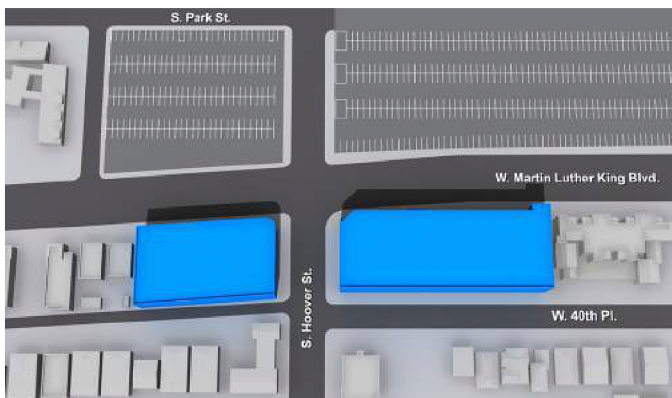


3:00 PM

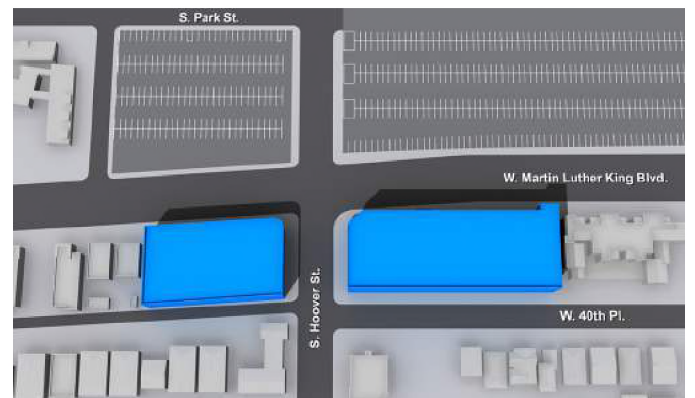


5:00 PM

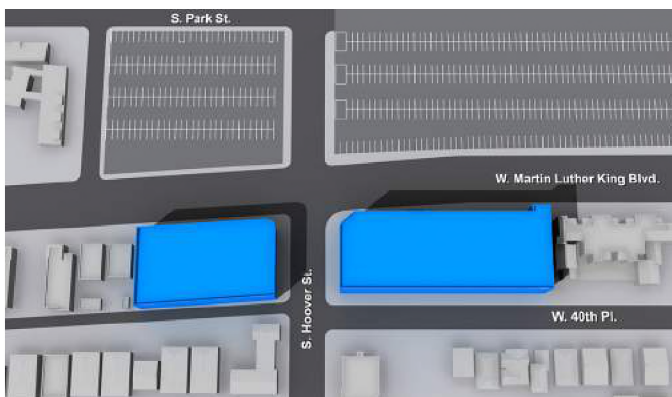
SPRING/FALL EQUINOX



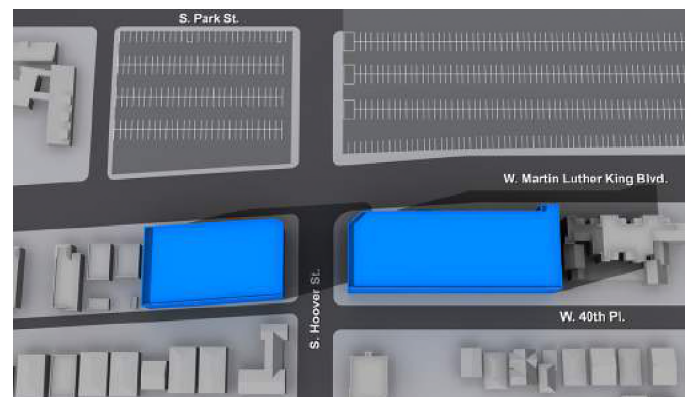
1:00 PM



2:00 PM



3:00 PM

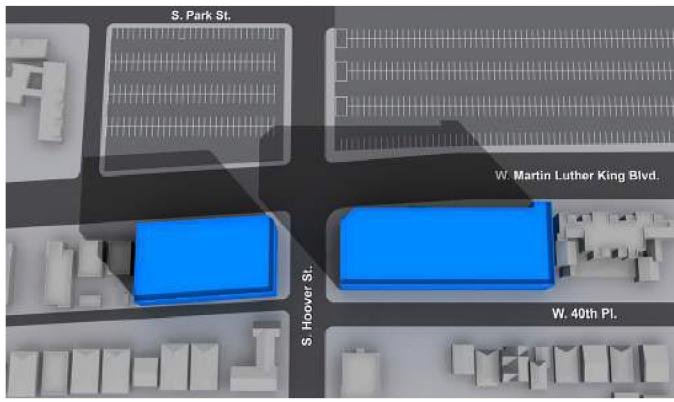


5:00 PM

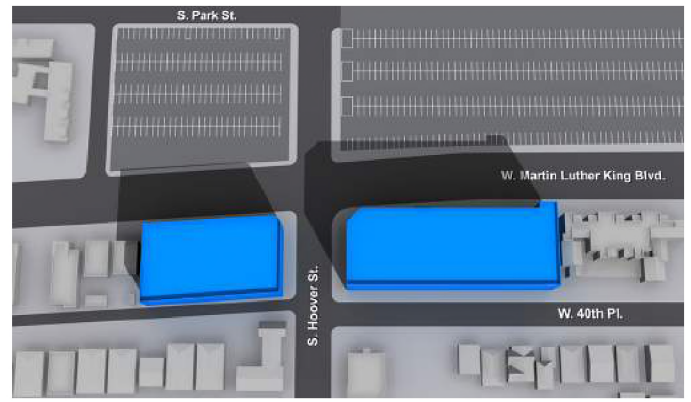
SOURCE: Paul Manzer Graphic Design - 2016

FIGURE 4.1-1a

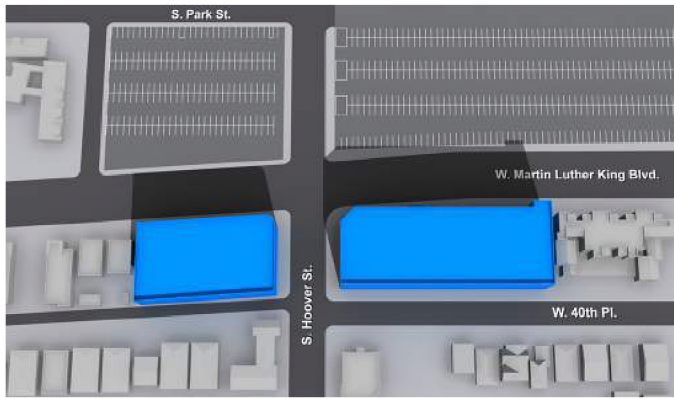
WINTER SOLSTICE



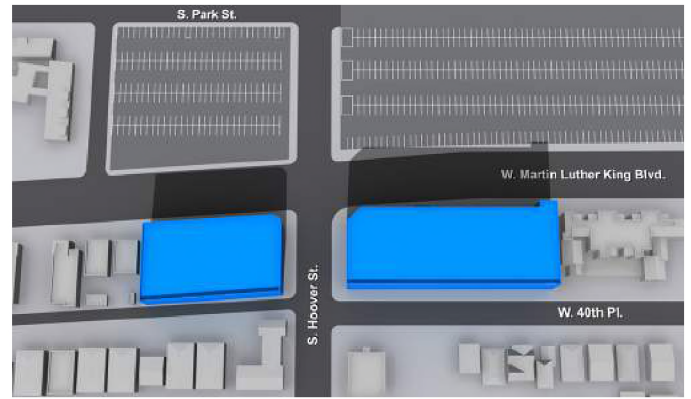
9:00 AM



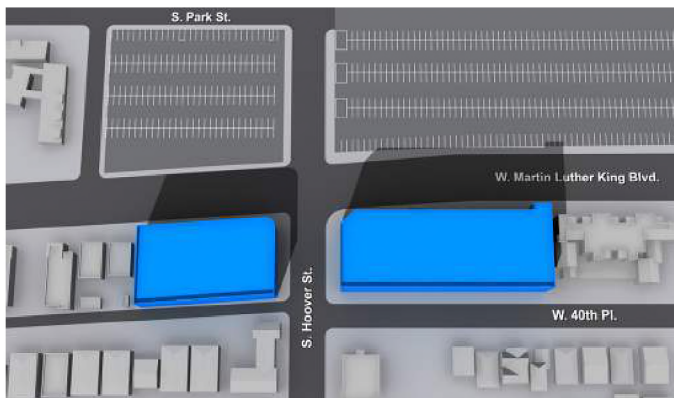
10:00 AM



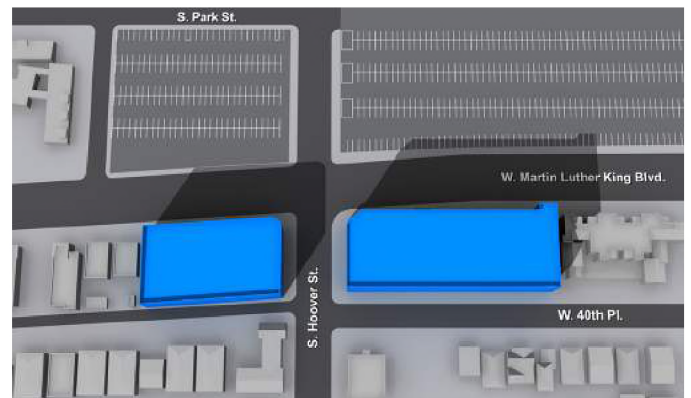
11:00 AM



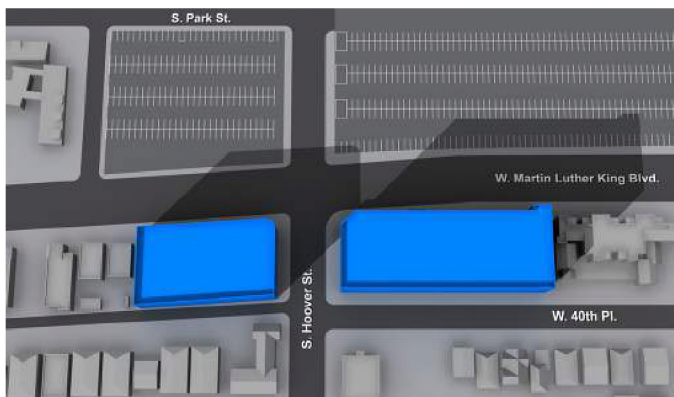
12:00 PM



1:00 PM



2:00 PM



3:00 PM

SOURCE: Paul Manzer Graphic Design - 2016

FIGURE 4.1-1b

Glare

Potential reflective surfaces in the proposed project vicinity include automobiles traveling along roadways and parked on streets, exterior building windows, and surfaces of brightly painted buildings. Excessive glare not only restricts visibility, but also increases the ambient heat reflectivity in a given area. The proposed project's architectural materials would generally include a mix of exposed concrete facades, aluminum metal glazed panels, louvered metal panels, and clear glass curtainwalls in select locations. Highly polished materials or highly reflective metal material and glass that could reflect light and create glare are not proposed. The proposed project would not introduce any new sources of glare that are incompatible with the surrounding areas. Additionally, the architectural materials to be used for the exterior would be limited to materials that do not cause excessive glare and reflected heat. Impacts would not be significant.

Mitigation Measures: No mitigation measures are necessary.

Cumulative Impacts

No Impact. Development of the proposed project in conjunction with the 12 related projects would result in an intensification of existing prevailing land uses in an already heavily urbanized area of Los Angeles. Development of related projects is expected to occur in accordance with adopted plans and regulations. With respect to the overall visual quality of the surrounding neighborhood, each of the related projects would be required to meet lighting requirements and submit a landscape plan and signage plan (if proposed) to the Los Angeles Department of City Planning for review and approval prior to the issuance of grading permits. As such, there would be no cumulative impacts.

Mitigation Measures: No mitigation measures are necessary.

4.2 AGRICULTURE AND FORESTRY RESOURCES

Impact Analysis

- 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. A significant impact would occur if the project would convert valued farmland to non-agricultural uses. The proposed project site is in an urban location. No farmland or other agricultural activity exists on or near the proposed project site. On maps prepared pursuant to the Farmland Mapping and Monitoring Program, the proposed project site is designated as “urban and built-up land.”³⁹ No portion of the proposed project site is designated as Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance. Therefore, the proposed project would not convert any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use, and no impacts would occur.

Mitigation Measures: No mitigation measures are necessary.

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

No Impact. A significant impact would occur if the project conflicted with existing agricultural zoning or agricultural parcels enrolled under a Williamson Act Contract. The proposed project site is located within the jurisdiction of the City and is subject to the applicable land use and zoning requirements of the LAMC. The proposed project site is currently zoned as C2 (Commercial) and R3 (Multiple Dwelling). The proposed project site is not zoned for agricultural production and no Williamson Act Contracts are in effect for the proposed project site.⁴⁰ As such, no impacts would occur.

Mitigation Measures: No mitigation measures are necessary.

39 California Department of Conservation, Division of Land Resource Protection, Los Angeles County Important Farmland 2012.

40 California Department of Conservation, Division of Land Resource Protection, Los Angeles County Williamson Act FY 2012/2013.

- 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. A significant impact would occur if the project conflicted with existing zoning for, or caused rezoning of forest land or timberland or result in the loss of forest land or in the conversion of forest land to non-forest use. The proposed project site is currently zoned as C2 (Commercial) and R3 (Multiple Dwelling). The proposed project site is not zoned for agricultural production, forestland or timberland. No impacts would occur.

Mitigation Measures: No mitigation measures are necessary.

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

No Impact. A significant impact would occur if the proposed project conflicted with existing zoning for, or caused rezoning of forest land or timberland or result in the loss of forest land or in the conversion of forest land to non-forest use. The proposed project site is occupied by surface parking, a commercial building, and billboard structures. Minimal ornamental landscaping exists on MLK Blvd. adjacent to the proposed project site. No designated forested lands exist on or near the proposed project site. No impacts would occur.

Mitigation Measures: No mitigation measures are necessary.

- 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?***

No Impact. A significant impact would occur if the project caused the conversion of farmland to non-agricultural use or Forest Land to Non-Forest Use. Neither the proposed project site, nor nearby properties, are currently utilized for agricultural or forestry uses. The proposed project site is not classified in any "Farmland" category designated by the State of California or the City. No impacts would occur.

Mitigation Measures: No mitigation measures are necessary.

Cumulative Impacts

No Impact. Development of the proposed project, in combination with the identified related projects, would not result in the conversion of State-designated agricultural land from agricultural use to a nonagricultural use, nor result in the loss of forest land or conversion of forest land to nonforest use. The proposed project site is located in an urbanized area in the City and is not in proximity to any agricultural lands or forest uses. No impacts would occur.

Mitigation Measures: No mitigation measures are necessary.

4.3. AIR QUALITY

Impact Analysis

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

Less than Significant Impact. Based on the LA CEQA Thresholds Guide, a significant air quality impact could occur if the proposed project is not consistent with the applicable Air Quality Management Plan (“AQMP”) or would substantially hinder implementing the policies or achieving the goals of that plan. The most recent AQMP was adopted by the Governing Board of the South Coast Air Quality Management District (“SCAQMD”) in 2012. The South Coast Air Basin (Basin) is currently in nonattainment for the following criteria pollutants: ozone (“O₃”), particulate matter (“PM₁₀”), and fine particulate matter (“PM_{2.5}”). If a project exceeds the regional air pollutant thresholds, then it would significantly contribute to air quality violations in the Basin. Projects that are consistent with the projections of employment and population forecasts identified in the Growth Management Chapter of the Southern California Association of Governments Regional Comprehensive Plan (“RCP”) are considered consistent with the AQMP growth projections because the Growth Management Chapter forms the basis of the land use and transportation control portions of the AQMP. As discussed in **Section 4.13, Population and Housing**, the proposed project is consistent with the RCP growth projections. Thus, the proposed project is considered consistent with the AQMP and impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

b. *Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?*

Potentially Significant Unless Mitigation Incorporated. Based on the LA CEQA Thresholds Guide, a project could have a significant impact if project-related emissions exceed Federal, State, or regional standards or thresholds, or project-related emissions substantially contribute to an existing or projected air quality violation. SCAQMD has developed regional emissions thresholds that are used to determine whether or not a project would contribute to air pollutant violations. If a project exceeds the regional air pollutant thresholds, then it would significantly contribute to air quality violations in the Basin.

Construction Emissions

Construction activities would create emissions of dusts, fumes, vehicle and equipment exhaust, and other air contaminants. The amount of emissions generated on a daily basis would vary, depending on the type and intensity of construction activities occurring. It is expected that all construction activities would conform with industry standards, City regulations and SCAQMD rules.

An analysis of daily construction emissions was prepared utilizing the California Emissions Estimator Model (“CalEEMod”) recommended by the SCAQMD (See **Appendix A**). These calculations assume legal compliance and that code-required dust control measures would be implemented during each phase of construction. Control requirements for SCAQMD Rule 403—Fugitive Dust include but are not limited to applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel-washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the proposed project site, and maintaining effective cover over exposed areas. As shown in **Table 4.3-1, Maximum Emissions**, construction-related daily emissions associated with the proposed project would not exceed any regional SCAQMD significant threshold for criteria pollutants. During proposed project construction, all unpaved construction areas would be wetted at least three times daily during construction, and temporary dust covers would be used to reduce dust emissions and meet SCAQMD District Rule 403 as indicated in Regulatory Compliance Measure RC-AQ-1. Wetting would reduce fugitive dust by as much as 61 percent. The construction area would also be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind. All clearing, earthmoving, or excavation activities would be discontinued during period of high winds (i.e., greater than 15 mph), to prevent excessive amounts of dust. All dirt/soil materials transported off site would be either sufficiently watered or securely covered to prevent excessive amounts of dust. There would be no off-site exporting and therefore there would be no hauling routes. Regulatory Compliance Measures RC-AQ-2 and RC-AQ-3 would make sure that any vehicles would have a minimal impact to air quality.

Regulatory Compliance Measure RC-AQ-1 (Demolition, Grading, and Construction Activities):

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

- All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.
- The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.
- All clearing, earthmoving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust.
- All dirt/soil loads shall be secured by trimming, watering, or other appropriate means to prevent spillage and dust.
- All dirt/soil materials transported off site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.

- General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.
- Trucks having no current hauling activity shall not idle but be turned off.

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

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

Regulatory Compliance Measure RC-AQ-4 (Spray Painting): Compliance with provisions of the SCAQMD District Rule 403. The proposed project shall comply with all applicable rules of the Southern California Air Quality Management District, including the following:

- All spray painting shall be conducted within an SCAQMD-approved spray paint booth featuring approved ventilation and air filtration system.
- Prior to the issuance of a building permit, use of land, or change of use to permit spray painting, certification of compliance with SCAQMD air pollution regulations shall be submitted to the Department of Building and Safety.

With implementation of Regulatory Compliance Measures RC-AQ-1, RC-AQ-2, RC-AQ-3, and RC-AQ-4, and Mitigation Measures AQ-1 through AQ-4, listed below, construction emission impacts would be less than significant.

Operational Emissions

Operational emissions generated by motor vehicles would be generated by the normal activities of the proposed project. Area source emissions would be generated by the operation of the car wash, car service facilities, consumption of natural gas, and landscape maintenance. Mobile emissions would be generated by the motor vehicles traveling to and from the proposed project site. Regulatory Compliance Measure RC-AQ-5 limiting VOC content of architectural coating was incorporated into the operational emission analysis. The analysis of daily operational emissions associated with the proposed project has been prepared utilizing the CalEEMod recommended by the SCAQMD (see **Appendix A**). The results of these calculations are presented in **Table 4.3-1, Maximum Emissions**. As shown in **Table 4.3-1**, the operational emissions generated by the proposed project would not exceed the regional thresholds of significance set by the SCAQMD.

Regulatory Compliance Measure RC-AQ-5: The proposed project shall comply with South Coast Air Quality Management District Rule 1113 limiting the volatile organic compound content of architectural coatings.

Therefore, operational emissions would also not contribute a considerable increase in emissions of the pollutants for which the Basin is currently in nonattainment (O₃, PM₁₀, and PM_{2.5}). As such, with implementation of Regulatory Compliance Measure RC-AQ-5, impacts would be less than significant.

Table 4.3-1
Maximum Emissions (pounds/day)

Source	VOC	NOx	CO	SOx	PM10	PM2.5
Construction Phase Maximum	45.9	41.5	32.6	0.1	4.8	2.7
SCAQMD Construction threshold	75	100	550	150	150	55
Threshold exceeded?	NO	NO	NO	NO	NO	NO
Operational Maximum	7.2	6.8	31.7	0.1	5.1	1.4
SCAQMD Operational threshold	55	55	550	150	150	55
Threshold exceeded?	NO	NO	NO	NO	NO	NO

Notes: Refer to Modeling in Appendix A. Includes implementation of fugitive dust control measures required by SCAQMD under Rule 403. CO = carbon monoxide; NOx = nitrogen oxides; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns; VOC = volatile organic compound; SOx = sulfur oxides.

Mitigation Measures: The following mitigation measures shall be implemented to reduce impacts to a less than significant level.

MM III-90 Air Quality

Air quality impacts from project implementation due to construction-related emissions may occur. However, the potential impact may be mitigated to a less than significant level by the following measures:

AQ-1 All off-road construction equipment greater than 50 horsepower (hp) shall meet US EPA Tier 4 emission standards, where available, to reduce NO_x, PM₁₀ and PM_{2.5} emissions at the proposed project site. In addition, all construction equipment shall be outfitted with Best Available Control Technology devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

- AQ-2** Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks) and if the Lead Agency determines that 2010 model year or newer diesel trucks cannot be obtained, the Lead Agency shall require trucks that meet U.S. EPA 2007 model year NOx emissions requirements.
- AQ-3** At the time of mobilization of each applicable unit of equipment, a copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided.
- AQ-4** Encourage construction contractors to apply for SCAQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for SCAQMD "SOON" funds. The "SOON" program provides funds to accelerate cleanup of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at: <http://www.aqmd.gov/home/programs/business/business-detail?title=offroad-diesel-engines&parent=vehicle-engine-upgrades>.

c. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors)?

Potentially Significant Unless Mitigation Incorporated. Based on the *LA CEQA Thresholds Guide*, a significant impact may occur if a project would result in a considerable cumulative contribution to federal or State nonattainment pollutants. As the Basin is currently in State nonattainment for ozone, O₃, PM₁₀ and PM_{2.5}, the proposed project together with the related projects could contribute to an existing or projected air quality exceedance. With respect to determining the significance of the proposed project contribution, the SCAQMD neither recommends quantified analyses of construction and/or operational emissions from multiple development projects nor provides methodologies or thresholds of significance to be used to assess the cumulative emissions generated by multiple cumulative projects. Instead, the SCAQMD recommends that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project-specific impacts. Furthermore, SCAQMD states that if an individual development project generates less than significant construction or operational emissions, then the development project would not generate a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment.

As discussed above, with the implementation of Regulatory Compliance Measures RC-AQ-1, RC-AQ-2, RC-AQ-3, RC-AQ-4, and RC-AQ-5, in addition to Mitigation Measures MM AQ-1 through MM AQ-4, the proposed project would not generate construction or operational emissions that exceed the SCAQMD's recommended regional thresholds of significance. As such, the proposed project would not generate a cumulatively considerable increase in emissions of the pollutants for which the Basin is in nonattainment. Impacts would be less than significant with mitigation.

Mitigation Measures: Mitigation measures MM AQ-1 through MM AQ-4 shall be implemented to reduce impacts to a less than significant level.

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

Potentially Significant Unless Mitigation Incorporated. Proposed project construction activities and operations, as described above, may increase air emissions above current levels. Also, concentrations of pollutants may have the potential to impact nearby sensitive receptors. Sensitive receptors are defined as schools, residential homes, hospitals, resident care facilities, daycare centers or other facilities that may house individuals with health conditions who would be adversely impacted by changes in air quality. The proposed project is in close proximity to residential uses and the Expo Center with its recreation center, senior center and preschool, which are considered to be sensitive receptors. The SCAQMD has developed localized significance thresholds ("LSTs") that are based on the pounds of emissions per day that could be generated by a project. These LSTs, found in look-up tables in the "Final Localized Significance Threshold Methodology" document prepared by the SCAQMD,⁴¹ apply to projects that are less than or equal to five acres in size and are only applicable to the following criteria pollutants: NO_x, CO, PM₁₀, and PM_{2.5}. LSTs represent the maximum emissions from a project that would not be expected to cause or contribute to an exceedance of applicable federal or State ambient air quality standards, and are developed based on the ambient concentrations of that pollutant for each Source Receptor Area ("SRA"). LSTs are provided for each of SCAQMD's 38 SRAs at various distances from the source of emissions. The proposed project site is located within SRA 1, which covers the Central Los Angeles area. Given the proximity of these sensitive receptors to the proposed project site, the LSTs with receptors located within 81 feet (25 meters) have been used to address the potential localized air quality impacts associated with the construction-related NO_x, CO, PM₁₀, and PM_{2.5} emissions for each construction phase.

As shown in **Table 4.3-2, Localized Significance Threshold (LST) Worst-Case Emissions**, peak daily emissions generated on the proposed project site during construction would not exceed the applicable

41 South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology* (June 2003; rev. October 21, 2009).

construction LSTs for a 1.6-acre site in SRA 1 with incorporation of Regulatory Compliance Measures RC-AQ-1 through RC-AQ-4 and implementation of Mitigation Measures MM AQ-1 through MM AQ-4. As such, localized air quality impacts from construction activities to the off-site sensitive receptors would be less than significant with Regulatory Compliance Measures and Mitigation Measures.

For emissions from motor vehicles, SCAQMD suggests conducting a CO hotspot analysis for intersections where a project would worsen the Level of Service (“LOS”) to any level below C, and for any intersection rated D or worse where the project would increase the volume/capacity (“V/C”) ratio by two percent or more. As indicated in the Department of Transportation Approval Letter in **Appendix G.1**, and the *Traffic Assessment for Honda of Downtown Los Angeles* dated March 2016 (the “Traffic Study”), which may be found in **Appendix G.2**, the addition of proposed project traffic would not cause an intersection to worsen the LOS below C nor would it increase the V/C ratio by two percent or more for an intersection rated D or worse during either the AM or PM peak hour. As such, the proposed project would not have the potential to cause or contribute to an exceedance of the California 1-hour or 8-hour CO standards of 20 parts per million (ppm) or 9.0 ppm, respectively; or generate an incremental increase equal to or greater than 1.0 ppm for the California 1-hour CO standard, or 0.45 ppm for the 8-hour CO standard at any local intersection. Thus, impacts with respect to localized CO concentrations would be less than significant.

Toxic Air Contaminants (TAC)

Operation of the proposed project would involve the use of hazardous materials for automobile repair and maintenance as well as routine cleaning, building maintenance and landscaping, including motor oil; other automotive fluids such as brake fluid, transmission fluid, and hydraulic fluid. All potentially hazardous materials would be contained, stored, and used in accordance with the manufacturers’ instructions and handled in compliance with the applicable standards and regulations. Employees would be trained on the safe usage and storage of such materials. In addition, construction activities associated with the proposed project would be typical of other development projects in the City, and would be subject to the regulations and laws relating to toxic air pollutants at the regional, State, and federal levels that would protect sensitive receptors from substantial concentrations of these emissions. Therefore, with implementation of RC-AQ-6, and Mitigation Measures MM III-20 and MM III-30, listed below, impacts associated with the release of TACs would be less than significant.

Regulatory Compliance Measure RC-AQ-6: The project shall install odor-reducing equipment in accordance with South Coast Air Quality Management District Rule 1138.

**Table 4.3-2
Localized Significance Threshold (LST) Worst-Case Emissions (pounds/day)**

Source	NOx	CO	PM10	PM2.5
Construction				
Total mitigated maximum emissions	41.5	32.6	3.5	2.67
LST threshold	65.86	605.20	4.45	2.67
Threshold Exceeded?	NO	NO	NO	NO
Operational				
Area/energy emissions	0.2	0.1	0.02	0.02
LST threshold	65.86	605.20	1.78	0.89
Threshold Exceeded?	NO	NO	NO	NO

Note: CO = carbon monoxide; NO_x = nitrogen oxide; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns.

Mitigation Measures: The following mitigation measures shall be implemented to reduce impacts to a less than significant level:

MM III-20 Air Pollution (Auto Repair Garage)

Adverse impacts upon adjacent residential properties may result due to auto repair work and dust from auto repair and servicing. However, these impacts shall be mitigated to a less than significant level by the following measures:

- All auto repair work shall be conducted within enclosed buildings that have been designed with appropriate pollution controls and ventilation systems.

MM III-30 Expose Sensitive Receptors to Pollutants (Auto-Repair Garage)

Environmental impacts to adjacent residential properties may result due to air quality and dust from auto repair and servicing. However, these impacts can be mitigated to a less than significant level by requiring the following measure:

- No window or door opening shall be permitted along the sides of the buildings facing residential.

e. Create objectionable odors affecting a substantial number of people?

Less than Significant Impact. A significant impact would occur if objectionable odors would be generated that would adversely impact sensitive receptors. Odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as in sewage treatment facilities and landfills.

The proposed project includes automotive services that could generate odors. However, these activities would be full contained within an enclosed level of East Structure and potential odors would be contained from reaching substantial numbers of people. As such impacts would be less than significant.

During the construction phase, activities associated with the operation of construction equipment, the application of asphalt, and/or the application of architectural coatings and other interior and exterior finishes may produce discernible odors typical of most construction sites. Although these odors could be a source of nuisance to adjacent receptors, they are temporary and intermittent in nature. As construction-related emissions dissipate from the construction area, the odors associated with these emissions would also decrease, dilute, and become unnoticeable. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

Cumulative Impacts

Less than Significant Impact. Development of the proposed project in conjunction with the related projects would result in an increase in construction and operational emissions in an already urbanized area of the City of Los Angeles. Cumulative air quality impacts from project construction and operation, based on SCAQMD guidelines, are analyzed in a manner similar to project-specific air quality impacts. The SCAQMD recommends that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project-specific impacts. According to the SCAQMD, individual development projects that generate construction or operational emissions that exceed the SCAQMD recommended daily thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions for pollutants for which the Basin is in nonattainment. As discussed previously, because the construction-related and operational daily emissions associated with the proposed project would not exceed the SCAQMD's recommended thresholds, emissions associated with the proposed project would not be cumulatively considerable. Therefore, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

4.4 BIOLOGICAL RESOURCES

Impact Analysis

- 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 Game or US Fish and Wildlife Service?*

Potentially Significant Impact Unless Mitigation Incorporated. Based on the criteria stated in the LA CEQA *Thresholds Guide*, a project could have a significant impact on biological resources if it resulted in (a) the loss of individuals, or the reduction of existing habitat of a State- or federal-listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern; (b) the loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community; or (c) interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise or light) to a degree that may diminish the chances for long-term survival of a sensitive species.

The proposed project site does not contain any critical habitat or support 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 (“CDFW”) or US Fish and Wildlife Service (“USFWS”). The proposed project site is within an urbanized area of Los Angeles. However, nine unprotected street trees (eight *Pinus canariensis* – Canary Island Pines and one *Washingtonia robusta* – Mexican Fan Palm) bordering the proposed project site would be removed during proposed project construction as identified in the Tree Letter in **Appendix B**. Trees can provide nesting locations for birds and nesting birds are protected under the federal Migratory Bird Treaty Act (“MBTA”) and the California Department of Fish and Wildlife Code.^{42,43} As a result, the project Applicant shall comply with the mitigation measure below to ensure that no significant impacts to nesting birds would occur. It should be noted that the new trees planned along the proposed project frontage would be included as part of the proposed project’s landscaping plan and would not substantially change the functionality of the proposed project site.

Impacts would be less than significant with mitigation incorporated.

Mitigation Measures: The following mitigation measure shall be implemented to reduce impacts to a less than significant level.

⁴² United States Code, Title 33, sec. 703 et seq., see also Title 50, Code of Federal Regulations, pt. 10.

⁴³ California Department of Fish and Wildlife Code, sec. 3503.

IV-20

Habitat Modification (Nesting Native Birds, Non-Hillside or Urban Areas)

- Proposed project activities (including disturbances to native and nonnative vegetation, structures, and substrates) should take place outside of the breeding season for birds which generally runs from March 1 to August 31 (and as early as February 1 for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill (California Fish and Wildlife Code Section 86).
- If proposed project activities cannot feasibly avoid the breeding season, no earlier than 30 days prior to the disturbance of suitable nesting habitat, the Applicant shall:
 - f. Arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within properties adjacent to the proposed project site, as access to adjacent areas allows. The survey shall be conducted by a Qualified Biologist with experience in conducting breeding bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than three days prior to the initiation of clearance/construction work.
 - g. If a protected native bird is found, the Applicant shall delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species until August 31.
 - h. Alternatively, the Qualified Biologist could continue the survey in order to locate any nests. If an active nest is located, clearing and construction (within 300 feet of the nest or as determined by a qualified biological monitor) shall be postponed until the nest is vacated and juveniles have fledged, and when there is no evidence of a second attempt at nesting. The buffer zone from the nest shall be established in the field with flagging and stakes. Construction personnel shall be instructed on the sensitivity of the area.
 - i. If the Qualified Biologist determines that a narrower buffer between the construction activities and the observed active nests is warranted, the Qualified Biologist may submit a written explanation as to why (e.g., species-specific information; ambient conditions and bird's habituation to them; terrain, vegetation, and birds' lines of sight between the construction activities and the nest and foraging areas) to the City and, upon request, the CDFW. Based on the submitted information, the City, acting as the Lead Agency (and CDFW, if CDFW requests) shall comply with the buffer zone recommended in the Qualified Biologist report.

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

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 Game or U.S. Fish and Wildlife Service?*

No Impact. A significant impact would occur if any riparian habitat or natural community would be lost or destroyed as a result of urban development. The proposed project site is located with an urbanized neighborhood and is currently developed with surface parking lots, an approximately 4,175-square-foot, two-story building and three (3) billboard sign structures. No riparian habitat or other sensitive natural community is located on or near the proposed project site. Therefore, implementation of the proposed project would not result in any adverse impacts to riparian habitat or other sensitive natural communities.

Mitigation Measures: No mitigation measures are necessary.

c. *Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

No Impact. Based on the criteria established in the LA CEQA Thresholds Guide, a project would normally have a significant impact on biological resources if it could result in the alteration of an existing wetland habitat. The proposed project site is entirely developed and generally covered with impermeable surfaces, and does not contain any wetlands or natural drainage channels. The proposed project site does not have the potential to support any riparian or wetland habitat, as defined by Section 404 of the Clean Water Act. Thus, no impacts would occur.

Mitigation Measures: No mitigation measures are necessary.

- 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??**

No Impact. Based on the criteria established in the LA *CEQA Thresholds Guide*, a project would normally have a significant impact on biological resources if it could result in the interference with wildlife movement/migration corridors that may diminish the chances for long-term survival of a sensitive species. The proposed project site is located in an area that has been previously developed in a heavily urbanized area of the City. Due to the highly urbanized surroundings, there are no wildlife corridors or native wildlife nursery sites in the proposed project vicinity. Thus, no impacts would occur.

Mitigation Measures: No mitigation measures are necessary.

- e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?**

Potentially Significant Impact unless Mitigation Incorporated. Based on the criteria established in the LA *CEQA Thresholds Guide*, a project-related, significant adverse effect could occur if a project were to cause an impact that is inconsistent with local regulations pertaining to biological resources, such as the City of Los Angeles Protected Tree Ordinance.⁴⁴ The proposed project site is located within an urbanized neighborhood and is currently developed with surface parking lots, an approximately 4,175-square-foot, two-story building and three (3) billboard sign structures. As stated before, approximately nine street trees bordering the site (eight *Pinus canariensis* – Canary Island Pines and one *Washingtonia robusta* – Mexican Fan Palm) within the public right-of-way may be removed, trimmed, or otherwise disturbed during construction as identified in the Tree Letter in **Appendix B**. These street trees do not consist of any tree species protected under the Los Angeles Protected Tree Ordinance (i.e., Valley oak, California live oak, Southern California black walnut, Western sycamore, or California bay). The Mexican Fan Palm is currently adjacent to the existing commercial building on the southeast corner of MLK Blvd./Hoover St. intersection and would be removed as it located immediately adjacent to the existing building. One of the Canary Island Pines is located within the proposed driveway of the East Structure and would be removed for access to the site. As part of the landscape plan for the proposed project, approximately 31 palm trees would be located along the East Structure and approximately 14 palm trees along the West Structure. The project Applicant would be required to submit an A-Permit, plot plan, color photos, etc., as part of the application for street tree removals. The removal and placement of these trees would be subject to the review and

44 City of Los Angeles Department of City Planning, Los Angeles Tree Ordinance (No. 177404), LAMC, sec. 12.21

approval of the City's Board of Public Works, Urban Forestry Division. Any trees removed within the right-of-way that have an 8-inch or greater trunk diameter (or cumulative trunk diameter if multitrunked) measured from 54 inches above the ground will be replaced with a 24-inch box tree on the parkway of the proposed project site per the current Urban Forestry Division standards. Accordingly, the project Applicant would comply with standard regulations and compliance measures for removal and/or alteration of street trees and impacts would be less than significant.

Mitigation Measures: The following mitigation measures shall be implemented to reduce impacts to a less than significant level.

IV-70 Tree Removal (Non-Protected Trees)

- Prior to the issuance of any permit, a plot plan shall be prepared indicating the location, size, type and general condition of all existing trees on the site and within the adjacent public right(s)-of-way.
- All significant (8-inch or greater trunk diameter, or cumulative trunk diameter if multitrunked, as measured 54 inches above the ground) nonprotected trees on the site proposed for removal shall be replaced at a 1:1 ratio with a minimum 24-inch box tree. Net new trees, located within the parkway of the adjacent public right(s)-of-way, may be counted toward replacement tree requirements.
- Removal or planting of any tree in the public right-of-way requires approval of the Board of Public Works. All trees in the public right-of-way shall conform to the current standards of the Department of Public Works, Urban Forestry Division, Bureau of Street Services.

IV-90 Tree Removal (Public Right-of-Way)

- Removal of trees in the public right-of-way requires approval by the Board of Public Works.
- The required Tree Report shall include the location, size, type, and condition of all existing trees in the adjacent public right-of-way and shall be submitted for review and approval by the Urban Forestry Division of the Bureau of Street Services, Department of Public Works (213-847-3077).
- The plan shall contain measures recommended by the tree expert for the preservation of as many trees as possible. Measures such as replacement by a minimum of 24-inch box trees in the parkway and on the site, on a 1:1 basis, shall be required for the unavoidable loss of significant (8-inch or greater trunk diameter, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground) trees in the public right-of-way.

- All trees in the public right-of-way shall be provided per the current Urban Forestry Division standards.

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. A significant impact would occur if a project was inconsistent with mapping or provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. The proposed project site is located within an urbanized neighborhood and is fully developed with surface parking lots, an approximately 4,175-square-foot, two-story building and three (3) billboard sign structures. The proposed project site is not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan. Therefore, no impacts would occur.

Mitigation Measures: No mitigation measures are necessary.

Cumulative Impacts

No Impact. The proposed project and related projects are located within an urbanized neighborhood on sites currently developed with urban uses. Development of the proposed project, in combination with the identified related projects, would not result in significant impacts to wildlife corridors or habitat for any candidate, sensitive, or special status species identified in local plans, policies, or regulations, or by the CDFW or the USFWS. No such habitat occurs near the proposed project site or related projects due to the existing urban development. Development of any of the related projects would be subject to the City's Protected Tree Ordinance. Thus, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

4.5 CULTURAL RESOURCES

a. ***Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?***

Less than Significant Impact. Based on the criteria stated in the LA CEQA *Thresholds Guide*, a significant impact could occur if a project disturbed historic resources that exist within a project site.

The proposed project site is located within an urbanized neighborhood and is currently developed with surface parking lots; an approximately 4,175-square-foot, two-story building; and three (3) billboard sign structures. The existing commercial building was constructed in 1965, approximately 50 years ago; however, the building was not identified in the 2012 SurveyLA *Los Angeles Historic Resources Survey Report, South Los Angeles Community Plan Area*.⁴⁵ This survey focused on identifying historic resources dating from 1850 to 1980 and identifying those resources that met criteria for eligibility for listing in the National Register of Historic Places, California Register of Historical Resources, or for local designation as a Los Angeles Historic-Cultural Monument. Therefore, the existing commercial building on the proposed project site would not be considered a historical resource pursuant to CEQA. The nearest historical resources or potential historical resources to the proposed project site are the Coliseum and residential buildings within the Exposition Park Square Historic District.

Located north of the proposed project site, across MLK Blvd., the Coliseum was listed as a National Historic Landmark in 1984 for its national and international historic significance as the focal site of the 10th Olympiad of the modern era, the Los Angeles Summer Games of 1932. Constructed in 1921-23, and enlarged for the 1932 Games, the Coliseum is considered one of the premier outdoor sports facilities of the world. It is also highly important as the scene of numerous other sporting and civic events and as a key example of the architectural work of John and Donald Parkinson, two of the most prominent Los Angeles architects of the early 20th century.⁴⁶ The proposed project would include the demolition of a non-historic building, parking lots, and billboards and the construction of two new structures on the proposed project site, approximately 800 feet south of the Coliseum. No access, staging, or construction would occur within the boundary of or adjacent to the Coliseum. Accordingly, the proposed project would not cause a substantial adverse change to the Coliseum.

The proposed project site is also located immediately adjacent to the north and east of the Exposition Park Square Historic District. This neighborhood was identified as eligible for historic district designation in the

45 Architectural Resources Group, Inc., *Historic Resources Survey Report, South Los Angeles Community Plan Area*. Prepared for City of Los Angeles, Department of City Planning, Office of Historic Resources (Pasadena, CA: 2012).

46 National Register of Historic Places, Los Angeles Memorial Coliseum, Los Angeles, Los Angeles County, California, National Register #84003866.

2012 Survey LA *Los Angeles Historic Resources Survey Report, South Los Angeles Community Plan Area*.⁴⁷ Located between Menlo Avenue and Hoover Street, the Exposition Park Square Historic District includes 90 buildings constructed between 1913 and 1928 on MLK Blvd., 40th Place, and 41st Street. The historic district was found to be significant as a concentration of multi-family residential buildings, including fourplexes, duplexes, and small apartment houses. Also significant as an example of a tract subdivided and marketed specifically for its proximity to streetcar lines, the historic district contains approximately 65 buildings that contribute to its significance. One of those contributing buildings is on a parcel adjacent to the west of the proposed project site. Located at 826 MLK Blvd., this fourplex was constructed in 1922 and represents an example of Mediterranean Revival style architecture. The West Structure would be five stories, or approximately 54 feet in height, with an additional approximately 12 feet to account for elevator shafts, rooftop lights and equipment, and would be designed of similar materials such as exposed concrete facades and similar earth tone color schemes, as the building to the west. While adjacent to the proposed project site, neither this building nor any other contributor to the historic district would be impacted by the construction or operation of the proposed project. The construction of a new structure on the parcel adjacent to the historical resources would generate low levels of groundborne vibration. However, as discussed in **Section 4.12, Noise**, the level of groundborne vibration expected would not reach or exceed the most restrictive threshold for building damage from vibration for historic buildings. All construction, access, and staging related to the proposed project would occur entirely outside of the historic district boundary, and the proposed project would not directly affect any of the historic buildings in the vicinity. Therefore, implementation of the proposed project would not cause an adverse change to the eligible historical district. Thus, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

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

Less than Significant Impact. Based on the criteria stated in the LA *CEQA Thresholds Guide*, a significant impact could occur if grading or excavation activities associated with a project would disturb archaeological resources that presently exist within a project site. The proposed project site and immediately surrounding areas do not contain any known archaeological sites or archaeological survey areas. The proposed project site has been previously excavated and disturbed for surface parking lots. Thus, the potential for an impact to previously undisturbed archaeological materials is low.

47 Architectural Resources Group, Inc., *Historic Resources Survey Report, South Los Angeles Community Plan Area, Appendix C: Historic Districts and Planning Districts*. Prepared for City of Los Angeles, Department of City Planning, Office of Historic Resources. (Pasadena, CA: 2012), 38.

However, as a precautionary measure if any archaeological materials were encountered during the course of proposed project development, all further development activity would halt and the services of an archaeologist would be secured, as indicated in Regulatory Compliance Measure RC-CR-2. The archaeologist would assess the discovered material(s) and prepare a survey, study, or report evaluating the impact. The report would contain recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource, and the Applicant would comply with the recommendations of the evaluating archaeologist as contained in the survey, study, or report. Proposed project development would resume once copies of the archaeological survey, study, or report are submitted to the South Central Coastal Information Center (“SCCIC”) Department of Anthropology. The archaeologist’s survey, study, or report would be submitted prior to the issuance of any building permit. In addition, the Applicant would submit a letter to the case file indicating what, if any, archaeological reports have been submitted, or a statement indicating that no material was discovered. A covenant and agreement binding the applicant to this condition would be recorded prior to issuance of a grading permit. Should an archaeologist be needed, the Applicant would contact the SCCIC, located at California State University (“CSU”) Fullerton, or a member of the Society of Professional Archaeologists (“SOPA”), or a SOPA-qualified archaeologist. Copies of the archaeological survey, study, or report would be submitted to the SCCIC Department of Anthropology.

Regulatory Compliance Measure RC-CR-2 (Archaeological): If archaeological resources are discovered during excavation, grading, or construction activities, work shall cease in the area of the find until a qualified archaeologist has evaluated the find in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Personnel of the project shall not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the project site. The found deposits would be treated in accordance with Federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2.

With the implementation of Regulatory Compliance Measure RC-CR-2, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

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

Less than Significant Impact. Based on the criteria stated in the LA CEQA Thresholds Guide, a significant impact could occur if grading or excavation activities associated with a project were to disturb paleontological resources or geologic features that presently exist within a project site. The proposed

project site and immediately surrounding areas do not contain any known paleontological resources or geologic features. The proposed project site has been disturbed and excavated. Thus, the potential for an impact to previously undisturbed paleontological resources or geologic features is low.

However, as a precautionary measure should any paleontological resources be encountered during the course of proposed project development, all further development activity would halt and the services of a paleontologist would be secured, as indicated in Regulatory Compliance Measure RC-CR-3. The paleontologist would assess the discovered resource and prepare a survey, study, or report evaluating the impact. The report would contain recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource, and the Applicant would comply with the recommendations of the evaluating paleontologist as contained in the survey, study, or report. Proposed project development would resume once copies of the paleontological survey, study, or report are submitted to the Los Angeles County Natural History Museum. The paleontologist's survey, study, or report would be submitted prior to the issuance of any building permit. In addition, the Applicant would submit a letter to the case file indicating what, if any, paleontological reports have been submitted, or a statement indicating that no resource was discovered. A covenant and agreement binding the Applicant to this condition would be recorded prior to issuance of a grading permit.

Regulatory Compliance Measure RC-CR-3 (Paleontological): If paleontological resources are discovered during excavation, grading, or construction, the City of Los Angeles Department of Building and Safety shall be notified immediately, and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. Construction activity may continue unimpeded on other portions of the project site. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. The found deposits would be treated in accordance with Federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2.

With implementation of Regulatory Compliance Measure RC-CR-3, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

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

Less than Significant Impact. Based on the criteria stated in the LA CEQA Thresholds Guide, a project-related, significant adverse effect could occur if grading or excavation activities associated with a project would disturb previously interred human remains. No known human burials have been previously identified on the proposed project site. The proposed project site has been disturbed and excavated in the

past. Approved by Governor Brown on September 25, 2014, Assembly Bill 52 (AB 52) establishes a formal consultation process for California Native American tribes to identify potential significant impacts to tribal cultural resources, as defined in Public Resources Code Section 21074 as part of CEQA. The City sent out tribal notifications on April 7, 2016 pursuant to AB 52 and have received no response to date. Thus, the potential for impact on previously human remains is low. Although no human remains are known to exist on site, there is a possibility that human remains exist at subsurface levels and may be uncovered during excavation of the proposed foundation levels.

In the event that human remains are discovered during excavation activities, excavations would immediately stop and the County Coroner would be contacted, as indicated in Regulatory Compliance Measure RC-CR-4. The County Coroner would have two working days to examine human remains after being notified by the responsible person. If the remains were found to be Native American, the County Coroner would have 24 hours to notify the Native American Heritage Commission. The Native American Heritage Commission would immediately notify the person it believes to be the most likely descendent of the deceased Native American. The most likely descendent would have 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods. Should the descendent not make recommendations within 48 hours, the owner would reinter the remains in an area of the property secure from further disturbance; or should the owner not accept the descendant's recommendations, the owner or the descendent may request mediation by the Native American Heritage Commission.

Regulatory Compliance Measure RC-CR-4 (Human Remains): If human remains are encountered unexpectedly during construction demolition and/or grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code (PRC) Section 5097.98. In the event that human remains are discovered during excavation activities, the following procedure shall be observed:

- Stop immediately and contact the County Coroner, 1104 North Mission Road, Los Angeles, CA 90033; 323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or 323-343-0714 (After Hours, Saturday, Sunday, and Holidays)

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

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

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

With implementation of Regulatory Compliance Measure RC-CR-4, impacts related to the disturbance of human remains would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

Cumulative Impacts

Less than Significant Impact. Implementation of the proposed project, in combination with the related projects in the proposed project site vicinity, would result in the continued redevelopment and revitalization of the surrounding area. Impacts to cultural resources tend to be site specific and are assessed on a site-by-site basis. The existing two-story building on the proposed project site was found not to meet the criteria to be eligible to the National Register of Historic Places or the California Register of Historical Resources, or as a City Historic-Cultural Landmark or Historic-Cultural Monument. The analysis concluded that the proposed project would have less than significant impacts with respect to cultural resources with the implementation of appropriate regulatory compliance measures. It is expected that related projects would also incorporate regulatory compliance measures recommended by the City, should they encounter cultural resources. Thus, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

4.6 GEOLOGY AND SOILS

Impact Analysis

The following section summarizes and incorporates by reference information from the *Preliminary Geotechnical Assessment: Proposed Honda Dealership W Martin Luther King Jr Blvd*, prepared by Group Delta on March 10, 2016 (the “Geotechnical Report”). The Geotechnical Report is included as **Appendix C** to this Initial Study.

a. *Would the project expose people or structures to 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. Based on the criteria established in the LA *CEQA Thresholds Guide*, a significant impact may occur if a project site is located within a State-designated Alquist-Priolo Zone or other designated fault zone. The closest active fault is the Puente Hills Blind Thrust Fault approximately 1.84 miles from the proposed project site. As mentioned in the Geotechnical Study in **Appendix D**, the closest active fault zone to the proposed project site is the Newport-Inglewood Fault Zone, located approximately 3.8 miles west of the proposed project site. According to the City of Los Angeles General Plan (“General Plan”), the proposed project site is not located within a seismic hazard zone for liquefaction, landsliding, or faulting, as delineated by the State of California, in accordance with the Seismic Hazards Mapping Act or the Alquist-Priolo Act.⁴⁸ As such, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

- ii. *Strong seismic ground shaking?***

Less than Significant Impact. Based on the criteria established in the LA *CEQA Thresholds Guide*, a significant impact may occur if a project represents an increased risk to public safety or destruction of property by exposing people, property, or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with other locations in Southern California. Southern California is a seismically active region. The intensity of ground shaking depends primarily upon the earthquake magnitude, the distance from the source, and the site-response characteristics. Seismically

⁴⁸ City of Los Angeles General Plan, “Safety Element” (1990).

induced settlement is often caused when loose- to medium-density granular soils are compacted during ground shaking.

The Geotechnical Study indicates that the proposed project site is underlain predominantly by loose to medium dense silty sand beneath existing asphalt pavement. The potential for seismically induced settlement at the proposed project site is considered small and the geotechnical conditions are favorable for foundations, provided the design and construction of the proposed project is to the satisfaction of the Department of Building and Safety.⁴⁹ Additionally, the design and construction of the proposed project would conform to the Los Angeles Building Code seismic standards as approved by the Department of Building and Safety. The proposed project would be designed to comply with the California Building Code (“CBC”) and would not be more prone to shaking than similar structures. Thus, impacts related to seismic ground shaking would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

iii. Seismic-related ground failure, including liquefaction?

Liquefaction

Less than Significant Impact. Liquefaction is the loss of soil strength or stiffness due to buildup of pore-water pressure during severe ground shaking. Liquefaction is associated primarily with loose (low-density), saturated, fine- to medium-grained, cohesionless soils. Based on the criteria established in the LA CEQA *Thresholds Guide*, a significant impact may occur if a project site is located within a liquefaction zone. Based on the Hollywood Quadrangle of the State Earthquake Fault Zones map, dated November 6, 2014, the proposed project site is not located within a seismic hazard zone for liquefaction. Furthermore, the proposed project site is not located within an area susceptible to liquefaction according to the City of Los Angeles Safety Element.⁵⁰ Thus, seismic related liquefaction impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

Seismically-induced Settlement

Potentially Significant Impact Unless Mitigation Incorporated. Seismically-induced settlement of the dry upper silty sand and sandy silt would be up to approximately 0.7 inch for the current site conditions due

49 Group Delta, *Preliminary Geotechnical Assessment: Proposed Honda Dealership W Martin Luther King Jr Blvd* (March 2016).

50 Los Angeles Safety Element, Exhibit B, Areas Susceptible to Liquefaction, <http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf>

to the loose sandy soils in the upper 10 to 15 feet. Based on the potential for settlement during a seismic event, impacts would be potentially significant unless mitigated.

Mitigation Measures: The following mitigation measure shall be implemented to reduce potential seismically induced settlement impacts to a less than significant level.

MM GEO-1 Prior to the issuance of building permits, the Applicant shall submit a design level geotechnical report, prepared by a registered civil engineer or certified engineering geologist, to the Department of Building and Safety for review and approval. The geotechnical report shall assess potential consequences of estimation of settlement, lateral movement, or reduction in foundation soil-bearing capacity, and discuss measures that may include building design consideration. Building design considerations shall include but are not limited to ground stabilization, selection of appropriate foundation type and depths, selection of appropriate structural systems to accommodate anticipated displacements, or any combination of these measures. The proposed project shall comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the proposed project, and as it may be subsequently amended or modified.

iv. Landslides?

No Impact. Based on the criteria established in the *LA CEQA Thresholds Guide*, a project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards that would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. A project-related significant adverse effect may occur if the project is located in a hillside area with soil conditions that would suggest a high potential for sliding. Based on the State of California's "Seismic Hazard Zone Maps, Hollywood Quadrangle,"⁵¹ the proposed project site is not in a designated earthquake-induced landslide hazard zone. Per ZIMAS, the proposed project site is also not located within a City of Los Angeles Hillside Area, Landslide Area, or Special Grading Area. Thus, no impacts would occur.

Mitigation Measures: No mitigation measures are necessary.

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

Less than Significant Impact. According to the *LA CEQA Thresholds Guide*, a project could have significant sedimentation or erosion impacts if it would (a) constitute a geologic hazard to other properties by causing or accelerating instability from erosion; or (b) accelerate natural processes of wind and water erosion and

51 State of California Seismic Hazard Zone Maps for the Hollywood Quadrangle (2014).

sedimentation, resulting in sediment runoff or deposition that would not be contained or controlled on site. Although development of the proposed project has the potential to result in the erosion of soils during site preparation and construction activities, erosion would be reduced by implementation of stringent erosion controls imposed by the City through grading and building permit regulations. Minor amounts of erosion and siltation could occur during grading. The potential for soil erosion during the ongoing operation of the proposed project is extremely low given the predominantly level topography of the proposed project site, and the fact that the proposed project site would be mostly paved over or built upon, so little soil would be exposed.

Nevertheless, grading activities would require grading permits from the Los Angeles Department of Building and Safety (“LADBS”), which include requirements and standards designed to limit potential impacts to acceptable levels. In addition, all on-site grading and site preparation would comply with applicable provisions of Chapter IX, Division 70 of the LAMC, which addresses grading, excavations, and fills.

The grading plan would conform to the City's Landform Grading Manual Guidelines, subject to approval by the Department of City Planning and LADBS's Grading Division. Chapter IX, Division 70 of the LAMC addresses grading, excavations, and fills. The grading plan would also include best management practices (“BMPs”) including but not limited to the following measures: A deputy grading inspector would be on site during grading operations, at the owner’s expense, to verify compliance with these conditions. The deputy inspector would report weekly to LADBS; however, he or she would immediately notify LADBS if any conditions were violated. “Silt fencing” supported by hay bales and/or sand bags would be installed based on the final evaluation and approval of the deputy inspector to minimize water and/or soil from going through any chain-link fencing and potentially resulting in silt washing off site and creating mud accumulation impacts. “Orange fencing” would not be permitted as a protective barrier from the secondary impacts normally associated with grading activities. Movement and removal of approved fencing would not occur without prior approval by LADBS. Thus, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

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

Less than Significant Impact. Based on the criteria established in the LA CEQA Thresholds Guide, a project would normally have a significant geologic hazard impact if it could cause or accelerate geologic hazards causing substantial damage to structures or infrastructure, or expose people to substantial risk of injury.

For the purpose of this specific issue, a significant impact may occur if a project is built in an unstable area without proper site preparation or design features to provide adequate foundations for buildings, thus posing a hazard to life and property.

Based on the City's General Plan, the proposed project site is not located within a geologic unit susceptible to liquefaction, landsliding, or faulting, as delineated by the State of California, in accordance with the Seismic Hazards Mapping Act.⁵²

The Geotechnical Study indicated that the potential for seismically induced settlement could range up to 0.7 inches in the upper 10 to 15 feet of the proposed project site. However, the relatively dense and uniform nature of the underlying alluvial soils would not cause excessive differential settlements. Construction of the proposed project would comply with Regulatory Compliance Measure RC-GEO-1 (Seismic) and Regulatory Compliance Measure RC-GEO-5 (Subsidence). Both regulatory compliance measures require the design and construction of the proposed project to conform to CBC seismic standards as approved by LADBS and comply with the conditions contained within the LADBS's Geology and Soils Report Approval Letter specific to any subsidence and soil strength loss, settlement, and lateral movement or reduction in foundation soil-bearing capacity.

Regulatory Compliance Measure RC-GEO-1 (Seismic): The design and construction of the project shall conform to the California Building Code seismic standards as approved by the Department of Building and Safety.

Regulatory Compliance Measure RC-GEO-5 (Subsidence Area): Prior to the issuance of building or grading permits, the applicant shall submit a geotechnical report prepared by a registered civil engineer or certified engineering geologist to the written satisfaction of the Department of Building and Safety. The geotechnical report shall assess potential consequences of any subsidence and soil strength loss, estimation of settlement, lateral movement or reduction in foundation soil-bearing capacity, and discuss mitigation measures that may include building design consideration. Building design considerations shall include, but are not limited to: ground stabilization, selection of appropriate foundation type and depths, selection of appropriate structural systems to accommodate anticipated displacements or any combination of these measures. The project shall comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the project, and as it may be subsequently amended or modified.

52 City of Los Angeles General Plan, "Safety Element" (1990).

With implementation of Regulatory Compliance Measures RC-GEO-1 and RC-GEO-5, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

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

Less than Significant Impact. Based on the criteria established in the LA CEQA Thresholds Guide, a project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards that would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. For the purpose of this specific issue, a significant impact may occur if a project is built on expansive soils without proper site preparation or design features to provide adequate foundations for buildings, thus posing a hazard to life and property.

The proposed project site currently contains vacant parking lots, a two-story commercial building, and billboard sign structures. As indicated in the Geotechnical Study, the proposed project site consists of silty sand with varying amounts of gravel and are not considered to be expansive. Construction of the proposed project would be required to comply with the CBC, which includes building foundation requirements appropriate to site-specific conditions. Thus, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

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

No Impact. The proposed project site is located in a developed portion of the City and is served by a wastewater collection, conveyance, and treatment system operated by the City. No septic tanks or alternative disposal systems are proposed. Thus, impacts would not occur.

Mitigation Measures: No mitigation measures are necessary.

Cumulative Impacts

Less than Significant Impact. Geotechnical hazards are mostly site-specific. There is little cumulative geological relationship between the proposed project and any of the related projects. Similar to the proposed project, potential impacts related to geology and soils would be assessed on a case-by-case basis and, if necessary, the applicants of the related projects would be required to implement the appropriate

mitigation measures. The analysis of the proposed project's geology and soils impacts concluded that, through the implementation of the mitigation measures recommended previously, proposed project impacts would be reduced to less than significant levels and related projects would implement their own site-specific mitigation measures. Therefore, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

4.7 GREENHOUSE GAS EMISSIONS

Impact Analysis

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

Potentially Significant Unless Mitigation Incorporated. A significant impact could occur if a project would generate greenhouse gas (“GHG”) emissions, either directly or indirectly, that may have a significant impact on the environment. GHG emissions refer to a group of emissions that are believed to affect global climate conditions. These gases trap heat in the atmosphere, and the major concern is that increases in GHG emissions are causing global climate change. Global climate change is a change in the average weather on earth that can be measured by wind patterns, storms, precipitation, and temperature. Although scientists disagree as to the speed of global warming and the extent of the impacts attributable to human activities, most agree that a direct link exists between increased emission of GHGs and long-term global temperature.

The principal GHGs are carbon dioxide (“CO₂”), methane (“CH₄”), nitrous oxide (“N₂O”), sulfur hexafluoride (“SF₆”), perfluorocarbons (“PFCs”), hydrofluorocarbons (“HFCs”), and water vapor (“H₂O”). CO₂ is the reference gas for climate change because it is the predominant GHG emitted. To account for the varying warming potential of different GHGs, GHG emissions are often quantified and reported as CO₂ equivalents (“CO₂e”).

In September 2006, Governor Arnold Schwarzenegger signed the California Global Warming Solutions Act of 2006, also known as Assembly Bill (“AB”) 32, into law. AB 32 focuses on reducing GHG emissions in California, and requires the California Air Resources Board (“CARB”), the State agency charged with regulating Statewide air quality, to adopt rules and regulations that would achieve GHG emissions equivalent to Statewide levels in 1990 by 2020.

As a central requirement of AB 32, the CARB was assigned the task of developing a Scoping Plan that outlines the State’s strategy to achieve the 2020 GHG emissions limit. The Scoping Plan, which was developed by CARB in coordination with the Cap-and-Trade program, was published in October 2008. The Scoping Plan proposed a comprehensive set of actions designed to reduce overall GHG emissions in California, improve the environment, reduce the State’s dependence on oil, diversify the State’s energy sources, save energy, create new jobs, and enhance public health. As required by AB 32, CARB must update its Scoping Plan every five years to ensure that California remains on the path toward a low-carbon future.

CARB updated the Scoping Plan in May 2014 through a *Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document* (FED or 2014 “Scoping Plan”). CARB’s updated projected “business as

usual” (“BAU”) emissions in the 2014 Scoping Plan are based on current economic forecasts (i.e., as influenced by the economic downturn) and certain GHG reduction measures already in place. The BAU projection for 2020 GHG emissions in California was originally estimated to be 596 million metric tons of carbon dioxide equivalent (“MMTCO_{2e}”). The updated calculation of the 2014 Scoping Plan’s estimates for projected emissions in 2020 totals 509 MMTCO_{2e}. Considering the updated BAU estimate of 509 MMTCO_{2e} by 2020, CARB estimates that the State would have to reduce GHG emissions by 21.6-percent from BAU without Pavley regulations, which reduce GHG emissions in new passenger vehicles and the 33 percent renewable portfolio standard (“RPS”); or 15.7 percent from the adjusted baseline (i.e., with Pavley regulations and 33 percent RPS) to return to 1990 emission levels (i.e., 427 MMTCO_{2e}) by 2020, instead of the 28.35 percent BAU reduction previously reported under the Scoping Plan.⁵³

The Sustainable Communities and Climate Protection Act of 2008 (“Senate Bill [SB] 375”) supports the State’s climate action goals to reduce GHG emissions through coordinated transportation and land use planning with the goal of more sustainable communities.

Neither the SCAQMD nor the CEQA Guidelines Amendments adopted by the Natural Resources Agency on December 30, 2009, provide any adopted thresholds of significance for addressing a commercial project’s GHG emissions. Nonetheless, Section 15064.4 of the CEQA Guidelines Amendments serves to assist lead agencies in determining the significance of the impacts of GHGs. Because the City does not have an adopted quantitative threshold of significance for a commercial project’s generation of GHG emissions, the following analysis is based on the SCAQMD published draft interim GHG significance thresholds. The SCAQMD staff convened an ongoing GHG CEQA Significance Threshold Working Group in December 2008. The last proposed significance GHG threshold under discussion by the Working Group in December 2008 was a screening threshold of 3,000 MT/year CO₂E for residential/commercial sources. If the amount of GHG emissions generated by a proposed project would be under these screening thresholds, the impact would not be considered significant. If a project exceeds the screening threshold, then the impact would be considered potentially significant and additional analysis would need to be completed to determine significance.

In addition, as a central component of the CEQA Guidelines, substantial evidence supports that compliance with the LA Green Building Code is qualitatively consistent with Statewide goals and policies in place for the reduction of GHG emissions, including AB 32 and the corresponding Scoping Plan. The City adopted the LA Green Plan to provide a Citywide plan for achieving the City’s GHG emissions targets, for both the existing and future generations of GHG emissions. To further implement the LA Green Plan’s goal of improving energy conservation and efficiency, the Los Angeles City Council has adopted multiple

53 CARB, *Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document* (FED) (May 2014), Attachment D, p. 11.

ordinances and updates to establish the current Los Angeles Green Building Code as it applies to new development projects. With respect to new development, the City adopted the LA Green Building Code (Ordinance No. 181480), which incorporates applicable provisions of the CALGreen Code, and in some cases outlines stricter GHG reduction measures available to development projects in the City. Among the many GHG reduction measures outlined later in this section, the LA Green Building Code requires projects to achieve a 20 percent reduction in potable water use and wastewater generation; to meet and exceed Title 24 Standards adopted by the California Energy Commission on December 17, 2008; and to meet 50 percent construction waste recycling levels. The Scoping Plan encourages communities to adopt building codes that go beyond the State code. Accordingly, as the LA Green Building Code meets and exceeds applicable provisions of the CALGreen Code, a new development project that can demonstrate that it complies with the LA Green Building Code is considered consistent with Statewide GHG reduction goals and policies, including AB 32, and does not make a cumulatively considerable contribution to global warming.

Construction

Construction emissions represent an episodic, temporary source of GHG emissions generally associated with the operation of construction equipment and the disposal of construction waste. To be consistent with the guidance from the SCAQMD for calculating criteria pollutants from construction activities, only GHG emissions from on-site construction activities and off-site hauling and construction worker commuting are considered as project-generated. As explained by the California Air Pollution Control Officer's Association ("CAPCOA") in its 2008 white paper,⁵⁴ the information needed to characterize GHG emissions from manufacture, transport, and end-of-life of construction materials would be speculative at the CEQA analysis level. CEQA does not require an evaluation of speculative impacts.⁵⁵ Therefore, the construction analysis does not consider such GHG emissions.

GHG emissions are reported on an annual basis. Emissions of GHGs were calculated using CalEEMod for each year of construction of the proposed project would be 391.3 MTCO_{2e} (see **Appendix A, Air Quality and Greenhouse Gas Modeling Results**).

The proposed project would comply with all applicable Building Code and permit requirements, including the L.A. Green Building Code. Additionally, with implementation of Mitigation Measure MM VII-10 which would require low and non-VOC paints, impacts would be less than significant.

54 CAPOCA, *CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act* (January 2008), <http://www.energy.ca.gov/2008publications/CAPCOA-1000-2008-010/CAPCOA-1000-2008-010.PDF>.

55 *CEQA Guidelines*, "Speculation," Section 15145.

Operation

The operation of the proposed project would result in GHG emissions from vehicles, energy consumption, water use, and generation of solid waste and wastewater. The potential quantities of emissions were calculated assuming code compliance with the LA Green Building Code. As shown in **Table 4.7-1, Proposed Project Operational Greenhouse Gas Emissions**, the increase in GHG emissions generated by the proposed project would be 1,524.1 MTCO₂e per year. The proposed project would emit below the proposed SCAQMD screening threshold for commercial/residential projects of 3,000 MTCO₂e per year. Through compliance with the CALGreen Code and the LA Green Building Code, the proposed project would be consistent with local and statewide goals and policies aimed at reducing the generation of GHGs. As identified in Mitigation Measure VII-10, the utilization of low- and non-VOC-containing paints, sealants, adhesives, and solvents, as well as designating 20 percent of the parking spaces for electric vehicles, would be implemented in the construction and operation of the proposed project to further reduce the proposed project's GHG emissions. Therefore, the proposed project's generation of GHG emissions would not make a cumulatively considerable contribution to GHG emissions and impacts would be less than significant.

Table 4.7-1
Proposed Project Operational Greenhouse Gas Emissions

Emissions Source	Project GHG Emissions (MTCO₂e/year)
Construction (amortized)	13.0
Operational (mobile) sources ^a	893.2
Area sources	0.01
Energy	538.2
Waste	22.9
Water	56.8
Annual Total	1,524.1

Source: CalEEMod (2014).

Notes: Emissions calculations are provided in **Appendix A, Air Emissions Modeling**. Totals in table may not appear to add exactly due to rounding in the computer model calculations. MTCO₂e = metric tons of carbon dioxide emissions.

^a N₂O emissions account for 0.04 MTCO₂e per year

Mitigation Measures: The following mitigation measure shall be implemented to reduce impacts to a less than significant level.

MM VII-10 Greenhouse Gas Emissions

- Low- and non-VOC containing paints, sealants, adhesives, solvents, asphalt primer, and architectural coatings (where used), or pre-fabricated architectural panels shall be used in the construction of the project.
- Any new construction shall include 20 percent of parking spaces set aside for EV-ready parking.

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

Less than Significant Impact. The goal of AB 32 is to reduce Statewide GHG emissions to 1990 levels by 2020. As previously noted, in 2014, the CARB updated the Scoping Plan, which details strategies to meet that goal. In addition, Executive Order S-3-05 aims to reduce Statewide GHG emissions to 80 percent below 1990 levels by 2050. As previously mentioned, to reduce GHG emissions from energy usage, the City's Department of Environmental Protection, EnvironmentLA, proposes the following goals as drafted in their GreenLA and ClimateLA plans: (1) increase the amount of renewable energy provided by the LADWP to decrease dependence on fossil fuels; (2) present a comprehensive set of green building policies to guide and support private sector development; (3) reduce energy consumed by City facilities and utilize solar heating where applicable; and (4) help citizens to use less energy.

As described previously, through required implementation of the LA Green Building Code, the proposed project would be consistent with local and Statewide goals and policies aimed at reducing the generation of GHGs. The proposed project's generation of GHG emissions would not make cumulatively considerable contribution to conflicting with an applicable plan, policy, or regulation for the purposes of reducing the emissions of greenhouse gasses. Thus, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

Cumulative Impacts

Less than Significant Impacts. As discussed above, the proposed project's GHG emissions is consistent with Statewide goals and policies in place for the reduction of greenhouse gas emissions. Therefore, the proposed project's generation of GHG emissions would not make a cumulatively considerable contribution to GHG emissions. Thus, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

4.8 HAZARDS AND HAZARDOUS MATERIALS

Impact Analysis

- 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. Based upon the criteria established in the LA CEQA Thresholds Guide, a project could have a significant impact to hazards and hazardous materials if: (a) the project involved a risk of accidental explosion or release of hazardous substances (including, but not limited to oil, pesticides, chemicals or radiation); or (b) the project involved the creation of any health hazard or potential health hazard.

The proposed project would require the routine delivery of new automobiles, related parts and service items; the use of oil, lubricant and cleaning products in providing automobile service; and the routine disposal of waste associated with automobile service. The transport, storage, use, and disposal of these materials is subject to Federal, State, and local health and safety requirements. Additionally, operation of the proposed project would involve the use of hazardous materials for auto repair and maintenance as well as routine cleaning, building maintenance and landscaping, including motor oil; other automotive fluids such as brake fluid, transmission fluid, and hydraulic fluid. All potentially hazardous materials would be contained, stored, and used in accordance with the manufacturers' instructions and handled in compliance with the applicable standards and regulations. Employees would be trained on the safe use and storage of such materials. Through adherence to these regulatory guidelines, the proposed project would not create a significant hazard to the public or the environment and impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

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

Less than Significant Impact. Andersen Environmental completed two Phase I Environmental Site Assessments (“ESAs”) and JHA Environmental completed a Phase II Subsurface Soil Assessment for the proposed project site.⁵⁶ (see **Appendix D, Phase I and Phase II ESA**).

The eastern portion of the proposed project site was developed with railroad tracks from at least 1907 to sometime prior to 1922. From 1910 to 1963 a sub-station structure and associated uses were developed, which was operated by the Los Angeles Railway Company for train car repair operations. By 1960, a small commercial structure was developed immediately west of the sub-station structure. In 1963 the sub-station structure was demolished and was redeveloped into the existing parking lot. By 1976, the existing commercial structure was developed into its current configuration. The eastern portion of the proposed project site was also developed with various residential uses up until 1950. By 1956 commercial uses were developed on site, which were removed by 1957 and between 1958 and 1965 the proposed project site was vacant land. By 1968, a restaurant was developed on the site, which was then demolished in 1989 and developed into the existing parking lot by 1994.

As with the eastern portion, the western portion of the proposed project site was developed with railroad tracks between 1907 and 1922. In 1921, a gasoline and oil fueling station was developed, and by 1924 the site was also developed with an automobile repair structure adjacent to the fueling station. By 1932, two residential structures and an associated garage were developed on the western portion of the proposed project site. By 1938, the gasoline station was demolished and a new fueling station was constructed. The automobile repair structure and the new gasoline station were demolished by 1969. A larger gasoline station was then constructed and occupied the site until at least 1980. By 1989, all structures were demolished and the entire western portion of the proposed project site was redeveloped into the existing parking lot.

As indicated by the Phase I ESA, based on the age of the existing commercial structure, there is a potential for asbestos containing materials (“ACMs”) and lead-based paint to be on the proposed project site. Asbestos is a crumbly material often found in older buildings, typically used as insulation in walls or

⁵⁶ Andersen Environmental, *Phase I Environmental Site Assessment Report, 730, 740, and 800 West Martin Luther King Jr. Boulevard and 4011 South Hoover Street, Los Angeles, California, 90037* (January 30, 2015); Andersen Environmental, *Phase I Environmental Site Assessment Report, 601 W 40th Place, Los Angeles, California, 90037* (August 25, 2015); JHA Environmental, *Phase II Subsurface Soil Assessment, 800 Martin Luther King Jr Boulevard, Los Angeles, California, 90037* (March 13, 2015).

ceilings. It was formerly popular as an insulating material because it had the desirable characteristic of being fire resistant. However, it can pose a health risk when very small particles become airborne. These dust-like particles can be inhaled, where their microscopically sharp structures can puncture the tiny air sacs in the lungs, resulting in long-term health problems. When lead-based paint was taken off the market, it is estimated that 80 percent of existing buildings built prior to 1978 contain lead paint. Based on the age of the existing structure, there is a potential for lead-based paint at the proposed project site.

Regulatory Compliance Measure RC-HAZ-1: Explosion/Release (Existing Toxic/Hazardous Construction Materials): Prior to the issuance of any permit for the demolition or alteration of the existing structure(s), the Applicant shall provide a letter to the Department of Building and Safety from a qualified asbestos abatement consultant indicating that no asbestos-containing materials (ACMs) are present in the building. If ACMs are found to be present, they will need to be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other applicable State and Federal rules and regulations.

Regulatory Compliance Measure RC-HAZ-2: Explosion/Release (Existing Toxic/Hazardous Construction Materials): Prior to issuance of any permit for the demolition or alteration of the existing structure(s), a lead-based paint survey shall be performed to the written satisfaction of the Department of Building and Safety. Should lead-based paint materials be identified, standard handling and disposal practices shall be implemented pursuant to OSHA regulations.

Therefore, implementation of Regulatory Control Measures RC-HAZ-1 and RC-HAZ-2 would reduce the impact to a less than significant level.

It should also be noted that the Phase I ESA does not indicate that the proposed project site is located in a recognized methane or methane buffer zone.⁵⁷

A Phase II Subsurface Soil Assessment was prepared on March 13, 2015, to address the historical gasoline stations that were identified as a recognized environmental condition ("REC") on the proposed project site. Based on the subsurface soil assessments performed to date, the soil in the eastern-central portion of the proposed project site is impacted with petroleum hydrocarbons, indicative of old gasoline. Based on the soil data, there is a very low probability that the groundwater beneath the proposed project site has been impacted by the release of gasoline from the site.

While the results of the analysis do not indicate that the detected petroleum hydrocarbons within the proposed project site would pose an unacceptable risk to human health under normal, existing operating

57 Andersen Environmental, *Phase I Environmental Site Assessment Report* (January 30, 2015).

conditions at the site, implementation of Regulatory Compliance Measure RC-HAZ-3 would reduce the impact to a less than significant level.

Regulatory Compliance Measure RC-HAZ-3: Explosion/Release (Soil Gases): During subsurface excavation activities, including borings, trenching and grading, OSHA worker safety measures shall be implemented as required to preclude any exposure of workers to unsafe levels of soil-gases, including, but not limited to, methane.

Mitigation Measures: No mitigation measures are necessary.

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

Less than Significant Impact. The proposed project site is approximately 300 feet southeast of the Ralph M Parsons Preschool. As previously stated in **Section 4.3, Air Quality**, the emissions from the construction equipment would not exceed SCAQMD thresholds. Operation of the proposed project would not generate direct emissions or require handling substantial amounts of hazardous materials that would affect people at an existing school. As stated above, the proposed project would require the routine delivery of new automobiles, related parts and service items; the use of oil, lubricant and cleaning products in providing automobile service; and the routine disposal of waste associated with automobile service. The transport, storage, use, and disposal of these materials is subject to Federal, State, and local health and safety requirements. As such, the proposed project would emit or otherwise expose the school to hazardous emissions, however, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

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 it create a significant hazard to the public or the environment?

Less than Significant Impact. A Phase I ESA was completed for the proposed project site (see **Appendix D**). As part of the Phase I ESA, a search of government databases did not identify the proposed project site to be located on a hazardous materials site. The proposed project site was not identified as a hazardous materials site pursuant to Government Code Section 65962.5 The Phase I ESA identified a history of gasoline stations and an automobile repair facility on the proposed project site. A Phase II Subsurface Soil Assessment was prepared to address the RECs related to the historical gasoline station uses on the proposed project site. The subsurface soil assessments indicated the presence of petroleum hydrocarbons

consistent with old gasoline in the upper soil layers. However, a significant hazard to the public or the environment was not identified by the Phase II. Thus, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

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

No Impact. The closest public airport to the proposed project site is the Los Angeles International Airport (“LAX”). However, given that LAX is located approximately nine miles southeast of the proposed project site, the proposed project would not be located within an airport hazard area. Therefore, no impacts would occur.

Mitigation Measures: No mitigation measures are necessary.

- f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?***

No Impact. The proposed project is not within the vicinity of a private airstrip and not within an area which would expose residents and workers to a safety hazard. The closest private airport is Quail Lake Sky Park Airport in Lancaster, approximately 77 miles northwest of the proposed project site. Thus, no impacts would occur.

Mitigation Measures: No mitigation measures are necessary.

- g. Would the project impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?***

Less than Significant Impact. Based on the criteria established in the LA CEQA Thresholds Guide, a project would normally have a significant impact to hazards and hazardous materials if the project involved possible interference with an emergency response plan or emergency evacuation plan. According to the LA CEQA Thresholds Guide, the determination of significance shall be made on a case-by-case basis considering the degree to which the project may require a new (or interfere with an existing) emergency response or evacuation plan, and the severity of the consequences.

The proposed project site is located approximately 0.2 miles to the east of the intersection of MLK Blvd. at Vermont Avenue, which is a selected disaster route.⁵⁸ While it is expected that the majority of construction activities for the proposed project would be confined to the proposed project site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which may result in temporary street closures. Street closures could have the potential to interfere with established emergency response or evacuation plans. However, any such closures would be temporary in nature and would be coordinated with the City's Department of Transportation, LADBS, and Department of Public Works. Thus, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

h. Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

No Impact. The proposed project site is located in a highly urbanized area of Los Angeles and does not include wildlands or high fire hazard terrain or vegetation. Thus, no impacts would occur.

Mitigation Measures: No mitigation measures are necessary.

Cumulative Impacts

Less than Significant Impact. Development of the proposed project in combination with the related projects has the potential to increase to the transport, storage and use of hazardous materials, within the proposed project vicinity. However, it is expected that the transport, storage and use of hazardous materials would be conducted according to appropriate regulations. The impacts of the proposed project would be less than significant and would not be expected to contribute to potential impacts of other related projects in a cumulative fashion. Thus, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

58 City of Los Angeles General Plan "Safety Element," Exhibit H, Critical Facilities and Lifeline Systems in the City of Los Angeles.

4.9 HYDROLOGY AND WATER QUALITY

Impact Analysis

a. *Would the project violate any water quality standards or waste discharge requirements?*

Less than Significant Impact. Based on the criteria established in the LA CEQA *Thresholds Guide*, a project would normally have a significant impact on surface water quality if discharges associated with the project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (“CWC”) or would cause regulatory standards to be violated, as defined in the applicable National Pollution Discharge Elimination System (“NPDES”) stormwater permit or Water Quality Control Plan for the receiving water body. For the purpose of this specific issue, a significant impact could occur if a project would discharge water not meeting the quality standards of local agencies that regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts could also occur if a project does not comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (“SWRCB”). These regulations include compliance with the Standard Urban Stormwater Mitigation Plan (“SUSMP”) requirements to reduce potential water quality impacts.

Construction Impacts

Three general sources of potential short-term, construction-related stormwater pollution associated with the proposed project include: (1) the handling, storage, and disposal of construction materials containing pollutants; (2) the maintenance and operation of construction equipment; and (3) earth moving activities that, when not controlled, may generate soil erosion via storm runoff or mechanical equipment. Since the proposed project site is greater than one acre in size, a Stormwater Pollution Prevention Plan is required for compliance with the Clean Water Act. The SWPPP would incorporate the required implementation of BMPs for erosion control and other measures to meet the NPDES requirements for stormwater quality. Implementation of the BMPs identified in the SWPPP and compliance with the NPDES and City discharge requirements would ensure that the construction of the proposed project would not violate any water quality standards or discharge requirements, or otherwise substantially degrade water quality. In addition, construction projects that include grading activities during the rainy season must also develop a Wet Weather Erosion Control Plan (“WWECP”). The proposed project would comply with LAMC Chapter IX, Division 70, which addresses grading, excavations, and fills. Compliance with the LAMC and Regulatory Compliance Measure RC-WQ-1 would ensure that construction would not violate any water quality standards or discharge requirements, or otherwise substantially degrade water quality. Any contaminants gathered during routine cleaning of construction equipment would be disposed of in compliance with applicable stormwater pollution prevention permits.

Regulatory Compliance Measure RC-WQ-1 (National Pollutant Discharge Elimination System General Permit): Prior to issuance of a grading permit, the Applicant shall obtain coverage under the State Water Resources Control Board National Pollutant Discharge Elimination System General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, National Pollutant Discharge Elimination System No. CAS000002) (Construction General Permit) for the proposed project. The Applicant shall provide the Waste Discharge Identification Number to the City of Los Angeles to demonstrate proof of coverage under the Construction General Permit. A Storm Water Pollution Prevention Plan shall be prepared and implemented for the proposed Modified Project in compliance with the requirements of the Construction General Permit. The Storm Water Pollution Prevention Plan shall identify construction Best Management Practices to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities.

Therefore, with implementation of Regulatory Compliance Measure RC-WQ-1, the proposed project's construction-related water quality impacts would be less than significant.

Operational Impacts

The proposed project site is primarily covered with impervious surfaces. As such, the surface water runoff from the proposed project site is directed to adjacent storm drains and does not percolate into the groundwater table beneath the site. Before operation, surface water runoff from the proposed project site would continue to be collected on the site and directed toward existing storm drains in the proposed project vicinity that have adequate capacity. The proposed project would be required to incorporate operational BMPs per the City SUSMP permit requirements. The proposed project's SUSMP would set forth long-term BMPs to prevent adverse impacts to water quality during proposed project operations. For example, the SUSMP would set forth structural BMPs that must be built into the proposed project for ongoing water quality purposes and would be subject to review by the City for compliance with the City's *Best Management Practices Handbook, Part B: Planning Activities*. Long term BMPs for this proposed project could include but are not limited to ensuring that discharge from downspouts, roof drains, and scuppers would not be permitted on unprotected soils. The final selection of BMPs would be completed through coordination with the City. Through preparation and implementation of the SUSMP, operational water quality impacts of the proposed project would be minimized. Pursuant to local practice and City policy, stormwater retention will be required as part of the Low Impact Development ("LID") and SUSMP implementation features.⁵⁹

⁵⁹ City of Los Angeles, Los Angeles Municipal Code, ch. 6, art. 4.4, sec. 64.70.01 and 64.72; and ch. 9, art. 1, sec. 64.72.05 (October 2011).

The proposed project design includes the installation of a reclaimed water system for water efficiency. Recovered wash water would be collected in a reclaim/clarifier tank which is then separated and cleaned through a biological/aeration process, and then re-used. Utilizing this system, approximately one-third of the wash water would be treated by the reclaimed water system and discharged into the sewer system and not the storm drain system near the proposed project site. Water quality impacts would be less than significant.

Similar to the existing uses on the proposed project site, the proposed project would continue to generate surface water runoff during operation. The proposed project site is generally covered with impervious surfaces with no landscaping directly on the proposed project site. Therefore, the majority of the surface water runoff from the proposed project site is directed to adjacent storm drains and does not percolate into the groundwater table beneath the site. Potential impacts to surface water runoff would be mitigated to a level of insignificance by incorporating stormwater pollution control measures, as required by the City's Stormwater LID Ordinance. The proposed project would be required to demonstrate compliance with LID Ordinance standards and retain and treat the first ¼-inch of rainfall in a 24-hour period. When in compliance with the City's Stormwater LID Ordinance, the proposed project would minimize the amount of polluted surface water runoff from entering the local storm drains. City Ordinances No. 172,176 and No. 173,494 specify Stormwater and Urban Runoff Pollution Control that requires the application of BMPs. The proposed project would also comply with water quality standards and wastewater discharge requirements set forth by the SUSMP for Los Angeles County and Cities in Los Angeles County and approved by the Los Angeles Regional Water Quality Control Board ("LARWQCB"). Full compliance with the City's Stormwater LID Ordinance and implementation of design-related BMPs would ensure that the operation of the proposed project would not violate any water quality standards or discharge requirements, or otherwise substantially degrade water quality.

The proposed project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. With implementation of Regulatory Compliance Measures RC-WQ-3 and RC-WQ-4, impacts would be less than significant.

Regulatory Compliance Measure RC-WQ-3 (Low Impact Development Plan): Prior to issuance of grading permits, the Applicant shall submit a Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan to the City of Los Angeles Bureau of Sanitation Watershed Protection Division for review and approval. The Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook.

Regulatory Compliance Measure RC-WQ-4 (Development Best Management Practices): The Best Management Practices shall be designed to retain or treat the runoff from a storm event producing 0.75 inch of rainfall in a 24-hour period, in accordance with the Development Best Management Practices Handbook Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect confirming that the proposed Best Management Practices meet this numerical threshold standard shall be provided.

Mitigation Measures: No mitigation measures are necessary.

- b. *Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?***

No Impact. Based on the criteria established in the LA CEQA Thresholds Guide, a project would normally have a significant impact on groundwater level if it would change potable water levels sufficiently to (a) reduce the ability of a water utility to use the groundwater basin for public water supplies, conjunctive use purposes, storage of imported water, summer/winter peaking, or respond to emergencies and drought; (b) reduce yields of adjacent wells or well fields (public or private); (c) adversely change the rate or direction of flow of groundwater; or (d) result in demonstrable and sustained reduction in groundwater recharge capacity.

No substantial area of pervious surface exists on the proposed project site. As such, the majority of surface water runoff from the proposed project site is directed to adjacent storm drains and does not percolate into the groundwater table beneath the proposed project site. Although the proposed project would excavate to accommodate foundations, excavation would not be deep enough to impact the groundwater table. Therefore, no impacts would occur.

Mitigation Measures: No mitigation measures are necessary.

- 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, in a manner which would result in substantial erosion or siltation on- or off-site?***

Less than Significant Impact. Based on the criteria established in the LA CEQA Thresholds Guide, a project would normally have a significant impact on surface water hydrology if it would result in a permanent,

adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow. The proposed project site is located in a highly urbanized area of Los Angeles, and no streams or river courses are located on or near the proposed project site. The majority of the proposed project site consists of impervious surfaces with some ornamental landscape. Implementation of the proposed project would not increase site runoff or result in any changes in the local drainage patterns. Implementation of the SUSMP, however, would reduce the amount of surface water runoff after storm events, as the proposed project would be required to implement stormwater BMPs to retain or treat the runoff from a storm event producing $\frac{3}{4}$ -inch of rainfall in a 24-hour period. Thus, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

- d. 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 substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?***

No Impact. Based on the criteria established in the LA CEQA Thresholds Guide, a project would normally have a significant impact on surface water hydrology if it would result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow. As previously indicated, the proposed project would be designed to include SUSMP and LID BMPs to maintain and treat the first $\frac{3}{4}$ -inch of a 24-hour storm. Therefore, the existing off-site surface water runoff would be maintained. Examples of BMPs include but are not limited to ensuring that discharge from downspouts, roof drains, and scuppers would not be permitted on unprotected soils. The proposed project would not result in a significant increase in site runoff, or any changes in the local drainage patterns, which would result in flooding on or off site. Thus, no impacts would occur.

Mitigation Measures: No mitigation measures are necessary.

- e. Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?***

Less than Significant Impact. Based on the criteria established in the LA CEQA Thresholds Guide, a project would normally have a significant impact on surface water quality if discharges associated with the project would create pollution, contamination, or nuisance as defined in Section 13050 of the CWC or that cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan for the receiving water body. For the purpose of this specific issue, a significant impact

may occur if the volume of stormwater runoff from a project site were to increase to a level that exceeds the capacity of the storm drain system serving the project site or provides substantial sources of polluted runoff. A project-related significant adverse effect would also occur if a project would substantially increase the probability that polluted runoff would reach the storm drain system or that would increase runoff of any water.

Existing storm drain catch basins are located north of the intersection of MLK Blvd. and Hoover St., less than one block from the proposed project site. A 24-inch storm drain trunk runs along MLK Blvd. near the proposed project site, which connects to storm drain trunk lines running away from the proposed project site along Vermont Avenue.⁶⁰ Storm drain facilities are owned and maintained by the City.

The proposed project site is generally impervious, with minimal ornamental landscaping. The landscape design for the proposed project includes up to 45 new palm trees and groundcover consisting of shrubs. All surface water is directed off site to the adjacent storm drain system. The proposed project would not result in a significant increase in site runoff, or any changes in the local drainage patterns. Runoff from the proposed project site currently is, and would continue to be, collected on the site and directed towards existing storm drains in the proposed project vicinity that have adequate capacity. Pursuant to local practice and City policy, stormwater retention would be required as part of the LID/SUSMP implementation features (despite no increased imperviousness of the site). Any contaminants gathered during routine cleaning of construction equipment would be disposed of in compliance with applicable stormwater pollution prevention permits. Further, any pollutants from the proposed project site would be subject to the requirements and regulations of the NPDES and applicable LID Ordinance requirements. Accordingly, the proposed project would be required to demonstrate compliance with LID Ordinance standards and retain or treat the first ¾-inch of rainfall in a 24-hour period. The proposed project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. With implementation of Regulatory Compliance Measures RC-WQ-3 and RC-WQ-4, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

f. Would the project otherwise substantially degrade water quality?

Less than Significant Impact. A significant impact may occur if a project includes potential sources of water pollutants that would have the potential to substantially degrade water quality. As previously indicated, the proposed project would include BMPs to treat and retain the first ¾ inch of rainfall over a 24-hour

⁶⁰ County of Los Angeles Department of Public Works. "Los Angeles County Storm Drain System," <http://dpw.lacounty.gov/fcd/stormdrain/index.cfm>, accessed March 2016.

period on site. Therefore, the proposed project would not otherwise substantially degrade water quality of surface water leaving the site.

The proposed project would utilize oil, lubricants, solvents and other chemicals that have the potential to degrade water quality. However, these substances would be stored and utilized within the structure and in compliance with all applicable Federal, State, and local regulations. As such, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

g. Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

No Impact. A significant impact would occur if a project was to place housing within a 100-year flood hazard area. A 100-year flood is defined as a flood resulting from a severe rainstorm, which has a probability of occurring approximately once every 100 years. According to the City and the Federal Emergency Management Agency (“FEMA”) flood insurance rate map for the proposed project Area, the proposed project site is not located within a designated flood zone.⁶¹ Additionally, the proposed project does not include housing. The proposed project would not place housing within a 100-year flood hazard area. Thus, no impacts would occur.

Mitigation Measures: No mitigation measures are necessary.

h. Would the project place within a 100-year flood hazard area structures, which would impede or redirect flood flows?

No Impact. A significant impact may occur if a project site was located within a 100-year flood zone, which would impede or redirect flood flows. The proposed project site is not in an area designated as a 100-year flood hazard area. The proposed project site is located in a highly urbanized area and no changes to the local drainage pattern would occur with implementation of the proposed project. The proposed project would not have the potential to impede or redirect floodwater flows. Thus, no impacts would occur.

Mitigation Measures: No mitigation measures are necessary.

61 City of Los Angeles, General Plan, Safety Element (November 1996), Exhibit F, 100-Year & 500-Year Flood Plains in the City of Los Angeles and Federal Emergency Management Agency, “Flood Insurance Rate Map (FIRM)” (2008), <http://www.fema.gov/floodplain-management/flood-insurance-rate-map-firm>.

i. Would the project expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?

Less than Significant Impact. A significant impact could occur if a project exposes people or structures to a significant risk of loss or death caused by the failure of a levee or dam. Based on the Inundation & Tsunami Hazard Areas map in the Safety Element of the City's General Plan, the proposed project site is located within a potential inundation area of the Hansen Dam and the Sepulveda Dam, both in the San Fernando Valley. This map is based on a scenario in which dam failure results in a surge of substantial flood waters in the Los Angeles river that spill its banks in downtown Los Angeles and spread across south Los Angeles. These dams are continually monitored by various governmental agencies (such as the State of California Division of Safety of Dams and United States Army Corps of Engineers) to guard against the threat of dam failure. Current design and construction practices and ongoing programs of review, modification, or total reconstruction of existing dams are intended to ensure that all dams are capable of withstanding the maximum credible earthquake ("MCE") for the site. As such, the proposed project is considered to have a less than significant impact.

Mitigation Measures: No mitigation measures are necessary.

j. Would the project expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow?

No Impact. A significant impact would occur if a project site is sufficiently close to the ocean or other water body to potentially be at risk of the effects of seismically induced tidal phenomena (i.e., seiche and tsunami), or if a project site is located adjacent to a hillside area with soil characteristics that would indicate potential susceptibility to mudslides or mudflows. The proposed project site is not located in a potential seiche or tsunami zone. With respect to the potential impact from a mudflow, the proposed project site is relatively flat and surrounded by urban development; the proposed project site is located greater than one mile from Griffith Park and the eastern end of the Santa Monica Mountains (which are identified as areas with the potential for landslides).⁶² As such, there are no sources of mudflow near the proposed project site. Thus, no impacts would occur.

Mitigation Measures: No mitigation measures are necessary.

62 City of Los Angeles General Plan, "Safety Element," Exhibit C Landslide Inventory & Hillside Areas (1996), p. 51.

Cumulative Impacts

Less than Significant Impact. Development of the proposed project in combination with the other related projects would result in the further infilling of uses in an already dense urbanized area. As discussed above, the proposed project site and the surrounding areas are served by the existing City storm drain system. Runoff from the proposed project site and adjacent urban uses is typically directed into the adjacent streets; from which it then flows to the nearest drainage improvements. It is likely that most if not all of the related projects would also drain to the surrounding street system. However, little if any additional cumulative runoff is expected from the proposed project site and related project sites, since this part of the City is generally developed with impervious surfaces. Under the requirements of the LID Ordinance, each related project would be required to implement stormwater BMPs to retain or treat the runoff from a storm event producing $\frac{3}{4}$ inch of rainfall in a 24-hour period. Mandatory structural BMPs in accordance with the NPDES water quality program would therefore result in a cumulative reduction to surface water runoff, because the development in the surrounding area would be limited to infill developments and redevelopment of existing urbanized areas. The proposed project would not make a cumulative contribution to the volume or quality of surface water runoff and cumulative impacts to the existing or planned stormwater drainage systems would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

4.10 LAND USE AND PLANNING

Impact Analysis

a. Would the project physically divide an established community?

No Impact. A significant impact may occur if a project is sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community. According to the LA CEQA *Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering the following factors: (1) the extent of the area that would be impacted, the nature and degree of impacts, and the types of land uses within that area; (2) the extent to which existing neighborhoods, communities, or land uses would be disrupted, divided or isolated, and the duration of the disruptions; and (3) the number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the project.

The proposed project site is located within an urbanized area of the South Los Angeles community and is consistent with the existing physical arrangement of the properties near the proposed project site. No separation of uses or disruption of access between land use types would occur as a result of the proposed project. Implementation of the proposed project would not disrupt or divide the physical arrangement of the established community. Thus, no impacts would occur.

Mitigation Measures: No mitigation measures are necessary.

b. Would the project conflict with an applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Less than Significant Impact. A significant impact may occur if a project is inconsistent with the General Plan or zoning designations currently applicable to a project site, and would cause adverse environmental effects, which the General Plan and zoning ordinance are designed to avoid or mitigate.

The proposed project site is located within the jurisdiction of the City, and is therefore subject to the designations and regulations of several local and regional land use and zoning plans. At the regional level, the proposed project site is located within the planning area of SCAG. The proposed project is also located within the South Coast Air Basin and therefore, is within the jurisdiction of the SCAQMD. At the local level, development of the proposed project site is guided by the City's General Plan, the Community Plan, and the LAMC.

Regional Plans

SCAQMD Air Quality Management Plan. As noted in **Section 4.3, Air Quality**, the proposed project would not exceed the daily emissions thresholds during the construction or operational phases. Furthermore, the proposed project would be consistent with the AQMP.

SCAG Regional Comprehensive Plan. The proposed project site is located within the six-county region that comprises the SCAG planning area. The SCAG RCP includes growth management policies that strive to improve the standard of living, maintain the regional quality of life, and provide social, political, and cultural equity. The guiding principles of the RCP are: (1) Improve mobility for all residents; (2) Foster livability in all communities; (3) Enable prosperity for all people; and (4) Promote sustainability for future generations. The proposed project would be consistent with policies set forth in the RCP because it would develop an underdeveloped site within an existing urban setting. As it would not displace or introduce population, the proposed project would be consistent with SCAG growth projections for the City.

Relevant land use goals of the RCP include focusing growth along transportation corridors; targeting growth within walking distance of transit; and injecting new life into under-used areas. The proposed project would further these strategies by redeveloping an existing parking lot and underutilized commercial property with a more active commercial use. As an existing business relocating within the City, the proposed project would not generate substantial new population that would exceed SCAG's growth projections as the existing employees and new employees would be primarily drawn from the surrounding neighborhoods.

SCAG 2012 Regional Transportation Plan/Sustainable Communities Strategies (2012 RTP/SCS).

SCAG's 2012 RTP/SCS presents a long-term transportation vision through the year 2035 for the SCAG region. The mission of the 2012–2035 RTP/SCS is to provide "leadership, vision and progress which promote economic growth, personal well-being, and livable communities for all Southern Californians." The 2012–2035 RTP/SCS places a greater emphasis on sustainability and integrated planning compared to previous versions of the RTP, and identifies mobility, economy, and sustainability as the three principles most critical to the future of the region. The 2012–2035 RTP/SCS goals include the following: (1) maximize mobility and accessibility for all people and goods in the region; (2) ensure travel safety and reliability for all people and goods in the region; (3) preserve and ensure a sustainable regional transportation system; (4) maximize the productivity of the transportation system; (5) encourage land use and growth patterns that facilitate transit and nonmotorized transportation; and (6) protect the environment and health of residents by improving air quality and encouraging active transportation (nonmotorized transportation, such as bicycling and walking).

The proposed project would be consistent with these goals by expanding commercial facilities in an area that is already served by nearby public infrastructure and transportation. Specifically, regional access is provided by US 110 and I-10, east and north of the proposed project site, respectively. In addition, the proposed project area is well served by transit facilities, including Metro Bus Route 40. The proposed project is also approximately 0.75 miles southwest of an existing Metro Silver and Expo stations. The proposed project's development of commercial uses close to these existing transportation facilities would maximize the productivity of the existing transportation system. The proposed project would comply with the City's design standards for access driveways and would not include any hazardous design features that could pose safety issues to travelers. Therefore, the proposed project would also support the goal to ensure travel safety and reliability for all people and goods in the region. Further, as discussed below in **Section 4.16, Transportation and Traffic**, proposed project impacts related to the Los Angeles County Congestion Management Program, which serves as the monitoring and analytical basis for regional transportation funding decisions, would be less than significant. The proposed project would also support the use and productivity of the public transportation system by concentrating new development within an area well served by a regional transportation system and transit opportunities.

Local Plans

City of Los Angeles General Plan

The proposed project would conform to the applicable objectives outlined in the General Plan.⁶³ The General Plan is a comprehensive, long-range declaration of purposes, policies, and programs for the development of the City consisting of 11 elements: 10 Citywide elements (Air Quality Element, Conservation Element, Historic Preservation and Cultural Resources Element, Housing Element, Infrastructure Systems Element, Noise Element, Open Space Element, Public Facilities and Services Element, Safety Element, and Mobility Element) and the Land Use Element, which provides individual plans for each of the City's 35 Community Planning Areas.

The elements that would be most applicable to the proposed project are the Air Quality Element, Land Use Element, Housing Element, Conservation Element, Open Space Element and Mobility Element. Analysis of these elements follows:

Air Quality Element

The proposed project would comply with SB 375 and AB 32 by contributing to a reduction in GHG emissions through integrated land use and transportation planning. The key component of GHG emissions is the reduction of emissions from passenger vehicles, which represents about one-third of overall GHG emissions in the United States. Land use is among the top strategies to reduce such emissions. Compact

63 *City of Los Angeles General Plan.*

development, which includes access and proximity to transit and concentrations of population and/or employment as a result of high-density residential and/or commercial development, can reduce congestion, lower infrastructure costs, and reduce household expenses related to transportation and energy, according to a 2010 report published by the Urban Land Institute.⁶⁴ The key to successful compact development is a land use pattern that has a high-quality pedestrian network and a variety of land uses within walking distance of each other.⁶⁵

The proposed project's location would be approximately 0.75 miles south of existing Metro Silver and Expo stations and adjacent and close to numerous bus lines and mixed land uses (including housing, employment, and public space). As such, the proposed project would conform to the Air Quality Element.

Land Use Element

The General Plan Framework Land Use chapter designates Districts (i.e., Neighborhood Districts, Community Centers, Regional Centers, Downtown Centers, and Mixed-Use Boulevards) and provides policies applicable to each District to support the vitality of the City's residential neighborhoods and commercial districts.

The portion of MLK Blvd. that includes the proposed project site is designated in the Framework as a Mixed Use Boulevard.⁶⁶ This indicates a goal of a mix of housing and commercial in compatible heights and densities. It is a policy of the Framework Element to "Encourage the development of commercial uses and structures that integrate housing units with commercial uses." The proposed project would develop the site with commercial uses that would be integrated with housing along the portion of MLK Blvd. designated as a Mixed Use Boulevard.

The proposed project would require an amendment to the Community Plan map and a change in the zoning in order to extend commercial designations over the southeast portion of the east site and the two westernmost lots of the Development Site currently designated and zoned for residential. Specifically, the proposed project would require an amendment to the Community Plan's land use designation for just the two furthest west lots of Assessor's Parcel Number 5019-001-034 from the current "High Medium Residential" land use designation to the "Community Commercial" land use designation. In addition, Footnote 1 of the Community Plan's General Plan Land Use Map would be updated to allow Height District 2 at the entire proposed project site. Also, the proposed project would require a zone change and height district change from C2-1 and R3-1 to C2-2. It is a policy of the Land Use Chapter that the City should "Allow

64 Urban Land Institute, *Land Use and Driving: The Role Compact Development Can Play in Reducing Green House Gas Emissions, Evidence from Three Recent Studies* (2010), 4.

65 Urban Land Institute, *Land Use and Driving* (2010), 5.

66 City of Los Angeles, Planning Department, *The Citywide General Plan Framework: An Element of the City of Los Angeles General Plan*, Figure 3-2, Long Range Land Use Diagram: South Los Angeles.

amendments to the community plans and coastal plans to further refine General Plan Framework Element land use boundaries and categories to reflect local conditions, parcel characteristics, existing land uses, and public input.” As discussed below, relative to the policies of the Community Plan, the proposed Community Plan amendment and rezoning would adjust the land use boundaries to reflect local conditions, in that the Development Site has not been improved with residential uses for a number of decades.

Housing Element

The Housing chapter of the General Plan Framework presents an overview of the issues related to housing in Los Angeles and provides goals and policies to guide action.

The proposed project does not include housing; however, a portion of the site is currently designated on the Community Land Use Map for residential uses. The proposed project would require an amendment to the Community Plan map and a change in the zoning in order to extend a commercial use over the entire site. Specifically, the proposed project would require an amendment to the Community Plan’s land use designation for just the two furthest west lots of Assessor’s Parcel Number 5019-001-034 from the current “High Medium Residential” land use designation to the “Community Commercial” land use designation. In addition, Footnote 1 of the Community Plan’s General Plan Land Use Map would be updated to allow Height District 2 at the proposed project site. Also, the proposed project would require a zone change and height district change from C2-1 and R3-1 to C2-2. As discussed below, relative to the policies of the Community Plan, the proposed amendment and rezoning would support the overall policies of the Plan.

Open Space and Conservation Element

The proposed project would provide landscaping around the perimeter of both the East Structure and the West Structure to improve the walkability along MLK Blvd. As stated in Objective 4.2, parks and other open space lands were deficiencies exist such as South East and South Los Angeles neighborhoods that were developed prior to the adoption of the State Quimby Act of 1965, are encouraged. The landscaping associated with the proposed project would be consistent with this objective through the incorporation of approximately 31 palm trees along the East Structure and approximately 14 palm trees along the West Structure and would make a positive contribution to the neighborhood, where there is a current lack of consistent landscaping themes in the immediate vicinity.⁶⁷ The new space would enhance the neighborhood’s aesthetics.⁶⁸

67 *City of Los Angeles General Plan, “Open Space and Conservation Element,” Objective 4.2.*

68 *City of Los Angeles General Plan, “Open Space and Conservation Element,” Objective 4.2.*

Mobility Element

The proposed project is adjacent to MLK Blvd., a major transportation corridor providing substantial public transit opportunities and facilities, including Metro Local Bus Line 40. The proposed project is also approximately 0.75 miles southwest of existing Metro Silver and Expo stations.⁶⁹ The development of the proposed project with commercial uses would promote pedestrian activity and circulation, create direct pedestrian connections between the proposed project and the Metro transit infrastructure, and conform to the Mobility Element's policies and objectives. In addition, the proposed project includes dedications in compliance with the Mobility Element's requirements.

South Los Angeles Community Plan

The proposed project site is located within the Community Plan area of the City. The Community Plan map designates most of the proposed project site as Community Commercial with a portion of the western end of the proposed project site associated with Assessor's Parcel Number 5019-001-034 designated as High-Medium Residential. As the proposed project would be entirely commercial in nature, it would conflict with the portion of the site designated as High-Medium Residential. The Applicant has requested that the City amend the Community Plan land use map such that the entire proposed project site is within the "Community Commercial" land use designation.

The Community Plan includes the following policies relevant to the commercial uses in general:

- New commercial uses shall be located in existing, established commercial areas or existing shopping centers.
- Commercial areas should be consolidated and deepened to stimulate existing businesses, create opportunities for new development and off-street parking, expand the variety of goods and services, and improve shopping convenience as well as offer local employment.
- Require that projects be designed and developed to achieve a high level of quality, distinctive character, and compatibility with existing uses and development.
- Improve the appearance and landscaping of commercial properties.
- Preserve community character, scale and architectural diversity.
- Improve safety and aesthetics of parking areas in commercial areas.
- Protect commercial plan designations so that commercial development is encouraged.

The proposed project would be located in an existing commercial area. Portions of the proposed project site are currently zoned and designated in the plan as residential. One of the proposed project actions is to rezone and re-designate these portions of the proposed project site so that the entire proposed project

⁶⁹ *City of Los Angeles General Plan, "Transportation Element," Objective 3.5, Policy 3.12.*

site is commercial. This action furthers the policies of consolidating, deepening and protecting commercial areas. As such, the proposed project is consistent with these policies.

The Community Plan includes the following policies relevant specifically to the automotive uses:

- Prohibit the development of new automobile-related uses in Pedestrian Oriented Districts (PODs).
- Permit the development of new automobile-related uses in some commercial and industrial areas.
- Require screening of open storage and auto uses, and prohibit storage of automobile parts and other noxious commercial related products in front of commercial development, exposed to the street.

The proposed project is located along a major street, MLK Blvd., is designated as a commercial area and is not in a Pedestrian Oriented District. The design of the East Structure and the West Structure would screen the storage of automobiles and automobile servicing facilities. As such, the proposed project is consistent with these policies.

Based on the above, the proposed project would not conflict with the Community Plan.

Los Angeles Municipal Code

Development of the proposed project site is subject to the constraints of the Los Angeles Municipal Code (LAMC), especially Chapter I – the Planning and Zoning Code.

Most of the proposed project site is currently zoned C2, a commercial zone that permits a range of retail and commercial uses including the proposed uses. However, a portion of the site is zoned R3, a residential use. Because the proposed uses would conflict with the R3 zone, the Applicant has requested that the City rezone the R3 portion of the proposed project site to C2. This proposed project action would remove the conflict between the proposed uses and the zoning classification.

The proposed project site is currently classified as Height District 1, which permits a maximum floor-area-ratio (FAR) for commercial uses of 1.5:1. As proposed, the proposed project would have an FAR of 3.58 within the East Structure and 3.83 within the West. Because the East Structure and West Structure would conflict with the limitation of Height District 1, the Applicant has requested that the City rezone the proposed project site to Height District 2, which permits and FAR of 6:1. This proposed project action would remove the conflict between the proposed uses and the height district.

The East Structure and the West Structure are located more than 100 feet from the OS Zone. The East Structure would be approximately 68 feet, with an additional approximately 10 feet to account for elevator shafts, rooftop lights and equipment. The West Structure would be approximately 54 feet, with an additional approximately 12 feet to account for elevator shafts, rooftop lights and equipment.

Commercially zoned properties in Height District 2 have no absolute limit on height or stories. However, the proposed project site is subject to a transitional height limitation, which permits maximum 61-foot building heights for commercially zoned properties located 100 to 199 feet from an OS zoned lot. Because the East Structure and West Structure would conflict with the transitional height limitation, the Applicant has requested a Zoning Administrator Determination to permit a transitional height increase for the East Structure and the West Structure pursuant to section 12.24X22 of the LAMC. This proposed project action would remove the conflict between the proposed uses and the height limitations. Therefore, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

c. *Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?*

No Impact. A significant adverse effect could occur if a project site was located within an area governed by a habitat conservation plan or natural community conservation plan. As discussed previously, no such plans presently exist that govern any portion of the proposed project site. Further, the proposed project site is located in an area that is already fully developed with residential and commercial uses, within a heavily urbanized area of Los Angeles. Therefore, the proposed project would not have the potential to cause such effects. Thus, no impacts would occur.

Mitigation Measures: No mitigation measures are necessary.

Cumulative Impacts

Less than Significant Impact. Development of any related project is expected to occur in accordance with adopted plans and regulations. It is also expected that most of the related projects would be compatible with the zoning and land use designations of each related project site and its existing surrounding uses. In addition, it is reasonable to assume that the projects under consideration in the surrounding area would implement and support local and regional planning goals and policies. The proposed project's land use impacts would not be cumulatively considerable since the proposed project would not conflict with applicable local or regional plans. Thus, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

4.11 MINERAL RESOURCES

Impact Analysis

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

No Impact. A significant impact may occur if a project site is located in an area used or available for extraction of a regionally important mineral resource, or if the project development would convert an existing or future regionally important mineral extraction use to another use, or if the project development would affect access to a site used or potentially available for regionally important mineral resource extraction. According to the LA CEQA Thresholds Guide, the determination of significance shall be made on a case-by-case basis, considering (a) whether, or the degree to which, the project might result in the permanent loss of, or loss of access to, a mineral resource that is located in a State Mining and Geology Board Mineral Resource Zone 2 (MRZ-2) Area, or other known or potential mineral resource area, and (b) whether the mineral resource is of regional or Statewide significance, or is noted in the Conservation Element as being of local importance.

The proposed project site is not located within a MRZ-2 Area, an Oil Drilling/Surface Mining Supplemental Use District, or an Oil Field/Drilling Area.⁷⁰ No mineral resources are known to exist beneath the proposed project site. Thus, no impacts associated with the loss of availability of a known mineral resource would occur.

Mitigation Measures: No mitigation measures are necessary.

- 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. As noted above, the proposed project site is not located within an MRZ-2 Area.⁷¹ The proposed project site is not delineated as a mineral resource recovery site on a local general plan, specific plan or other land use plan. Thus, no impacts would occur.

Mitigation Measures: No mitigation measures are necessary.

70 City of Los Angeles Department of City Planning, *Environmental and Public Facilities Map* (September 1996).

71 City of Los Angeles Department of City Planning, *Environmental and Public Facilities Map* (September 1996).

Cumulative Impacts

No Impact. Section 15355 of the *CEQA Guidelines* defines cumulative impacts as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” As discussed previously, the proposed project would have no impact on mineral resources. It is not known if any of the 12 related projects would result in the loss of availability of known mineral resources. Regardless, the proposed project would have no incremental contribution to the potential cumulative impact on mineral resources. Thus, no impact would occur.

Mitigation Measures: No mitigation measures are necessary.

4.12 NOISE

Impact Analysis

- a. Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

Potentially Significant Impact Unless Mitigation Incorporated. A significant impact may occur if a project would generate excess noise that would cause the ambient noise environment at the project site to exceed noise level standards set forth in the City's General Plan Noise Element (Noise Element) and the City's Noise Ordinance ("Noise Ordinance"). Implementation of the proposed project would result in an increase in ambient noise levels during both construction and operation, as discussed in further detail below.

Construction

Construction of the proposed project would utilize heavy equipment for demolition, site clearing, excavation, foundation preparation, building construction and utility connections. During each construction phase there would be a different mix of equipment operating and noise levels would vary based on the amount of equipment in operation and the location. It should be noted that increases in noise levels during construction would be temporary and intermittent in nature.

The LA CEQA *Thresholds Guide* states that a significant construction noise impact could occur if construction activities lasting more than one day would increase the ambient noise levels by 10 dB(A) or more at a noise-sensitive location and construction activities lasting more than 10 days in a three-month period would increase ambient noise levels by five dB(A) or more at a noise-sensitive location.

In addition, construction-related noise impacts could be significant if, as indicated in Section 112.05 of the LAMC, noise from construction equipment within 500 feet of a residential zone exceeds 75 decibels (dB[A]) at a distance of 50 feet from the noise source. However, this noise limitation does not apply where compliance is technically infeasible. "Technically infeasible" means that the above noise limitation cannot be complied with despite the use of mufflers, shields, sound barriers and/or any other noise reduction device or techniques during the operation of the equipment.

Section 41.40 of the LAMC regulates noise from demolition and construction activities. Exterior demolition and construction activities that generate noise are prohibited between the hours of 9:00 PM and 7:00 AM Monday through Friday, and between 6:00 PM and 8:00 AM on Saturday. Demolition and construction are prohibited on Sundays and all federal holidays. The construction activities associated with the proposed project would comply with these LAMC requirements.

The residential uses adjacent to the proposed project site are noise sensitive receptors. To identify the existing ambient noise levels at these sensitive receptors as well as the general vicinity of the proposed project site, noise measurements were collected along 40th Place south of the proposed project site, east of Hoover St. and along MLK Blvd. along the northern side of the proposed project site, west of Hoover. As shown in **Table 4.12-1, Existing Ambient Noise Levels in Project Site Vicinity**, hourly noise levels ranged from 66.6 to 76.0 dB(A) along 40th Place and from 54.4 to 65.2 dB(A) along MLK Blvd.

Table 4.12-1
Existing Ambient Noise Levels in Project Site Vicinity

Location	Primary Noise Sources	Leq	Lmin	Lmax
North side of 40th Place east of Hoover Street	Traffic	61.6	37.1	87.1
South side of Martin Luther King Jr. Boulevard west of Hoover Street.	Traffic; bus stop	73.1	39.9	100.4

Source: Noise monitoring data sheets can be seen in Appendix E.

As shown in **Table 4.12-2, Typical Outdoor Construction Noise Levels**, construction noise during the heavier initial periods of construction is presented as 86 dB(A) Leq when measured at a reference distance of 50 feet from the center of construction activity.⁷² These noise levels would diminish rapidly with distance from the construction site at a rate of approximately six dB(A) per doubling of distance. For example, a noise level of 86 dB(A) Leq measured at 50 feet from the noise source to the receptor would reduce to 80 dB(A) Leq at 100 feet from the source to the receptor, and reduce by another six dB(A) Leq to 74 dB(A) Leq at 200 feet from the source to the receptor.

⁷² Although the peak noise levels generated by certain construction equipment may be greater than 86 dB(A) at a distance of 50 feet, the equivalent noise level would be approximately 86 dB(A) Leq (i.e., the equipment does not operate at the peak noise level over the entire duration).

Table 4.12-2
Typical Outdoor Construction Noise Levels

Construction Phase	Approximate L_{eq} dB(A) with Mufflers			
	50 Feet	60 Feet	100 Feet	200 Feet
Ground clearing	82	80	76	70
Excavation, grading	86	84	80	74
Foundations	77	75	71	65
Structural	83	81	77	71
Finishing	86	84	80	74

Source: US Environmental Protection Agency, *Noise from Construction Equipment and Operations, Building Equipment and Home Appliance*, EPA-68-04-0047 (1971).

Based on the results shown in **Table 4.12-3, Estimated Exterior Construction Noise at Nearest Sensitive Receptors**, the ambient exterior noise levels at the nearest sensitive receptors could be exceeded by five dB(A) or more. Therefore, based on the criteria established in the *LA CEQA Threshold Guide*, a substantial temporary or periodic increase in ambient noise levels would occur at the nearby sensitive receptors. It should be noted that noise levels 50 feet from the source would generate up to 86 dB(A) at noise sensitive receptors.

Table 4.12-3
Estimated Exterior Construction Noise at Nearest Sensitive Receptor

Sensitive Land Use	Distance from Project Site	Existing Monitored Daytime Ambient Noise Levels (dB[A] L_{eq}) ^a	Estimated Peak	
			Construction Noise Levels (dB[A] L_{eq})	Noise Level Increase (dB[A] L_{eq})
West of proposed project site	10 feet	66.6-76.0	98	31.4-22.0
East of proposed project site	10 feet	61.4-65.2	98	36.6-32.8

Source: Noise monitoring data sheets can be seen in **Appendix E, Noise Background Data**.

^a Measured hours between 7:00 AM and 9:00 PM.

Pursuant to the City's Noise Ordinance, construction noise levels are exempt from the 75 dB(A) noise threshold if all technically feasible noise attenuation measures are implemented. The estimated construction-related noise levels associated with the proposed project could exceed the numerical noise threshold of 75 dB(A) at 50 feet from the noise source as outlined in the City's Noise Ordinance. The typical construction noise levels associated with the proposed project would exceed the existing ambient noise

levels along 40th Place at the identified off-site sensitive receptors by more than the five dB(A) threshold established by the LA CEQA *Thresholds Guide* during all construction phases. Implementation of the following mitigation measure would reduce the noise levels associated with construction of the proposed project to the maximum extent that is technically feasible. The measure would ensure that (1) the construction equipment would be scheduled to avoid operating several pieces of equipment simultaneously to the extent feasible; and (2) construction equipment would be equipped with noise-shielding and muffling devices to the extent feasible. On average, muffling devices typically reduce noise levels by two dB(A). Prior to commencement of construction, install along the proposed project site's western, southern and eastern boundary sound curtains or an equivalent sound attenuating device capable of achieving a 10 dB reduction at these locations.⁷³ Noise levels at 10 feet from adjacent sensitive receptors would be up to 86 dB(A) for only short-term, temporary periods. However, the noise standard is based on 50 feet from the noise source. The resulting construction-related noise levels would be up to 74 dB(A) at 50 feet from construction equipment at nearby sensitive receptors. Thus, based on the provisions set forth in LAMC 112.05, implementation of Mitigation Measure MM XII-20 would ensure impacts associated with construction-related noise levels are mitigated to the maximum extent feasible and temporary construction noise impacts would be considered less than significant.

Mitigation Measures: The following mitigation measure shall be implemented to reduce impacts to a less than significant level.

MM XII-20 Increased Noise Levels (Demolition, Grading, and Construction Activities)

- The proposed project shall comply with the City Noise Ordinance No. 144,331 and 161,574, and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.
- Demolition and construction activities shall, to the extent feasible, be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.
- The proposed project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices, to the extent feasible.
- Sound curtains or an equivalent sound attenuating device capable of achieving a 10 dB reduction shall be placed along the northern, southern, and western property boundary prior to commencement of construction. The sound curtain or equivalent

73 Based on a review of Table 4 of the *FHWA Noise Barrier Design Handbook* (July 14, 2011), the design feasibility of a sound barrier that reduces noise by five dB(A) is considered "simple" and a reduction of up to 10 dB(A) as "attainable."

sound attenuating device shall be engineered and erected according to applicable codes.

Operation

Noise would be generated by activities within the West Structure associated with the proposed project. Dealership uses and aboveground parking would be provided for storage of new vehicles associated with the dealership. Sources of noise within the West Structure would include engines accelerating, doors slamming, car alarms, and people talking. Noise levels within the parking areas would fluctuate with the amount of automobile and human activity. Vehicles would only come and go during regular business hours. Given that the parking levels serving the proposed project would include enclosures, noise generated at these levels would likely be imperceptible at ground level locations on and adjacent to the proposed project site. As is typical for commercial-use buildings, cars entering and exiting the West Structure at all hours of the day can become a nuisance to occupants of the adjacent residential buildings. Mitigation Measure XII-40 would be implemented to reduce noise levels generated from parking ramps and the parking structure adjacent to residential uses.

The East Structure would include auto repair and car wash services on the upper levels. As such, the proposed project driveway ramps would be constructed of noise-attenuating materials such as concrete surfaces and textured to minimize tire squeal. In addition, level three which would include a car wash and level 4, which would contain the car service bays, would be enclosed to lessen any noise operational impacts. Automobile services typically generate short term noise levels up to 85 dB(A) approximately 50 feet from the source. Car wash facilities, which include blowers to dry vehicles, generate noise levels up to 79 dB(A) approximately 20 feet from the source. Typical construction materials used for the structure attenuate sound approximately 25 dB(A). Noise levels from automobile and car wash services would be approximately 60 dB(A) and 54 dB(A), respectively. As indicated in **Table 4.12-3**, ambient noise levels in the proposed project vicinity range between 61 to 76 dB(A). With implementation of these standard conditions in addition to Mitigation Measures MM XII-40 and MM XII-80, noise impacts associated with the proposed project would be reduced to ensure operational noise impacts are less than significant.

HVAC Equipment

Upon completion and operation of the proposed project, on-site operational noise would be generated by heating, ventilation, and air conditioning (“HVAC”) equipment installed on the proposed project site. Although the existing structure on the proposed project site is vacant, and the development of East Structure and West Structure would result in an increased use of HVAC equipment, today’s equipment is significantly quieter than what was utilized in the recent past. New HVAC units typically generate noise levels up to 76 decibels at the source. Typical noise reduces approximately eight decibels three feet from

the unit, 14 decibels approximately six feet from the unit, and up to 32 decibels approximately 45 feet from the unit.⁷⁴ Noise levels from on-site HVAC units would generate 44 dB(A) approximately 45 feet from the unit, lower than measured ambient noise levels. In addition, the on-site equipment would be designed such that it would be shielded and with no direct line of sight to sensitive uses, and appropriate noise-muffling devices would be installed on the equipment to reduce noise levels that affect nearby uses. Therefore, noise levels generated by HVAC equipment are not anticipated to be substantially greater than those generated by current HVAC equipment serving existing buildings in the proposed project vicinity. As such, the HVAC equipment associated with the proposed project would not represent a significant new source of noise in the proposed project vicinity. The operation of this and any other on-site stationary sources of noise would be required to comply with Section 112.02 of the LAMC, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than five decibels. Thus, impacts associated with mechanical equipment would be reduced to less than significant levels through code compliance measures.

Exposure to Ambient Noise Levels

Noise would be generated by activities within the proposed project site, including vehicles traveling to the site, engines accelerating, doors slamming, car alarms, and people talking. Noise levels within the parking areas would fluctuate with the amount of automobile and human activity. The proposed project site is bordered by active roadways and, based on comparative traffic volumes, the trips associated with the proposed project would not substantially change the existing level of traffic noise, as discussed below. Additionally, the proposed project's third level car wash facility and fourth level service department facilities would generate increased noise levels within the East Structure. In order to minimize spillover noise associated with the car wash facility and service department facilities, the proposed project would incorporate various building materials to screen any generated noise. Furthermore, the service department facilities would be located within the enclosed level of the East Structure with no openings permitted adjacent to residential uses, as described in Mitigation Measure MM XII-80. Typical construction materials reduce noise levels approximately 25 dB. Accordingly, noise levels generated by the car wash facility and service department facilities would be maintained within the building and would not substantially increase the ambient noise levels adjacent to residential uses. Based on the above, operational impacts would be less than significant.

74 ANSI/AHRI Standard 275-2010, Application of Outdoor Unitary Equipment A-Weighted Sound Power Ratings, Table 4, Distance Factor.

Mitigation Measures: The following mitigation measures shall be implemented to reduce impacts to a less than significant level.

MM XII-40 Increased Noise Levels (Parking Structure Ramps):

Environmental impacts adjacent to residential properties may result from proposed project implementation due to noise from cars using the parking ramp. However, the potential impacts will be mitigated to a less than significant level by the following measures:

- Concrete, not metal, shall be used for construction of parking ramps.
- The interior ramps shall be textured to prevent tire squeal at turning areas.
- Parking lots located adjacent to residential buildings shall have a solid decorative wall adjacent to the residential.

MM XII-80 Increased Noise Levels (Auto-Repair Garage):

Environmental impacts adjacent to residential properties may result from proposed project implementation due to mobile noise from the auto-repair garage. However, these impacts will be mitigated to a less than significant level by the following measure:

- No openings shall be permitted on any building façade which abuts a residential use or zone.

b. Would the project result in exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels?

Potentially Significant Impact Unless Mitigation Incorporated. Vibration is sound radiated through the ground. The peak particle velocity (“PPV”) or the root mean square (“RMS”) velocity is usually used to describe vibration levels. PPV is defined as the maximum instantaneous peak of the vibration level, while RMS is defined as the square root of the average of the squared amplitude of the level. PPV is typically used for evaluating potential building damage, while RMS velocity in decibels (“VdB”) is typically more suitable for evaluating human response.

The background vibration velocity level in residential areas is usually around 50 VdB. The vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for most people. Most perceptible indoor vibration is caused by sources within buildings such as operation of mechanical

equipment, movement of people, or slamming of doors. Typical outdoor sources of perceptible groundborne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the groundborne vibration from traffic is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings.

Construction

Construction activities for the proposed project have the potential to generate low levels of groundborne vibration. The operation of construction equipment generates vibrations that propagate through the ground but diminishes in intensity with distance from the source. Vibration impacts can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage of buildings at the highest levels. The construction activities associated with the proposed project could have an adverse impact on both sensitive structures (e.g., building damage) and populations (e.g., annoyance).

In terms of construction-related impacts on buildings, the City has not adopted policies or guidelines relative to groundborne vibration. While the Los Angeles County Code (LACC Section 12.08.350) states a presumed perception threshold of 0.01 inch per second RMS, this threshold applies to groundborne vibrations from long-term operational activities, not construction. Consequently, as both the City and the County of Los Angeles do not have a significance threshold to assess vibration impacts during construction, the Federal Transit Administration (“FTA”) and California Department of Transportation’s (“Caltrans”) adopted vibration standards for buildings are used to evaluate potential impacts related to project construction. Based on the FTA and Caltrans criteria, construction impacts relative to groundborne vibration would be considered significant if the following were to occur:⁷⁵

- Project construction activities would cause a PPV groundborne vibration level to exceed 0.5 inches per second (“ips”) at any building that is constructed with reinforced concrete, steel, or timber.
- Project construction activities would cause a PPV groundborne vibration level to exceed 0.3 ips at any engineered concrete and masonry buildings.
- Project construction activities would cause a PPV groundborne vibration level to exceed 0.2 ips at any nonengineered timber and masonry buildings.
- Project construction activities would cause a PPV groundborne vibration level to exceed 0.12 ips at any historical building or building that is extremely susceptible to vibration damage.

75 Federal Transit Administration, *Transit Noise and Vibration Impact Assessment* (May 2006); and California Department of Transportation, *Transportation- and Construction-Induced Vibration Guidance Manual* (June 2004).

In addition, the City has not adopted any thresholds associated with human annoyance for groundborne vibration impacts. Therefore, this analysis uses the FTA's vibration impact thresholds for human annoyance. These thresholds include 80 VdB at residences and buildings where people normally sleep (e.g., nearby residences) and 83 VdB at institutional buildings, such as schools and churches. No thresholds have been adopted or recommended for commercial and office uses.

Table 4.12-4, Vibration Source Levels for Construction Equipment, identifies various PPV and RMS velocity (in VdB) levels for the types of construction equipment that would operate at the proposed project site during construction.

Table 4.12-4
Vibration Source Levels for Construction Equipment

Equipment	Approximate PPV (in/sec)					Approximate RMS (VdB)				
	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet
Caisson Drilling	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Loaded Trucks	0.076	0.027	0.020	0.015	0.010	86	77	75	72	68
Excavator	0.040	0.014	0.011	0.008	0.005	80	71	69	66	62
Jackhammer	0.035	0.012	0.009	0.007	0.004	79	70	68	65	61
Small Bulldozer	0.003	0.001	0.0008	0.0006	0.0004	58	49	47	44	40

Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, Final Report, 2006.

Although the identified historic residence to the west of the proposed project site is located within 25 feet of the proposed project site (approximately 10 feet from excavator activities), vibration levels could reach 0.158 PPV at this residence. As discussed previously, the most restrictive threshold for building damage from vibration is 0.12 PPV for historic buildings and buildings that are extremely susceptible to vibration damage. Implementation of Mitigation Measure XII-20 shall limit the time pneumatic tools and excavators are used to break up the existing pavement adjacent to the residence east of the site. All other residences would be subject to the nonengineered and masonry building threshold of 0.20 PPV. Therefore, vibration levels at the existing residences would not exceed the building damage threshold from vibration. Furthermore, vibration levels at distances greater than 25 feet from the proposed project site boundary, would not exceed 0.089 PPV for the receptors southwest, south, and southeast of the proposed project site (as indicated in **Table 4.12-4**). As maximum off-site vibration levels would not exceed 0.20 PPV, there would be no potential for proposed project construction to result in vibration levels exceeding the most restrictive threshold of significance. Impacts with respect to building damage resulting from proposed project-generated vibration would be less than significant.

In terms of human annoyance resulting from vibration generated during construction, the multifamily residential use located west and east of the proposed project site could be exposed to increased vibration levels. As identified in **Table 4.12-4**, construction-generated vibration levels experienced at this residential use would exceed the 80 VdB thresholds for the residential uses. Construction activities would occur during daytime hours and outside of regular sleeping hours. Sensitive uses to the south of the proposed project site would not experience vibration levels above the 80 VdB threshold. As such, the proposed project would comply with the City's Noise Ordinance, and any subsequent ordinances, prohibiting the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible. With the implementation of Mitigation Measure MM-XII-20, construction impacts would be less than significant.

Operation

The proposed project would not involve the use of stationary equipment that would result in high vibration levels, which are more typical for large commercial and industrial projects. Although groundborne vibration at the proposed project site and immediate vicinity could occur from heavy vehicle traffic (e.g., automobile delivery trucks) it is not expected that the truck usage on MLK Blvd. would be substantially different than present usage of that roadway. Operational impacts would be less than significant.

Mitigation Measures: Mitigation Measure MM-XII-20 shall be implemented to reduce construction impacts to a less than significant level.

c. Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Less than Significant Impact. A significant impact could occur if a project resulted in a substantial permanent increase in ambient noise compared to ambient noise levels without the project. As defined in the *LA CEQA Thresholds Guide* threshold for operational noise impacts, a project would normally have a significant impact on noise levels from project operations if the project causes the ambient noise level measured at the property line of affected uses that are shown in **Table 4.12-5, Community Noise Exposure Levels (CNEL)**, to increase by three dB(A) in CNEL to or within the "normally unacceptable" or "clearly unacceptable" category, or any five dB(A) or greater noise increase.

**Table 4.12-5
Community Noise Exposure Levels (CNEL)**

Land Use	Normally Acceptable^a	Conditionally Acceptable^b	Normally Unacceptable^c	Clearly Unacceptable^d
Single-family, duplex, mobile homes	50–60	55–70	70–75	above 75
Multifamily homes	50–65	60–70	70–75	above 75
Schools, libraries, churches, hospitals, nursing homes	50–70	60–70	70–80	above 80
Transient lodging—motels, hotels	50–65	60–70	70–80	above 75
Auditoriums, concert halls, and amphitheatres	—	50–70	—	above 70
Sports arena, outdoor spectator sports	—	50–75	—	above 75
Playgrounds, neighborhood parks	50–70	—	67–75	above 75
Golf courses, riding stables, water recreation, cemeteries	50–75	—	70–80	above 80
Office buildings, business, and professional commercial	50–70	67–77	above 75	—
Industrial, manufacturing, utilities, agriculture	50–75	70–80	above 75	—

Source: Office of Planning and Research, State of California General Plan Guidelines (in coordination with the California Department of Health Services) (October 2003); City of Los Angeles, General Plan Noise Element, adopted February 1999.

^a **Normally Acceptable:** Specified land use is satisfactory, based on the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

^b **Conditionally Acceptable:** New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning, will normally suffice.

^c **Normally Unacceptable:** New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and necessary noise insulation features included in the design.

^d **Clearly Unacceptable:** New construction or development should generally not be undertaken.

Thus, a significant impact would occur if noise levels associated with operation of a proposed project would increase the ambient noise levels by three dB(A) CNEL at homes where the resulting noise level would be at least 70 dB(A) CNEL. In addition, any long-term increase of five dB(A) CNEL or more is considered to cause a significant impact. To achieve a three dB(A) CNEL increase in ambient noise from traffic, the volume on any given roadway would need to double. In addition to analyzing potential impacts in terms of CNEL, the analysis also addresses increases in on-site noise sources per the provisions of the LAMC, which establishes a Leq standard of five dB(A) over ambient conditions as constituting a LAMC violation.

For a new noise source to be audible, there would need to be a three dB(A) or greater CNEL noise increase. As discussed above, the traffic volume on any given roadway segment would need to double as a result of

the proposed project for a three dB(A) increase in ambient noise to occur.⁷⁶ According to the LA CEQA *Thresholds Guide*, if a project would result in traffic that is less than double the existing traffic, then the project's mobile noise impacts can be assumed to be less than significant.

As described in **Section 4.16 Traffic and Transportation**, the proposed project would result in a net increase of 1,133 daily vehicle trips and peak-hour maximums of 79 AM and 108 PM trips. According to the City's Department of Transportation, daily trip volumes on MLK Blvd. in June 2014 were measured over 42,000 with maximum peak-hour volumes over 3,000. As discussed in **Section 4.16**, the V/C ratio at all of the study intersections would incrementally, but not significantly, increase (less than a two percent increase at each studied intersection) with the addition of ambient traffic, related project traffic, and proposed project traffic. Therefore, the proposed project would not have the potential to double the traffic volumes on any roadway segment near the proposed project site, and therefore would not have the potential to increase roadway noise levels by three dB(A). Traffic-generated noise impacts would be considered less than significant.

Operational Noise—Stationary Noise Sources

The long-term operation of the proposed project would generate noise associated with mechanical HVAC equipment, vehicles entering and exiting, car wash facility, and automobile service activities. The design of building equipment would be required to comply with Section 112.02 of the LAMC, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than five decibels. With regard to vehicle noise, Section 114.02 of the LAMC prohibits the operation of any motor-driven vehicles on any property within the City such that the created noise would cause the noise level on the premises of any occupied residential property to exceed the ambient noise level by more than five decibels. Automobile services typically generate short term noise levels up to 85 dB(A) approximately 50 feet from the source. Car wash facilities, which include blowers to dry vehicles, generate noise levels up to 79 dB(A) approximately 20 feet from the source. As described in the Project Description, the automobile and car wash services would be enclosed within the East Structure. Typical construction materials used for the structure attenuate sound approximately 25 dB(A). Noise levels from automobile and car wash services would be approximately 60 dB(A) and 54 dB(A), respectively. As indicated in Table **4.12-3**, ambient noise levels in the proposed project vicinity range between 61 to 76 dB(A). Given the level of existing traffic-related noise along MLK Blvd., operational noise associated would not substantially increase ambient noise level. Impacts would be less than significant.

⁷⁶ Doubling the sound power increases the sound power level by three decibels. US Department of Labor, Occupational Safety and Health Administration, *Noise and Hearing Conservation Technical Manual*, accessed at https://www.osha.gov/dts/osta/otm/noise/health_effects/soundpropagation.html.

Mitigation Measures: No mitigation measures are necessary.

- d. *Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?***

Potentially Significant Impact Unless Mitigation Incorporated. As discussed in subsection 4.12(a) substantial increases in ambient noise levels are likely during construction. Noise levels at 10 feet from adjacent sensitive receptors would be up to 86 dB(A) for only short-term, temporary periods. However, the noise standard is based on 50 feet from the noise source. The resulting construction-related noise levels would be up to 74 dB(A) at 50 feet from construction equipment at nearby sensitive receptors. Thus, based on the provisions set forth in LAMC 112.05, implementation of Mitigation Measure MM XII-20 would ensure impacts associated with construction-related noise levels are mitigated to the maximum extent feasible and temporary construction noise impacts would be considered less than significant.

Mitigation Measures: See Mitigation Measure MM-XII-20 identified in subsection 4.12(a) above.

- 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 expose people residing or working in the project area to excessive noise levels?***

No Impact. A significant impact may occur if a project was located within an airport land use plan and would introduce substantial new sources of noise or substantially add to existing sources of noise within or near a project site. There are no airports within a two-mile radius of the proposed project site, nor is the proposed project site within any airport land use plan or airport hazard zone. The proposed project would not expose people to excessive noise levels associated with airport uses. Thus, no impact would occur.

Mitigation Measures: No mitigation measures are necessary.

- f. *For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?***

No Impact. This question would apply to a project only if it were in the vicinity of a private airstrip and would subject area residents and workers to a safety hazard. The closest private airport is Quail Lake Sky Park Airport in Lancaster, approximately 77 miles northwest of the proposed project site. Thus, no impact would occur.

Mitigation Measures: No mitigation measures are necessary.

Cumulative Impacts

Potentially Significant Impact Unless Mitigation Incorporated. Development of the proposed project in conjunction with the 12 related projects would result in an increase in construction-related and traffic-related noise as well as on-site stationary noise sources in the already urbanized South Los Angeles area of the City. However, the Applicant has no control over the timing or sequencing of the related projects that have been identified within the proposed project study area. Any quantitative analysis that assumes multiple concurrent construction projects would be speculative. Construction-period noise for the proposed project and each related project (that has not yet been built) would be localized. In addition, each of the related projects would be required to comply with the City's Noise Ordinance, as well as mitigation measures similar to Mitigation Measure XII-20 that may be prescribed pursuant to CEQA provisions that require potentially significant impacts to be reduced to the extent feasible.

With respect to cumulative traffic noise impacts, it should be noted that the proposed project's mobile source vehicular noise impacts are based on the predicted traffic volumes as presented in the proposed project Traffic Study. Thus, the future predicted noise levels include the traffic volumes from the proposed project and future traffic levels associated with ambient growth and the related projects. Based on the proposed project's estimated trip generation and related projects that would have the potential to increase traffic along roadways near the proposed project site, noise levels would incrementally, but not significantly, increase (less than a two percent increase at each studied intersection) with the addition of ambient traffic, related project traffic, and proposed project traffic. The proposed project would not have the potential to double the traffic volumes on any roadway segment near the proposed project site, and therefore would not have the potential to increase roadway noise levels by three dB(A).

As such, the proposed project's noise volumes would not be cumulatively considerable. Thus, the cumulative impact associated with noise would be less than significant.

Mitigation Measures: Mitigation measures for the 12 related projects would be comparable to the mitigation measure for the proposed project.

4.13 POPULATION AND HOUSING

Impact Analysis

- a. *Would the project induce substantial 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)?***

No Impact. A significant impact could occur if a project would locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing growth in the proposed area that would otherwise not have occurred as rapidly or in as great a magnitude. Based on the LA CEQA *Thresholds Guide*, the determination of whether a project could result in a significant impact shall consider (a) the degree to which a project would cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of project occupancy/build-out, and would result in an adverse physical change in the environment; (b) whether the project would introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan; and (c) the extent to which growth would occur without implementation of the project.

The proposed project does not include any housing. While the proposed project would be a source of employment both during construction and operations, Honda of Downtown Los Angeles is an existing business with existing employees. While new employment opportunities are possible, the scale of opportunities is not large enough to induce regional growth. As such, no impact on population growth would occur.

Mitigation Measures: No mitigation measures are necessary.

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

No Impact. A significant impact could occur if a project would result in the displacement of existing housing units, necessitating the construction of replacement housing elsewhere. No housing currently exists on the site. As such, no impact would occur.

Mitigation Measures: No mitigation measures are necessary.

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

No Impact. A significant impact could occur if a project would result in the displacement of a substantial number of people, necessitating the construction of replacement housing elsewhere. Substantial numbers of people do not reside on the proposed project site. Thus, no impact would occur.

Mitigation Measures: No mitigation measures are necessary.

Cumulative Impacts

Less than Significant Impact. Approximately 12 related projects are currently planned for development within the Community Plan area. These projects would introduce additional residential, hotel, institutional, commercial, retail, restaurant, office, and entertainment industry uses to the City. Any residential projects would result in population growth in the City, while other types of related projects could result in indirect population growth. As shown in **Table 4.13-1, Projected Cumulative Housing Units**, the related projects would consist of residential developments that would cumulatively contribute approximately 365 new residential dwelling units and up to 1,216 new residents to the City.⁷⁷

**Table 4.13-1
Projected Cumulative Housing Units**

Related Projects (by Housing Type)	Total Housing Units	Total Residents^a
Apartments	365	1,216
<i>Related Projects Total</i>	365	1,216
Proposed Project Total	0	0
Cumulative Total	365	1,216

Note: For the full list of related projects please refer to **Table 2.0-1, Related Projects List**.

^a Based on a generation rate of 3.33 residents per dwelling units. Los Angeles Department of City Planning Demographic Research Unit, *South Los Angeles Community Plan Area (2009)*.

As discussed previously, the proposed project would not exceed the growth projections of SCAG's RCP or the 2012 RTP/SCS for the City subregion. In addition, the proposed project is the type of project encouraged by SCAG and City policies to develop an underdeveloped site within an existing urban setting

⁷⁷ Based on a generation rate of 3.33 residents per dwelling units. Los Angeles Department of City Planning Demographic Research Unit, *South Los Angeles Community Plan Area (2009)*.

and are close to existing mass transit. Thus, the proposed project's population growth would not be cumulatively considerable and impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

4.14 PUBLIC SERVICES

Impact Analysis

a. 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:

i. Fire protection

Potentially Significant Impact Unless Mitigation Incorporated. Based on the LA CEQA Thresholds Guide, a project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service. The City of Los Angeles Fire Department (“LAFD”) considers fire protection services for a project adequate if a project is within the maximum response distance for the land use proposed of an existing fire station. Pursuant to LAMC Section 57.09.07A, the maximum response distance for commercial uses is one mile. The nearest LAFD station is located at 4370 Hoover St., 0.5 miles to the south of the proposed project site. The average EMS response time is five minutes six seconds, and the average fire response time is four minutes fourteen seconds.⁷⁸ Based on the response distance criteria specified in LAMC 57.09.07A and the relatively short distance from the 4370 Hoover St. Fire Station to the proposed project site, fire protection response would be considered adequate.

The required fire flow necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard. Pursuant to LAMC Section 57.09.06, City-established fire flow requirements vary from 2,000 gallons per minute (“gpm”) in low-density residential areas to 12,000 gpm in high-density commercial or industrial areas. In any instance, a minimum residual water pressure of 20 pounds per square inch (“psi”) is to remain in the water system while the required gallons per minute are flowing. Any potential changes in existing hydrants along the proposed project frontage would be reviewed by the LAFD prior to site plan approval. Furthermore, the adequacy of existing water pressure and availability in the proposed project area with respect to required fire flow would be determined by LAFD during the plan check review process. As such, implementation of Regulatory Compliance Measure RC-WS-1 would ensure adequate fire flows to the proposed project site.

78 City of Los Angeles Fire Department (LAFD), (2015).

Regulatory Compliance Measure RC-WS-1 (Fire Water Flow): The project Applicant shall consult with the LADBS and LAFD to determine fire flow requirements for the project, and will contact a Water Service Representative at the LADWP to order a Service Advisory Report (SAR). This system of hydraulic analysis will determine if existing LADWP water supply facilities can provide the proposed fire flow requirements of the project. If water main or infrastructure upgrades are required, the Applicant shall pay for such upgrades, which shall be constructed by either the Applicant or LADWP.

In addition, the proposed project would include the incorporation of Mitigation Measure MM-XIV-10, which would include the submittal of a plot plan for LAFD approval. With the implementation of Regulatory Compliance Measure RC-WS-1 and Mitigation Measure MM-XIV-10, impacts would be less than significant.

Mitigation Measures: The following mitigation measure shall be implemented to reduce impacts to a less than significant level.

MM XIV-10 Public Services (Fire)

- The following recommendations of the Fire Department relative to fire safety shall be incorporated into the building plans, which includes the submittal of a plot plan for approval by the Fire Department prior to the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant, and entrances to any dwelling unit or guest room shall be no more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.

Cumulative Impacts

Potentially Significant Impact Unless Mitigation Incorporated. The proposed project, in combination with the 12 related projects, could increase the demand for fire protection services in the proposed project area. Specifically, there could be increased demands for additional LAFD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (e.g., property taxes, government funding, and developer fees) to which the proposed project and related projects would contribute. Similar to the proposed project, each of the related projects would be individually subject to LAFD review and would be required to comply with all applicable fire safety requirements of the LAFD and any mitigation similar to Mitigation Measure XIV-10 to adequately mitigate fire protection impacts. To the extent cumulative development causes the need for additional fire stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas and would not likely cause a significant impact upon the environment. Nevertheless, the siting and development on any new fire stations would be subject to further CEQA review and evaluated on a case-by-case basis. However, as the

LAFD does not currently have any plans for the development of new fire stations in proximity to the proposed project site, no impacts are currently anticipated to occur. On this basis, the proposed project would not make a cumulatively considerable contribution to fire protection services impacts and impacts would be less than significant with mitigation.

Mitigation Measures: Mitigation measures for the 12 related projects would be comparable to the mitigation measure for the proposed project. Therefore, with implementation of Mitigation Measure MM XIV-10 no additional proposed project mitigation measures are necessary.

ii. Police Protection.

Potentially Significant Impact Unless Mitigation Incorporated. A significant impact may occur if the City of Los Angeles Police Department (“LAPD”) could not adequately serve a project without necessitating a new or physically altered station, the construction of which may cause significant environmental impacts. Based on the LA *CEQA Thresholds Guide*, the determination of whether the project results in a significant impact on police protection shall be made considering the following factors: (a) the population increase resulting from the project, based on the net increase of residential units or square footage of nonresidential floor area; (b) the demand for police services anticipated at the time of project build-out compared to the expected level of service available, considering, as applicable, scheduled improvements to LAPD services (facilities, equipment, and officers) and the project’s proportional contribution to the demand; and (c) whether the project includes security and/or design features that would reduce the demand for police services.

The proposed project site is located in the Southwest division of the LAPD’s South Bureau. The Southwest division is approximately 13 square miles and is bordered by the I-10 on the north, I-110 on the east, Vernon Avenue on the south, and La Cienega Boulevard on the west. There are approximately 352 sworn police officers and 32 civilian support staff deployed over three watches at the Southwest division.⁷⁹ The proposed project would be served by the Southwest Community Police Station at 1546 MLK Blvd., one mile west of the proposed project site. Based on the residential service population of approximately 165,000 residents within the LAPD’s Southwest division service area,⁸⁰ the officer-to-resident ratio is approximately 2.1 officers per 1,000 residents.

79 City of Los Angeles Police Department (LAPD), “About Southwest,” http://www.lapdonline.org/southwest_community_police_station/content_basic_view/1639, accessed March 2016.

80 LAPD, “About Southwest,” http://www.lapdonline.org/southwest_community_police_station/content_basic_view/1639, accessed March 2016.

Construction

Construction sites have the potential to attract trespassers and/or vandals that would potentially result in graffiti, excess trash, and potentially unsafe conditions for the public. Such occurrences would adversely affect the aesthetic character of the proposed project site and surrounding area and could potentially cause public health and safety concerns, thereby increasing demand upon the local police department. As such, the proposed project would construct a fence around the proposed project site to minimize trespassing, vandalism, short-cut attractions, and attractive nuisances. With implementation of Mitigation Measure MM XIV-20, impacts would be less than significant.

Mitigation Measures: The following mitigation measure shall be implemented to reduce impacts to a less than significant level.

MM XIV-20 Public Services (Police – Demolition/Construction Sites)

- Temporary construction fencing shall be placed along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to keep unpermitted persons from entering the construction area.

Operation

Response time represents the period elapsed from the initiation of an assistance call to the appearance of a police unit at the scene. Calls for police assistance are prioritized based on the nature of the call. Unlike fire protection services, as previously discussed, police units are most often in a mobile state; hence, actual distance between a headquarters facility and a given project site is of little relevance. Instead, the number of police officers out on the street is more directly related to the realized response time. The LAPD has a preferred response time of seven minutes to emergency calls.

Implementation of the proposed project would result in an increase in site visitors, residents, and employees within the proposed project site, thereby generating a potential increase in the number of service calls from the proposed project site. Responses to thefts, vehicle burglaries, vehicle damage, traffic-related incidents, and crimes against persons would be anticipated to escalate as a result of the increased on-site activity and increased traffic on adjacent streets and arterials. It is anticipated that any increase in demands on police services would be relatively low and not necessitate the construction of a new police station, the construction of which may cause significant environmental impacts. Nonetheless, to mitigate potential increases in demand on police services, the proposed project shall implement Mitigation Measure MM XIV-30 to enhance the safety of the proposed project site. With the implementation of Mitigation Measure MM-XIV-30, impacts would be less than significant.

Mitigation Measures: The following mitigation measure shall be implemented to reduce impacts to a less than significant level.

MM XIV-30 Public Services (Police)

- The plans shall incorporate the *Design Guidelines* (defined in the following sentence) relative to security, semi-public and private spaces, which may include, but not be limited to, access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the project site if needed. Please refer to *Design Out Crime Guidelines: Crime Prevention Through Environmental Design*, published by the Los Angeles Police Department. Contact the Community Relations Division, located at 100 West 1st Street, #250, Los Angeles, CA 90012; (213) 486-6000. These measures shall be approved by the Police Department prior to the issuance of building permits.

Cumulative Impacts

Potentially Significant Impact Unless Mitigation Incorporated. The proposed project, in combination with the 12 related projects, would increase the demand for police protection services in the proposed project area. Specifically, there would be an increased demand for additional LAPD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (e.g., sales taxes, government funding, and developer fees), to which the proposed project and related projects would contribute. In addition, each of the related projects would be individually subject to LAPD review and would be required to comply with all applicable safety requirements of the LAPD and the City including mitigation similar to Mitigation Measure MM XIV-30 identified for the proposed project to adequately address police protection service demands. Furthermore, each of the related projects would likely install and/or incorporate adequate crime prevention design features in consultation with the LAPD, as necessary, to further decrease the demand for police protection services. To the extent cumulative development causes the need for additional police stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas and would not likely cause a significant impact upon the environment. Nevertheless, the citing and development on any new police stations would be subject to further CEQA review and evaluated on a case-by-case basis. However, as the LAPD does not currently have any plans for new police stations to be developed in proximity to the proposed project site, no impacts are currently anticipated to occur. On this basis, the proposed project would not make a cumulatively considerable contribution to police protection services impacts. Thus, impacts would be less than significant with mitigation.

Mitigation Measures: Mitigation measures for the 12 related projects would be comparable to the mitigation measure for the proposed project. Therefore, no further proposed project mitigation measures are necessary.

iii. Schools.

Less than Significant Impact. A significant impact may occur if a project includes substantial employment or population growth, which could generate a demand for school facilities that would exceed the capacity of the Los Angeles Unified School District (“LAUSD”). Based on the LA *CEQA Thresholds Guide*, the determination of whether the project results in a significant impact on public schools shall be made considering the following factors: (a) the population increase resulting from the project, based on the net increase of residential units or square footage of nonresidential floor area; (b) the demand for school services anticipated at the time of project build-out compared to the expected level of service available. Consider, as applicable, scheduled improvements to LAUSD services (facilities, equipment, and personnel) and the project’s proportional contribution to the demand; (c) whether (and to the degree to which) accommodation of the increased demand would require construction of new facilities, a major reorganization of students or classrooms, major revisions to the school calendar (such as year-round sessions), or other actions which would create a temporary or permanent impact on the school(s); and (d) whether the project includes features that would reduce the demand for school services (e.g., on-site school facilities or direct support to LAUSD).

The commercial profile of the proposed project would not generate substantial demand for LAUSD school services. In addition, the Applicant would be expected to pay applicable school fees in accordance with California Government Code Section 65995, which are deemed by Code to be full and complete mitigation of any impacts. Furthermore, no schools are located along the construction trip route to the proposed project site. Thus, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

Cumulative Impacts

Potentially Significant Impact Unless Mitigation Incorporated. The evaluation of related project’s impacts on schools would be conducted on a project-by-project basis in conjunction with each individual project proposal. Mitigation Measure MM-XIV-50 would ensure that haul route scheduling minimizes conflicts with pedestrians, school buses, and cars at the arrival and dismissal times of the school day. The LAUSD schools that would serve the related projects would operate over capacities with cumulative student generation, and new or expanded schools could be needed. However, as mandated by state law, the Leroy F. Greene School Facilities Act of 1998 (SB 50) sets a maximum level of fees that a developer may be

required to pay to mitigate a project's impact on school fees. As such, the applicants of the related projects, in addition to the proposed project, would be required to pay a school fee to the LAUSD to help reduce cumulative impacts on school services. Compliance with the provisions of SB 50, pursuant to California Education Code, Section 17620(a)(1), is deemed to provide full and complete mitigation of school facilities impacts. The proposed project as well as the related projects would be required to pay these fees as applicable. Therefore, the full payment of all applicable school fees would reduce potential cumulative impacts to schools to less than significant levels. With the implementation of Mitigation Measure MM-XIV-50, impacts would be less than significant.

Mitigation Measures: The following mitigation measure shall be implemented to reduce impacts to a less than significant level.

MM XIV-50 Public Services (Schools affected by Haul Route)

- LADBS shall assign specific haul route hours of operation based upon Pacific Charter Middle School and/or Charter Middle School hours of operation.
- Haul route scheduling shall be sequenced to minimize conflicts with pedestrians, school buses and cars at the arrival and dismissal times of the school day. Haul route trucks shall not be routed past the school during periods when school is in session especially when students are arriving or departing from the campus.

iv. Parks

Less than Significant Impact. Based on the LA *CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on recreation and parks shall be made considering the following factors: (a) the net population increase resulting from the project; (b) the demand for recreation and park services anticipated at the time of project build-out compared to the expected level of service available. Consider, as applicable, scheduled improvements to recreation and park services (renovation, expansion, or addition) and the project's proportional contribution to the demand; and (c) whether the project includes features that would reduce the demand for park services (e.g., on-site recreation facilities, land dedication, or direct financial support to the Department of Recreation and Parks). A significant impact would occur if a project resulted in the construction of new recreation and park facilities that creates significant direct or indirect impacts to the environment.

The provision and adequacy of the City's parks and recreation facilities are addressed by the City's Public Recreation Plan, the Citywide Community Needs Assessment, and the LAMC. The Public Recreation Plan and the LAMC specifically relate to the provision of recreational and park facilities related to residential users since commercial developments, such as the proposed project, typically do not generate the need

for additional public parks and recreational facilities. The Citywide Community Needs Assessment examined current and future recreation needs in the City as a first step in developing a Citywide park master plan and a five-year capital improvement plan.

The proposed project does not include new housing nor substantial change in employment. The proposed project does not include any housing. While the proposed project would be a source of employment both during construction and operations, Honda of Downtown Los Angeles is an existing business with existing employees. While new employment opportunities are possible, the scale of opportunities is not large enough to induce regional growth. As such, impacts on the park demand would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

Cumulative Impacts

Less than Significant Impact. As discussed previously, the proposed project would have a less than significant impact on recreational resources. The proposed project in combination with the 12 related projects would be expected to increase the cumulative demand for parks and recreational facilities in the City. Related projects would be required to pay the Dwelling Unit Construction Tax to improve recreation and park facilities, the related projects that include residential units would be required to pay applicable Quimby fees or the City's Dwelling Unit Construction Tax pursuant to LAMC, Section 21.10.3(a)(1); to mitigate impacts upon park and recreational facilities. Additionally, each related project would be subject to the provisions of the LAMC for providing on-site open space, which is proportionately based on the amount of new development. Thus, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

v. Other Public Services

Libraries

Less than Significant Impact. A significant impact may occur if a project includes substantial employment or population growth that could generate a demand for other public facilities (such as libraries), that would exceed the capacity available to serve a project site.

The proposed project does not include new housing nor substantial change in employment. As such, impacts on library services would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

Cumulative Impacts

Less than Significant Impact. The 12 related projects that have a residential component could generate additional residents who could increase the demand upon library services. This increase in resident population would increase demands upon public library services. To meet the increased demands upon the City's Public Library system, Los Angeles voters passed a Library Bond Issue for \$178.3 million to improve, renovate, expand, and construct 32 branch libraries. Since the Program's inception in 1998, the Library Department and the Department of Public Works, Bureau of Engineering have made considerable progress in the design and construction of the branch library facilities. Based on growth forecasts utilized in the Public Library System's 2010 Strategic Plan, much of this growth has already been accounted for in planning new and expanded library facilities. Thus, since the proposed project would not generate new residents, the proposed project would not make a considerable contribution to impacts upon the City's library system. Therefore, the proposed project would not make a considerable contribution to impacts upon the City's library system. Thus, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

4.15 RECREATION

Impact Analysis

- 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?*

No Impact. As discussed in **Section 4.13, Population and Housing**, the proposed project would not result in a net increase in population nor would it contribute to a change in the demand for recreation. As such, no impact would occur.

Mitigation Measures: No mitigation measures are necessary.

- 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 proposed project site does not contain any recreational facilities and the proposed project does not include any recreational facilities. The proposed project would not result in a net increase in population nor a change in the demand for recreation. As such, no impacts would occur.

Mitigation Measures: No mitigation measures are necessary.

Cumulative Impacts

No Impact. As discussed above, the proposed project would have no impact on recreational resources. As such, the proposed project would not contribute to any cumulative impact.

Mitigation Measures: No mitigation measures are necessary.

4.16 TRANSPORTATION AND TRAFFIC

The following section summarizes and incorporates by reference information from the Traffic Study. The Department of Transportation Letter of Approval is included in **Appendix G.1** and the Traffic Study is included in **Appendix G.2** of this Initial Study.

Impact Analysis

- a. Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?*

Potentially Significant Impact Unless Mitigation Incorporated. An impact could occur if a project were to generate increases in traffic volumes that result in a substantial decrease in performance of the road system.

Construction Traffic

The proposed project would require the use of haul trucks during site clearing and excavation and the use of a variety of other construction vehicles throughout the construction of the proposed project. The addition of these vehicles into the street system would contribute to increased traffic in the proposed project vicinity. The haul trips would occur outside of the peak hours and during the permissible hauling hours identified in the haul route to be approved by the Department of Building and Safety. Workers would travel to the proposed project site during site clearing and excavation and the use of a variety of other construction vehicles throughout construction. The construction worker trips would occur outside of the peak hours. Due to the off-peak and temporary nature of construction traffic, impacts of construction traffic would be less than significant.

In addition, any truck trips would be limited to the length of time required for the proposed project's construction. The proposed project would require excavation and export of approximately 2,600 cubic yards of soil. Approximately 41 weekly haul trips would be required (or seven round-trips per day over a 6-day workweek), yielding 4 weeks of hauling and a total of 163 round-trips. Due to the off-peak and temporary nature of the traffic, the proposed project would incorporate Mitigation Measure MM XVI-30.

Impacts would be less than significant with mitigation incorporated.

Mitigation Measures: The following mitigation measure shall be implemented to reduce impacts to a less-than-significant level.

MM XVI-30 Transportation (Haul Route)

- The developer shall install traffic signs in accordance with the LAMC around the site to ensure pedestrian and vehicle safety.

Operational Traffic

Based on the LA *CEQA Thresholds Guide*, a project could result in a significant impact if the relationship between the change in V/C ratio and the resulting final LOS⁸¹ is as follows:

- Final V/C ratio increase > 0.701 – 0.800 if final LOS is C and the proposed project related increase in V/C is equal to or greater than 0.040
- V/C ratio increase > 0.801 – 0.900 if final LOS is D and the proposed project related increase in V/C is equal to or greater than 0.020
- V/C ratio increase > 0.901 if final LOS is E or F and the proposed project related increase in V/C is equal to or greater than 0.010

Manual traffic counts of vehicular turning movements were conducted at each of the study intersections during the weekday morning and afternoon commuter periods to determine the peak-hour traffic volumes. The manual traffic counts at the study intersections were conducted from 7:00 AM to 10:00 AM to determine the AM peak commuter hour and from 3:00 PM to 6:00 PM to determine the PM peak commuter hours. Traffic volumes at the study intersections show the typical peak periods from 7:00 AM to 10:00 AM and 3:00 PM to 6:00 PM generally associated with the peak morning and afternoon commuter time periods. The weekday AM and PM peak period manual counts of vehicle movements at the study intersections are summarized in **Table 4.16–1 Year 2015 Existing Traffic Conditions**.

81 LOS is a letter grade given to intersection performance ranging from A to F. "Final" LOS is defined as projected future conditions, which include project, ambient, and related project growth but does not include project traffic mitigation.

**Table 4.16-1
Year 2015 Existing Traffic Conditions**

No.	Intersection	Peak Hour	Existing Conditions	
			V/C	LOS
1	Vermont Avenue at	AM	0.764	C
	Martin Luther King Jr. Boulevard	PM	0.773	C
2	Hoover Street at	AM	0.727	C
	Martin Luther King Jr. Boulevard	PM	0.523	A
3	Hoover Street at	AM	0.711	C
	Vernon Avenue	PM	0.499	A
4	Figueroa Street at	AM	0.686	B
	Exposition Boulevard- 37 th Street	PM	0.811	D
5	Figueroa Street at	AM	0.869	D
	Martin Luther King Jr. Boulevard	PM	0.825	D
6	I-110 Freeway SB Ramps at	AM	0.621	B
	Martin Luther King Jr. Boulevard	PM	0.539	A
7	I-110 Freeway NB Ramps-Hill	AM	0.702	C
	Street at Martin Luther King Jr. Boulevard	PM	0.685	B

Future Traffic Conditions

Estimates for the trips that would be generated by the proposed project are shown **Table 4.16-2, Project Trip Generation**.

**Table 4.16-2
Project Trip Generation**

Land Use	Size	Daily Trips ^a	AM Peak-Hour Trips			PM Peak-Hour Trips		
			In	Out	Total	In	Out	Total
<i>Proposed</i> Auto Dealership	45,839 SF	1,481	66	22	88	48	72	120
Driveway Subtotal		1,481	66	22	88	48	72	120
<i>Pass-by Trips^c</i> Auto Dealership (10%)		(148)	(7)	(2)	(9)	(5)	(7)	(12)
Net Increase		1,333	59	20	79	43	65	108

Source: ITE Land Use Code 841, Automobile Sales, Trip Generation, 9th ed., Institute of Transportation Engineers (ITE), 2012.

^a Trips are one-way traffic movements, entering or leaving.

^b ITE Land Use Code 841 (Automobile Sales) trip generation average rates.

-Daily Trip Rate: 32.30 trips/1,000 SF of floor area; 50% inbound/50% outbound

-AM Peak Hour Trip Rate: 1.92 trips/1,000 SF of floor area; 75% inbound/25% outbound

-PM Peak Hour Trip Rate: 2.62 trips/1,000 SF of floor area; 40% inbound/60% outbound

^c Pass-by trips are made as intermediate stops on the way from an origin to a primary trip destination without a route diversion. Pass-by trips are attracted from traffic passing the site on an adjacent street or roadway that offers direct access to the site. The trip reduction for pass-by trips has been applied to the project based on the "LADOT Traffic Study Policies and Procedures" (August 2014) for Auto Sales/Repair.

Table 4.16-3, Existing with and without Project Conditions, compares the results of the Existing with proposed project conditions to Existing without proposed project conditions during the weekday morning and afternoon peak hours for the study intersections.

Table 4.16-3
Existing with and without Project Conditions

No.	Intersection	Peak Hour	Existing without Project Conditions		Existing with Project Conditions		Change in V/C	Impact
			V/C	LOS	V/C	LOS		
1	Vermont Avenue at	AM	0.764	C	0.770	C	0.006	NO
	Martin Luther King Jr. Boulevard	PM	0.773	C	0.776	C	0.002	
2	Hoover Street at	AM	0.727	C	0.746	C	0.019	NO
	Martin Luther King Jr. Boulevard	PM	0.523	A	0.541	A	0.018	
3	Hoover Street at	AM	0.711	C	0.711	C	0.001	NO
	Vernon Avenue	PM	0.499	A	0.503	A	0.005	
4	Figueroa Street at	AM	0.686	B	0.687	B	0.001	NO
	Exposition Boulevard–37th Street	PM	0.811	D	0.812	D	0.001	
5	Figueroa Street at	AM	0.869	D	0.875	D	0.006	NO
	Martin Luther King Jr. Boulevard	PM	0.825	D	0.833	D	0.008	
6	I-110 Freeway SB Ramps at	AM	0.621	B	0.646	B	0.025	NO
	Martin Luther King Jr. Boulevard	PM	0.539	A	0.547	A	0.009	
7	I-110 Freeway NB Ramps–Hill	AM	0.702	C	0.701	C	-0.001	NO
	Street at Martin Luther King Jr. Boulevard	PM	0.685	B	0.690	B	0.005	

Source: LLG, Engineers, Traffic Impact Study for Honda of Downtown Los Angeles Project, April 2016.

As indicated in **Table 4.16-3**, application of the City’s threshold criteria for the existing with proposed project scenario, indicates that the proposed project is not expected to create significant impacts at the seven analyzed intersections. Thus, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

Residential Street Segment Analysis

A residential street segment analysis was prepared to address proposed project–related traffic using local streets to access the proposed project site. One residential street segment located near the proposed project site was analyzed for potential significant impacts: 40th Place, west of Figueroa Street. According to LADOT’s “Traffic Study Policies and Procedures,” August 2014, page 17, “A local residential street shall be deemed significantly impacted based on an increase in the projected average daily traffic (“ADT”)

volumes.” **Table 4.16-4, Street Segment Thresholds**, identifies the applicable thresholds to the proposed project.

**Table 4.16-4
Street Segment Thresholds**

Projected ADT with Project (Final ADT)	Project-Related Increase in ADT
0 to 999	120 or more
1,000 to 1,999	12 % or more of final ADT
2,000 to 2,999	10 % or more of final ADT
3,000 or more	8 % or more of final ADT

As indicated in **Table 4.16-5, Residential Street Segment Analysis**, the proposed project would not significantly impact the volumes along 40th Place west of Figueroa Street. Thus, impacts would be less than significant.

**Table 4.16-5
Residential Street Segment Analysis**

Street Segment	Scenario	24-Hr Volume w/o Project ^a	Proposed Project Distribution (%) ^b		Daily Project Build-out Trip Ends ^c	Projected ADT with Project	ADT % Increase with Project	Segment Impact ^d
			In	Out				
40th Place west of Figueroa	Existing	1,899	15	10	167	2,066	8.8	NO
	Future 2021	2,013	15	10	167	2,180	8.3	NO

Source: LLG, Engineers, *Traffic Impact Study for Honda Downtown Los Angeles Project*, April 2016.

^a Future 2021 traffic volumes estimated by applying a 1% annual growth factor to Existing traffic volumes

^b Forecast assignment of daily trips related to proposed project on street segment.

^c Forecast daily trips of proposed project (667 inbound trips, 666 outbound trips) applied to forecast assignment of trips on street segment.

^d According to LADOT’s “Traffic Study Policies and Procedures,” August 2014, p. 17: “A local residential street shall be deemed significantly impacted based on an increase in the projected average daily traffic (ADT) volumes.”

Mitigation Measures: No mitigation measures are necessary.

b. *Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?*

Less than Significant Impact. The Los Angeles County Congestion Management Program (“CMP”) requires that a Traffic Impact Assessment (“TIA”) be performed on three types of facilities: arterial intersections, mainline freeway segments, and the public transit system.⁸²

The CMP requires that a TIA be performed for all CMP arterial-monitoring intersections where a project would add 50 or more trips during either the weekday morning or afternoon peak hours. A detailed analysis is not required if the project adds fewer than 50 trips to an arterial monitoring Intersection. Significant impact requiring mitigation occurs if project traffic causes an incremental increase in intersection V/C ratio of 0.02 or greater to a facility projected to operate at LOS F (V/C > 1.00) after the addition of project traffic. The proposed project would add one trip to La Cienega Boulevard/Jefferson Boulevard, one trip to Manchester Avenue/Avalon Boulevard, and two trips to Manchester Avenue/Vermont Avenue intersections. The proposed project would not add 50 or more trips during either the AM or PM weekday peak hours at the identified CMP monitoring locations. Therefore, no further review is required.

The CMP requires that a TIA be performed for all CMP mainline freeway monitoring locations where a project would add 150 or more trips (in either direction) during the weekday morning or afternoon peak hours. A detailed analysis is not required if the project adds fewer than 150 trips to a mainline freeway monitoring location. The proposed project would contribute up to 20 PM weekday peak hour trips in the southbound direction on the I-110 at Vernon Avenue and up to 20 PM weekday peak hour trips in the northbound direction on the I-110 at Exposition Boulevard. As the proposed project would add less than 150 trips to a mainline freeway during a peak hour, no additional analysis is required.

As required by the *2010 Congestion Management Program for Los Angeles County*, the TIA conducted a review of the potential impacts of the proposed project on transit service. The proposed project trip generation was adjusted by values set forth in the CMP (i.e., person trips equal 1.4 times vehicle trips, and transit trips equal 3.5 percent of the total person trips) to estimate transit trip generation. Pursuant to the CMP guidelines, the proposed project is forecast to generate demand for four transit trips during the AM peak hour and five transit trips during the PM peak hour. Over a 24-hour period, the proposed project is forecast to generate demand for 65 daily transit trips. Therefore, the calculations are as follows:

82 Los Angeles County Metropolitan Transportation Authority, *2010 Congestion Management Program* (2010).

- AM Peak Hour = $79 \times 1.4 \times 0.035 = 4$ Transit Trips
- PM Peak Hour = $108 \times 1.4 \times 0.035 =$ five Transit Trips
- Daily Trips = $1,333 \times 1.4 \times 0.035 = 65$ Transit Trips

Bus transit lines and routes are provided adjacent or close to the proposed project site. Eight transit lines provide services for an average of (i.e., average of the directional number of buses during the peak hours) generally 100 buses during the AM peak hour and roughly 99 buses during the PM peak hour. Therefore, based on the above calculated AM and PM peak-hour trips, this would correspond to no more than one additional transit rider per bus. It is anticipated that the existing transit service in the proposed project area would adequately accommodate the increase of proposed project-generated transit trips. Thus, given the low number of proposed project-generated transit trips per bus, no proposed project impacts on existing or future transit services in the proposed project area are expected to occur as a result of the proposed project.

As discussed, the proposed project would not conflict with any travel demand measures, and therefore impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

c. *Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?*

No Impact. This question would apply to the proposed project only if it involved an aviation-related use or would influence changes to existing flight paths. As these uses and activities are not associated with the proposed project, no impact would occur.

Mitigation Measures: No mitigation measures are necessary.

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

Potentially Significant Unless Mitigation Incorporated. A significant impact could occur if a project includes new roadway design or introduces a new land use or features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if project site access or other features were designed in such a way as to create hazard conditions.

The proposed project anticipates that many patrons of the East Structure would seek to enter the site via the driveways along 40th Place by turning left from southbound Hoover St. onto 40th Place. Currently, the segment of Hoover St. between MLK Blvd. and 40th Place consists of two through lanes in the southbound direction, and one left-turn lane, one through lane, and one shared through/right-turn lane in the northbound direction. Customers traveling eastbound on MLK Blvd. would be allowed to enter the East Structure directly via right-turn ingress and egress movements only.

The proposed project would not include unusual or hazardous design features. However, the proposed project would include new vehicular access driveways to the proposed project site which would be properly designed and constructed to ensure the safety of pedestrian circulation in the proposed project area. As such, impacts during operation would be less than significant.

During construction, the proposed project may require the temporary closure of sidewalks abutting the proposed project site. Incorporation of Mitigation Measure MM XVI-80 would reduce proposed project impacts to less than significant levels.

Mitigation Measures: The following mitigation measure shall be implemented to reduce impacts to a less than significant level.

MM XVI-80 Transportation/Traffic

The proposed project will result in impacts to transportation and/or traffic systems. However, the impact can be reduced to a less than significant level through compliance with the following measure(s):

- Applicant shall plan construction and construction staging as to maintain pedestrian access on adjacent sidewalks throughout all construction phases. This requires the applicant to maintain adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding, etc.) from work space and vehicular traffic and overhead protection, due to sidewalk closure or blockage, at all times.
- Temporary pedestrian facilities should be adjacent to the proposed project site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility.
- Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects.
- Applicant shall keep sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction staging. Sidewalk shall be

reopened as soon as reasonably feasible taking construction and construction staging into account.

e. Would the project result in inadequate emergency access?

Potentially Significant Impact Unless Mitigation Incorporated. A significant impact could occur if a project design would not provide emergency access meeting the requirements of the LAFD, or in any other way threatened the ability of emergency vehicles to access and serve the proposed project site or adjacent uses.

As stated in **Section 4.8, Hazards and Hazardous Materials**, the proposed project is not located on or near an adopted emergency response or evacuation plan.⁸³ Development of the proposed project site may require temporary and/or partial street closures due to construction activities. While such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans. However, any such closures would be temporary in nature and would be coordinated with LADOT, LADBS, and the City's Department of Public Works. The proposed project would not cause permanent alterations to vehicular circulation routes and patterns and/or impede public access or travel on public rights-of-way. Although development of the proposed project may temporarily affect access on MLK Blvd., Hoover St., and/or 40th Place during construction, it is not anticipated that any of the proposed project's construction activities would impede access within any of the westbound lanes on MLK Blvd.

As described previously, the proposed project would satisfy the emergency response requirements of the LAFD. There are no hazardous design features included in the access design or site plan for the proposed project that could impede emergency access. Furthermore, the proposed project would be subject to the site plan review requirements of the LAFD and the LAPD to ensure that all access roads, driveways, and parking areas would remain accessible to emergency service vehicles as described in Mitigation Measures MM XIV-10 and MM XIV-30. The proposed project would not be expected to result in inadequate emergency access. Therefore, impacts would be less than significant.

Mitigation Measures: Mitigation Measures MM XIV-10 and MM XIV-30 shall be implemented to reduce impacts to less than significant.

83 City of Los Angeles General Plan, "Safety Element" (1996), Exhibit H, Critical Facilities and Lifeline Systems in the City of Los Angeles, <http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf>.

f. Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

No Impact. A significant impact could occur if a project would conflict with adopted polices or involve modification of existing alternative transportation facilities located on or off site. The proposed project would be located on a site already developed with paved surface parking. Existing roadway configurations and transit service, including the bus stop in front of the western portion of the site, would be maintained. In addition, the proposed project would include five short-term bicycle parking spaces and five long-term bicycle parking spaces. As such, no impacts would occur.

Mitigation Measures: No mitigation measures are necessary.

Cumulative Impacts

Less than Significant Impact. Development of the proposed project together with the related projects would result in an increase in average daily vehicle trips and peak-hour vehicle trips in the area. The Traffic Study discussed above included both an individual and cumulative analysis because the baseline discussion is a cumulative baseline. **Table 4.16-6, Year 2021 Future with and without Project Conditions,** compares the results of the Future with proposed project conditions to Future without proposed project conditions during the weekday morning and afternoon peak hours for the study intersections.

**Table 4.16-6
Year 2021 Future with and without Project Conditions**

No.	Intersection	Peak Hour	Future without Project Conditions		Future with Project Conditions		Change in V/C	Impact
			V/C	LOS	V/C	LOS		
1	Vermont Avenue at Martin Luther King Jr. Boulevard	AM	0.835	D	0.842	D	0.007	NO
		PM	0.856	D	0.858	D	0.002	NO
2	Hoover Street at Martin Luther King Jr. Boulevard	AM	0.797	C	0.816	D	0.019	NO
		PM	0.579	A	0.597	A	0.018	NO
3	Hoover Street at Vernon Avenue	AM	1.076	F	1.078	F	0.002	NO
		PM	0.724	C	0.727	C	0.003	NO
4	Figueroa Street at Exposition Boulevard- 37 th Street	AM	0.980	E	0.981	E	0.001	NO
		PM	0.853	D	0.854	D	0.001	NO
5	Figueroa Street at Martin Luther King Jr. Boulevard	AM	1.174	F	1.180	F	0.006	NO
		PM	1.134	F	1.142	F	0.008	NO

No.	Intersection	Peak Hour	Future without Project Conditions		Future with Project Conditions		Change in V/C	Impact
			V/C	LOS	V/C	LOS		
6	I-110 Freeway SB Ramps at Martin Luther King Jr. Boulevard	AM	0.700	C	0.704	C	0.004	NO
		PM	0.603	B	0.613	B	0.010	NO
7	I-110 Freeway NB Ramps-Hill Street at Martin Luther King Jr. Boulevard	AM	0.771	C	0.771	C	0.000	NO
		PM	0.767	C	0.768	C	0.001	NO

Source: LLG, Engineers, Traffic Impact Study for Honda of Downtown Los Angeles Project (April 2016).

As noted in **Table 4.16-6**, for the Future without proposed project conditions, all intersections are expected to continue to operate at LOS D or better during both the morning and afternoon peak hours. Under Future with proposed project conditions, all analyzed intersections would continue to operate under an acceptable LOS. Therefore, proposed project traffic would not exceed the threshold for Future with proposed project conditions and would thus result in less than significant cumulative impacts. As noted in **Table 4.16-6**, all increases in V/C ratios in the AM and PM peak hours would be less than the thresholds for a significant impact to occur. Therefore, the proposed project's contribution to cumulative impacts is less than significant for all of the study intersections analyzed. As concluded above, the proposed project's contribution to cumulative impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

4.17 UTILITIES AND SERVICE SYSTEMS

Impact Analysis

a. *Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?*

No Impact. A significant impact would occur if a project exceeds wastewater treatment requirements of the applicable RWQCB. According to Section 13260 of the California Water Code, people discharging or proposing to discharge waste that could affect the quality of the waters of the State, other than into a community sewer system, shall file a Report of Waste Discharge (“ROWD”) containing information which may be required by the appropriate RWQCB. The RWQCB then authorizes an NPDES permit that ensures compliance with wastewater treatment and discharge requirements. The LARWQCB enforces wastewater treatment and discharge requirements for properties in the proposed project area.

Wastewater from the proposed project site is conveyed via municipal sewage infrastructure maintained by the Los Angeles Bureau of Sanitation to the Hyperion Treatment Plant (“HTP”). The HTP daily flow is 362 million gallons per day (“mgd”) with a total treatment capacity of 450 mgd. The HTP is a public facility and, therefore, is subject to the State’s wastewater treatment requirements. Wastewater from the proposed project site would continue to be treated according to the wastewater treatment requirements enforced by the LARWQCB. Thus, no impacts would occur

Mitigation Measures: No mitigation measures are necessary.

b. *Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?*

Less than Significant Impact. A significant impact may occur if a project would increase water consumption or wastewater generation to such a degree that the capacity of facilities currently serving a project site would be exceeded. Based on the LA *CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on water shall be made considering the following factors: (a) the total estimated water demand for the project; (b) whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project build-out; (c) the amount by which the project would cause the projected growth in population, housing, or employment for the Community Plan area to be exceeded in the year of the project completion; and (d) the degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.

Water Treatment Facilities and Existing Infrastructure

LADWP ensures the reliability and quality of its water supply through an extensive distribution system that includes more than 7,100 miles of pipes, more than 100 storage tanks and reservoirs within the City, and eight storage reservoirs along the Los Angeles Aqueducts. Much of the water flows north to south, entering Los Angeles in Sylmar at the Los Angeles Aqueduct Filtration Plant (“LAAFP”) in Sylmar, which is owned and operated by the LADWP. Water entering the LAAFP undergoes treatment and disinfection before being distributed throughout the LADWP’s Water Service Area. The LAAFP has the capacity to treat approximately 600 mgd. The average plant flow is approximately 450 mgd during the non–summer months and 550 mgd during the summer months; thus, the plant operates at between 75 and 90 percent capacity, respectively. Therefore, the LAAFP has a remaining treatment capacity of approximately 50 to 150 mgd, depending on the season.

As shown in **Table 4.17-1, Estimated Project Water Demand**, the proposed project would generate a demand for approximately 10,059 gallons per day (“gpd”) of water, significantly below available capacity. In accordance with the *LA CEQA Thresholds Guide*, the estimated water demand was based on 120 percent of the sewerage generation factors for commercial categories.⁸⁴ The estimate was then adjusted to reflect the 20 percent water conservation mandate pursuant to the LA Green Building Code. The LA Green Building Code requires projects to achieve a 20 percent reduction in potable water use and wastewater generation from existing conditions. Consequently, based on the estimates provided in **Table 4.17-1**, implementation of the proposed project is not expected to measurably reduce the LAAFP’s capacity of 600 mgd; therefore, no new or expanded water treatment facilities would be required. With respect to water treatment facilities, the proposed project would have a less than significant impact.

84 LA *CEQA Thresholds Guide* (2006), Exhibit M.2-12.

**Table 4.17-1
Estimated Project Water Demand**

Type of Use	Net Size of Use	Demand Factor^a	Daily Demand (gpd)
East Structure	22,000 sq. ft.	50/1,000 sq. ft.	1,100
Car Wash	1,667 sq. ft.	50 gallons/vehicle	8,500
Service Bays and Storage	21,000 sq. ft.	30/1,000 sq. ft.	630
West Structure	117,200 sq. ft.	20/1,000 sq. ft.	2,344
Total Project Water Demand			12,574
<i>Less 20% Per LA Green Building Code</i>			<i>2,515</i>
Total Project Demand			10,059

Notes:

Assume 34 vehicles washed every two hours over a 10-hour work day. gsf = gross square feet; du = dwelling units; gal = gallons

^a 120 percent sewage generation loading factor

In the event that any further water main and/or other infrastructure upgrades are required for the proposed project, such infrastructure improvements would be conducted within the right-of-way easements serving the proposed project area and would not create a significant impact to the physical environment. This is largely due to the fact that any disruption of service would be of a short-term nature, the replacement of the water mains would be within public rights-of-way, and any foreseeable infrastructure improvements would be limited to the immediate proposed project vicinity. Potential impacts resulting from water infrastructure improvements would be less than significant.

Wastewater Treatment Facilities and Existing Infrastructure

Based on the criteria established in the *LA CEQA Thresholds Guide*, a project would normally have a significant wastewater impact if (a) the project would cause a measurable increase in wastewater flows to a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or (b) the project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements.

The Los Angeles Bureau of Sanitation provides sewer service to the proposed project area. Sewage from the proposed project site is conveyed via sewer infrastructure to the HTP. The HTP treats an average daily flow of 362 mgd and has the capacity to treat 450 mgd.⁸⁵ This equals a remaining capacity of 88 mgd of

⁸⁵ City of Los Angeles Department of Public Works, Bureau of Sanitation, Hyperion Treatment Plant, http://san.lacity.org/lasewers/treatment_plants/hyperion/index.htm.

wastewater able to be treated at the HTP.⁸⁶ As shown in **Table 4.17-2, Project Estimated Wastewater Generation**, the proposed project would generate approximately 5,005 gpd of wastewater, representing a fraction of one percent of the available capacity.

**Table 4.17-2
Project Estimated Wastewater Generation**

Type of Use	Size of Use	Wastewater Generation Rate (gpd/unit) ^a	Total Wastewater Generated (gpd)
East Structure	22,000 sq. ft.	40/1,000 sq. ft.	880
Car Wash	1,667 sq. ft.	17.5 gallons/vehicle	2,975
Service Bays and Storage	21,000 sq. ft.	25/1,000 sq. ft.	525
West Structure	117,200 sq. ft.	16/1,000 sq. ft.	1,876
Net Project Wastewater Generation			6,256
<i>Less 20% Per LA Green Building Code</i>			<i>1,251</i>
Total Project Wastewater Generation			5,005

Note: Car wash assumes 65% water reuse rate.

^a LA CEQA Thresholds Guide (2006), Exhibit M.2-12.

In accordance with the LA CEQA Thresholds Guide, the base estimated sewer flows were based on the sewerage generation factors for commercial categories.⁸⁷ The estimate was then adjusted to reflect the 20 percent water conservation mandate pursuant to the LA Green Building Code. As already noted, the LA Green Building Code requires projects to achieve a 20 percent reduction in potable water use and wastewater generation. The HTP has a remaining capacity to treat an 88 additional mgd and would have adequate capacity to serve the proposed project. Thus, impacts would less than significant.

Mitigation Measures: No mitigation measures are required.

c. *Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?*

No Impact. A significant impact may occur if the volume of stormwater runoff would increase to a level exceeding the capacity of the storm drain system serving a project site, resulting in the construction of new stormwater drainage facilities. As described previously, the proposed project would not result in a significant increase in site runoff, or any changes in the local drainage patterns. Runoff from the proposed

⁸⁶ City of Los Angeles Department of Public Works, Bureau of Sanitation, Hyperion Treatment Plant, http://san.lacity.org/lasewers/treatment_plants/hyperion/index.htm.

⁸⁷ Bureau of Sanitation (2004).

project site currently is and would continue to be collected on the proposed project site and directed toward existing storm drains in the proposed project vicinity. The proposed project will be required to demonstrate compliance with LID Ordinance standards and retain or treat the first ¾-inch of rainfall in a 24-hour period. Thus, the rate of postdevelopment runoff and pollutants from the proposed project site would be reduced under the proposed project. The proposed project would not create or contribute water runoff that would exceed the capacity of existing or planned stormwater drainage systems. Thus, no impacts would occur.

Mitigation Measures: No mitigation measures are required.

d. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new and expanded entitlements needed?

Less than Significant Impact. A significant impact may occur if a project would increase water consumption to such a degree that new water sources would need to be identified. Based on the *LA CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on water shall be made considering the following factors: (a) the total estimated water demand for a project; (b) whether sufficient capacity exists in the water infrastructure that would serve a project, taking into account the anticipated conditions at project completion; (c) the amount by which a project would cause the projected growth in population, housing, or employment for the Community Plan area to be exceeded in the year of a project completion; and (d) the degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.

According to the City's Urban Water Management Plan ("UWMP"), the City's projected demand for water, during dry seasons would be 2,236,000 acre-feet per year ("afy") for 2015 and 2,188,000 afy for 2020.⁸⁸

As shown in **Table 4.17-1**, the proposed project's net increase for water demand would be 10,059 gpd or 11.3 afy. The proposed project's net increase for water demand would represent less than 0.1 percent of the City's total demand. Additionally, the proposed project is consistent with growth projections in the UWMP. The UWMP projects adequate water supplies through 2020.

In addition, City efforts are underway to increase use of recycled water, expand capture of local stormwater runoff, and expand LADWP's water conservation programs to decrease reliance on purchased imported water for future demand. Short- and long-term conservation strategies include enforcing and expanding prohibited uses of water, increased use of recycled water, enhanced stormwater capture,

⁸⁸ City Department of Public Works. *City of Los Angeles Urban Water Management Plan* (2010).

extending outreach efforts, and encouraging regional conservation measures. The City plans to meet all future increases in water demand through a combination of local water supply development and short- and long-term conservation strategies.

Finally, pursuant to LAMC Section 122.03(a) and Regulatory Compliance Measure RC-WS-2, the proposed project would utilize water-saving devices, including but not limited to urinals equipped with flush-o-meter valves which flush with a maximum of 1.28 gallons. Regulatory Compliance Measure RC-WS-3 requires a water recycling system for the proposed car wash. As indicated in Regulatory Compliance Measure RC-WS-4, the proposed project would also comply with Ordinance No. 170,978 (Water Management Ordinance), which imposes numerous water conservation measures for landscaped areas. Thus, impacts would be less than significant.

Regulatory Compliance Measure RC-WS-2 (Green Building Code): The project shall implement all applicable mandatory measures within the LA Green Building Code that would have the effect of reducing the project's water use.

Regulatory Compliance Measure RC-WS-3 (New Carwash): The Applicant shall incorporate a water recycling system to the satisfaction of the Department of Building and Safety.

Regulatory Compliance Measure RC-WS-4 (Landscape): The project shall comply with Ordinance No. 170,978 (Water Management Ordinance), which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season).

Mitigation Measures: No mitigation measures are required.

e. 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. Based on the criteria established in the LA CEQA *Thresholds Guide*, a project would normally have a significant wastewater impact if (a) a project would cause a measurable increase in wastewater flows to a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or (b) a project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by

generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements. As stated in **Section 4.17 (b)**, the HTP treats an average daily flow of 362 mgd, and has the capacity to treat 450 mgd, leaving a remaining capacity of 88 mgd of wastewater able to be treated at the HTP. As shown in **Table 4.17-2**, the proposed project would generate approximately 5,005 gpd of wastewater, representing a fraction of one percent of the available capacity. Therefore, there would be adequate capacity to treat wastewater flows from the proposed project. Thus, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

f. *Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?*

Less than Significant Impact. A significant impact may occur if a project were to increase solid waste generation to a degree such that the existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. Based on the *LA CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on solid waste shall be made considering the following factors: (a) amount of projected waste generation, diversion, and disposal during demolition, construction, and operation of the project, considering proposed design and operational features that could reduce typical waste generation rates; (b) need for additional solid waste collection route, or recycling or disposal facility to adequately handle project-generated waste; and (c) whether a project conflicts with solid waste policies and objectives in the Source Reduction and Recycling Element ("SRRE") or its updates, the Solid Waste Management Policy Plan ("CiSWMPP"), or the Framework Element of the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE.

Solid waste generated within the City is disposed of at privately owned landfill facilities throughout Los Angeles County. While the Bureau of Sanitation provides waste collection services to single-family and some small multifamily developments, private haulers provide waste collection services for most multifamily residential and commercial developments within the City. Solid waste transported by both public and private haulers is recycled, reused, transformed at a waste-to-energy facility, or disposed of at a landfill. Within the City, the Chiquita Canyon Landfill and the Manning Pit Landfill serve existing land uses within the City. Both landfills accept residential, commercial, and construction waste. The Chiquita Canyon Landfill currently has a remaining capacity of 4.9 million tons,⁸⁹ while the Manning Pit Landfill has a

89 County of Los Angeles Department of Public Works, *2011 Annual Report: Los Angeles Countywide Integrated Waste Management Plan* (Alhambra, CA: County of Los Angeles Department of Public Works, August 2012).

remaining capacity of 540,000 tons.⁹⁰ Thus, the Chiquita Canyon Landfill and Manning Pit Landfill combined have a remaining permitted daily intake of approximately 5.4 million tons. The Chiquita Canyon Landfill has an estimated remaining life of 4 years. Although this is close to proposed project build-out, an expansion of the Chiquita Canyon Landfill that would increase capacity by 23,872,000 tons (a 21-year life expectancy) is currently under proposal. Therefore, there would be no break in service, and Chiquita Canyon Landfill would be sufficiently able to serve the proposed project.

The proposed project would follow all applicable solid waste policies and objectives that are required by law, statute, or regulation. The solid waste disposal needs would be directed to the local recycling facilities and landfills described above. Based on the gross development size of 260,000 square feet of floor area and a standard waste generation rate of 4.38 pounds per square foot, it is estimated that the construction of the proposed project would generate approximately 1,138,800 pounds, or 569 tons of debris during the construction process.⁹¹

As shown in **Table 4.17-3, Expected Operational Solid Waste Generation**, the proposed project's generation during the life of the proposed project would be approximately 530 pounds per day or 83 tons per year, which is within the available capacities at area landfills. This estimate is conservative: it does not factor in any recycling or waste diversion programs. The proposed project's solid waste would be handled by private waste collection services and would only contract for waste disposal services with a company that recycles demolition- and construction-related wastes. Pursuant to Regulatory Compliance Measure RC-SW-2 prior to the issuance of any construction permit, the Applicant would provide a copy of the receipt or contract from a waste disposal company providing services to the proposed project, specifying recycled waste service(s), to the satisfaction of the LADBS. To facilitate on-site separation and recycling of construction-related wastes, the contractor(s) would provide temporary waste separation bins on site during demolition and construction pursuant to Regulatory Compliance Measure RC-SW-3. These bins would be emptied and the contents recycled accordingly as a part of the proposed project's regular solid waste disposal program. Thus, impacts would be less than significant.

90 County of Los Angeles Department of Public Works, "Spreading Facility Information," <http://www.ladpw.org/wrd/spreadingground/information/facdept.cfm?facinit=21>.

91 US EPA Report No. EPAA530-98-010. *Characterization of Building Related Construction and Demolition Debris in the United States*, June 1998, page A-1. <http://www.epa.gov/wastes/hazard/generation/sqg/cd-rpt.pdf>.

**Table 4.17-3
Expected Operational Solid Waste Generation**

Type of Use	Size	Waste Generation Rate^a (lb./unit/day)	Total Solid Waste Generated (lb./day)
East Structure	22,000 sq. ft.	6/1,000 sq. ft.	132
Service Bays and Storage	21,000 sq. ft.	5/1,000 sq. ft.	105
West Structure	117,200 sq. ft.	2.5/1,000 sq. ft.	293
Total Solid Waste Generation			530

Notes: lb. = pounds; sq. ft. = square feet.

^a Calrecycle, Waste Characterization Commercial: Estimated Solid Waste Generation and Disposal Rates.

Regulatory Compliance Measure RC-SW-2 (Construction Waste Recycling): In order to meet the diversion goals of the California Integrated Waste Management Act and the City of Los Angeles, which will total 70 percent by 2013, the Applicant shall salvage and recycle construction and demolition materials to ensure that a minimum of 70 percent of construction-related solid waste that can be recycled is diverted from the waste stream to be landfilled. Solid waste diversion would be accomplished through the on-site separation of materials and/or by contracting with a solid waste disposal facility that can guarantee a minimum diversion rate of 70 percent. In compliance with the Los Angeles Municipal Code, the General Contractor shall utilize solid waste haulers, contractors, and recyclers who have obtained an Assembly Bill (AB) 939 Compliance Permit from the City of Los Angeles Bureau of Sanitation.

Regulatory Compliance Measure RC-SW-3 (Commercial/Multifamily Mandatory Recycling): In compliance with AB 341, recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the proposed project's regular solid waste disposal program. The proposed project Applicant shall only contract for waste disposal services with a company that recycles solid waste in compliance with AB341.

Mitigation Measures: No mitigation measures are necessary.

g. Would the project comply with federal, State, and local statutes and regulations related to solid waste?

Less than Significant Impact. A significant impact may occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. The proposed project would generate solid waste that is typical of an automotive sales and service operation and would comply with all Federal, State, and local statutes and regulations regarding proper disposal. Thus, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

Energy

Less than Significant Impact. CEQA Appendix F: Energy Conservation, states that the goal of conserving energy implies wise and efficient energy use. The means of achieving this goal include decreasing overall per capita energy consumption; decreasing reliance on fossil fuels such as coal, natural gas, and oil; and increasing reliance on renewable energy sources. Energy conservation implies that a project's cost effectiveness be reviewed in terms of energy requirements and the corresponding monetary cost.

Based on the LA *CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on energy shall be made considering the following factors: (a) the extent to which a project would require new (off-site) energy supply facilities and distribution infrastructure, or capacity-enhancing alterations to existing facilities; (b) whether and when the needed infrastructure was anticipated by adopted plans; and (c) the degree to which a project design and/or operations incorporate energy conservation measures, particularly those that go beyond City requirements. A significant impact would occur if a proposed project required additional energy supply facilities and/or distribution infrastructure, creating significant direct or indirect impacts to the environment.

The proposed project would comply with the California Energy Commission 2013 Building Energy Efficiency Standards, Title 24, Part 6, ("Energy Standards") and Regulatory Compliance Measure RC-EN-1. The Energy Standards focus on several key areas to improve the energy efficiency of newly constructed buildings, and include requirements that will enable both demand reductions during critical peak periods and future solar electric and thermal system installations. The Energy Standards also include updates to the energy efficiency divisions of the California Green Building Code Standards (Title 24, Part 11). A set of prerequisites has been established for both the residential and nonresidential Energy Standards, which include efficiency measures that should be installed in any building project striving to meet advanced levels of energy efficiency. California Energy Commission staff estimates that the implementation of the Energy Standards may reduce statewide annual electricity consumption by approximately 613 gigawatt-hours per year, electrical peak demand by 195 megawatts, and natural gas consumption by 10 million therms per year. Some of these Energy Standards include:

1. Installed gas-fired space heating equipment shall have an Annual Fuel Utilization Ratio ("AFUE") of 0.90 or higher.
2. Installed electric heat pumps shall have a Heating Seasonal Performance Factor ("HSFP") of 8.0 or higher.

3. Installed cooling equipment shall have a Seasonal Energy Efficiency Ratio (“SEER”) higher than 13.0 and an Energy Efficiency Ratio (“EER”) of at least 11.5.
4. Installed tank-type water heaters shall have an Energy Factor (“EF”) higher than 0.6.
5. Installed tankless water heaters shall have an EF higher than 0.80.
6. Duct-leakage testing shall be performed to verify a total leakage rate of less than six percent of the total fan flow.
7. Building lighting in the kitchen and bathrooms within the dwelling units shall consist of at least 90 percent ENERGY STAR qualified hard-wired fixtures (luminaires).

Thus, impacts would be less than significant.

Regulatory Compliance Measure RC-EN-1 (Green Building Code): The proposed project shall implement all applicable mandatory measures within LA Green Building Code that would have the effect of reducing the proposed project’s energy use.

Mitigation Measures: No mitigation measures are required.

Cumulative Impacts

Less than Significant Impact. As previously mentioned, the water demand for the proposed project would be 10,059 gpd. Water demand for the proposed project plus 12 related projects would be approximately 2.7 mgd significantly below the capacity of the LAAFP, which is able to treat approximately 600 mgd. Therefore, the LAAFP has the capacity to treat water for the proposed project and all related projects. With regard to stormwater, the proposed project and all related projects would be required to demonstrate compliance with LID Ordinance standards and retain or treat the first ¾-inch of rainfall in a 24-hour period, and therefore would not create or contribute water runoff that would exceed the capacity of the City’s stormwater drainage system. Finally, wastewater from the proposed project site, as well as from related projects, would be conveyed via municipal sewage infrastructure maintained by the Los Angeles Bureau of Sanitation to the HTP and would be treated according to the wastewater treatment requirements enforced by the LARWQCB. The proposed project would generate approximately 5,005 gpd of wastewater. The proposed project plus related projects would generate approximately 2.5 mgd of wastewater, significantly below the capacity of the HTP, which is able to treat approximately 88 mgd.

Implementation of the proposed project in conjunction with the 12 related projects would further increase regional demands on landfill capacity. The impact of the continued growth of the region would likely have the effect of diminishing the daily excess capacity of the existing landfills serving the City. Although there

are several proposals for new landfills in the region, there are currently few viable options for the disposal of City waste past 2029 because of a lack of space. The proposed project would contribute approximately 83 tons of solid waste per year. The proposed project plus related projects would generate approximately 138,860 tons of solid waste per year, representing approximately 2.6 percent of the current remaining capacity of the Chiquita Canyon Landfill and the Manning Pit Landfill, which combined have a remaining permitted intake of approximately 5.4 million tons. As with the proposed project, related projects would participate in regional source reduction and recycling programs, significantly reducing the number of tons deposited in area landfills. Although adequate capacity currently exists to accommodate the cumulative disposal needs of the proposed project and related projects, it should be noted that continued capacity beyond the year 2029 is too uncertain and speculative to address in this Initial Study. Solutions to resolve the regional solid waste disposal needs are continuously being investigated at the State, regional and local levels. Nevertheless, given the currently adequate capacity to accommodate the cumulative disposal needs of the proposed project and related projects, the proposed project's operational solid waste demands are less than cumulatively considerable and thus cumulative impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

4.18 MANDATORY FINDINGS OF SIGNIFICANCE

Impact Analysis

- a. Does the project have the potential to 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, 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 Unless Mitigation Incorporated. A significant impact may occur only if a proposed project would have an identified potentially significant impact for any of the cited issues. The proposed project is located in a densely populated urban area and would have no unmitigated significant impacts with respect to biological resources and less than significant cultural resource impacts provided the mitigation measures and regulatory compliance measures listed previously are implemented. Additionally, although no known direct impacts to cultural resources are anticipated, precautionary measures are recommended to ensure any impacts upon cultural resources are less than significant in the unlikely event any such archaeological, or paleontological materials are accidentally discovered during the construction process. Therefore, with mitigation, the proposed project would not degrade the quality of the environment, reduce or threaten any fish or wildlife species (endangered or otherwise, see Mitigation Measure MM IV-20 and MM IV-70), or eliminate important examples of the major periods of California history or prehistory.

Mitigation Measures: Mitigation Measures MM IV-20 and MM IV-70 shall be implemented to reduce impacts relating to biological resources to a less-than-significant level.

- 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 Unless Mitigation Incorporated. A significant impact may occur if the proposed project, in conjunction with other 12 related projects in the area of the proposed project site, would result in impacts that would be less than significant when viewed separately, but would be significant when viewed together. As concluded in this analysis, the proposed project's incremental contribution to cumulative impacts related to aesthetics, agriculture and forestry resources, air quality,

biological resources, cultural resources, geology/soils, greenhouse gas emissions, hazards/hazardous materials, hydrology/water quality, land use/planning, mineral resources, noise, population/housing, public services, recreation, transportation/traffic, and utilities would be less than significant with the proposed Mitigation Measures incorporated. Therefore, impacts would be less than significant with Mitigation Measure **XVIII-10** incorporated.

Mitigation Measures: Mitigation Measure MM XVIII-10 shall be implemented to reduce impacts to a less than significant level.

XVIII-10 Cumulative Impacts

There may be environmental impacts which are individually limited, but significant when viewed in connection with the effects of past projects, other current projects, and probable future projects. However, these cumulative impacts will be mitigated to a less than significant level through compliance with the above mitigation measures.

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

Potentially Significant Impact Unless Mitigation Incorporated. A significant impact may occur if the proposed project has the potential to result in significant impacts, as discussed in the preceding sections. Based on the preceding environmental analysis, the proposed project would not have significant environmental effects on human beings, either directly or indirectly. Any potentially significant impacts would be reduced to less than significant levels through the implementation of Mitigation Measures MM-XVIII-20 and MM-XVIII-30.

Impacts would be less than significant with mitigation incorporated.

Mitigation Measures: Mitigation Measures MM-XVIII-20 and MM-XVIII-30 shall be implemented to reduce impacts to a less than significant level.

XVIII-20 Effects on Human Beings

The proposed project has potential environmental effects which cause substantial adverse effects on human beings, either directly or indirectly. However, these potential impacts will be mitigated to a less than significant level through compliance with the above mitigation measures.

XVIII-30

MND

The conditions outlined in this proposed mitigated negative declaration which are not already required by law shall be required as condition(s) of approval by the decision-making body except as noted on the face page of this document. Therefore, it is concluded that no significant impacts are apparent which might result from this proposed project's implementation.

5.0 REFERENCES

The following documents and information were used in the preparation of this Initial Study:

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- City of Los Angeles General Plan*. "Land Use Element."
- City of Los Angeles General Plan*. "Mobility Element." 2015.
- City of Los Angeles General Plan*. "Open Space and Conservation Element." 2001.
- City of Los Angeles General Plan*. "Safety Element." 1996.
- City of Los Angeles General Plan*. "Service Systems Element."
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