



City of Los Angeles

Department of City Planning • Environmental Analysis Section

City Hall • 200 N. Spring Street, Room 750 • Los Angeles, CA 90012

INITIAL STUDY/Mitigated Negative Declaration

WESTLAKE COMMUNITY PLAN AREA

2005 James M Wood Boulevard Hotel Project

Case Number: ENV-2017-713-MND

Project Location: The Project is located in the City of Los Angeles on the northwest corner of James M Wood Boulevard and South Westlake Avenue intersection.

Council District: 1; Gilbert Cedillo

Project Description: The Project would involve the demolition of an existing commercial retail building and related surface parking, for the construction of a new 6-story hotel above two levels of subterranean parking. The Project would contain 100 rooms on a 22,500-square-foot property. The Project would include approximately 100 automobile parking spaces, as well as 6 long-term and 6 short-term bicycle parking spaces. The Floor Area Ratio (FAR) of the proposed building would be 2.99:1 and the maximum height would be approximately 82 feet.

The Applicant has requested that the City approve (1) a General Plan amendment from Highway Oriented Commercial to Community Commercial and a modification to footnote No. 1 of the Westlake Community Plan's land use map to allow Height District 2, pursuant to 11.5.6 of the Los Angeles Municipal Code (LAMC); (2) a Vesting Zone Change and Height District Change from R4-1 and C2-1 to C2-2 to allow a maximum FAR of 2.99 (approximately 60,637 square feet), pursuant to Section 12.32F and 12.32Q of the LAMC; (3) a Conditional Use Permit to allow the construction, use, and maintenance of a hotel in the C2-2 zone and within 500 feet of any residence, pursuant to 12.24T and 12.24W.24 of the LAMC; and (4) permit for removal of street tree.

APPLICANT:

Infinitely Group, Inc.
611 South Westlake Avenue
Los Angeles, CA 90057

PREPARED BY:

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

ON BEHALF OF:

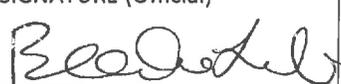
City of Los Angeles
Department of City Planning
Environmental Analysis Section

December 2017

CITY OF LOS ANGELES

CALIFORNIA ENVIRONMENTAL QUALITY ACT

PROPOSED MITIGATED NEGATIVE DECLARATION

LEAD CITY AGENCY: City of Los Angeles, Department of City Planning		COUNCIL DISTRICT: CD 1 – Gilbert Cedillo	
PROJECT 2005 James M Wood Boulevard Hotel Project	TITLE: ENVIRONMENTAL CASE: ENV-2017-713-MND	CASE NOS: CPC-2017-712-GPA-VZC-HD-VCU-SPR	
PROJECT LOCATION: The Project is located at 2005 James M Wood Boulevard in the City of Los Angeles, on the northwest corner of the James M Wood Boulevard and South Westlake Avenue intersection.			
PROJECT DESCRIPTION: The Project would involve the demolition of an existing commercial retail building and related surface parking, for the construction of a new 6-story hotel above two levels of subterranean parking. The Project would contain 100 rooms on a 22,500-square-foot property. The Project would include approximately 100 automobile parking spaces, as well as 6 long-term and 6 short-term bicycle parking spaces. The Floor Area Ratio (FAR) of the proposed building would be 2.99:1, and the maximum height would be approximately 82 feet. The Applicant has requested that the City approve (1) a General Plan amendment from Highway Oriented Commercial to Community Commercial and a modification to footnote No. 1 of the Westlake Community Plan's land use map to allow Height District 2, pursuant to 11.5.6 of the Los Angeles Municipal Code (LAMC); (2) a Vesting Zone Change and Height District Change from R4-1 and C2-1 to C2-2 to allow a maximum FAR of 2.99 (approximately 60,637 square feet), pursuant to Section 12.32F and 12.32Q of the LAMC; (3) a Conditional Use Permit to allow the construction, use, and maintenance of a hotel in the C2-2 zone and within 500 feet of any residence pursuant to 12.24T and 12.24W.24 of the LAMC; and (4) permit for removal of street tree.			
NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY: Infinitely Group, Inc. 611 South Westlake Avenue Los Angeles, CA 90057			
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.			
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 Kevin Golden	TITLE City Planner	TELEPHONE NUMBER 213-978-1396	
ADDRESS 200 N. Spring Street, 7 th Flor Los Angeles, CA 90012	SIGNATURE (Official) 	DATE Jan. 10, 2018	

SUMMARY OF MITIGATION MEASURES

Aesthetics: No mitigation measures are required.

Agriculture and Forestry Resources: No mitigation measures are required.

Air Quality:

- **MM-AIR-1: Off-road diesel-fueled heavy-duty construction equipment**

Off-road diesel-fueled heavy-duty construction equipment greater than 50 horsepower (hp) used for this Project and located on the Project site for a total of five (5) days or more shall meet at a minimum the United States Environmental Protection Agency (USEPA) Tier 3 emissions standards and the equipment shall be outfitted with Best Available Control Technology (BACT) devices including a CARB certified Level 3 Diesel Particulate Filter or equivalent control device.

Biological Resources:

- **MM-BIO-1: Habitat Modification (Nesting Native Birds, Non-Hillside or Urban Areas)**

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 (Fish and Game Code, Section 86).

If Project activities cannot feasibly avoid the breeding season, beginning 30 days prior to the disturbance of suitable nesting habitat, the Project Applicant shall:

- Arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within properties adjacent to the Project Site, as access to adjacent areas allows. The surveys shall be conducted by a qualified biologist with experience in conducting breeding bird surveys. The surveys shall continue on a weekly basis, with the last survey being conducted no more than 3 days prior to the initiation of clearance/construction work.
- If a protected native bird is found, the Project Applicant shall delay all clearance/ construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species until August 31.

- Alternatively, the qualified biologist could continue the surveys 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.
- The Project 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 Project.

Cultural Resources: No mitigation measures are required.

Geology and Soils: No mitigation measures are required.

Greenhouse Gas Emissions: No mitigation measures are required.

Hazards and Hazardous Materials: No mitigation measures are required.

Hydrology and Water Quality: No mitigation measures are required.

Land Use and Planning: No mitigation measures are required.

Mineral Resources: No mitigation measures are required.

Noise:

MM-NOI-1 Increased Noise Levels (Demolition, Grading, and Construction Activities)

- Demolition and construction activities shall be scheduled to avoid operating several pieces of equipment simultaneously, which causes high noise levels.
- Construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment, must be turned off when not in use for more than 30 minutes.
- Place noise-generating construction equipment and locate construction staging areas away from sensitive uses, where feasible.
- Stationary construction equipment, such as pumps, generators, or compressors, must be placed as far from noise-sensitive uses as feasible during all phases of Project construction.

- Implement noise-attenuation measures to the extent feasible, which may include but are not limited to temporary noise barriers or noise blankets around stationary construction noise sources.
- The power contractor shall use either plug-in electric or solar powered on-site generators to the extent feasible

Population and Housing: No mitigation measures are required.

Public Services: No mitigation measures are required.

Recreation: No mitigation measures are required.

Transportation and Traffic:

MM-TRAF-1: Work Area Traffic Management Plan

- The Project Applicant shall submit a formal Work Area Traffic Control Plan for review and approval by the Department of Building and Safety prior to the issuance of any construction permits. This plan shall incorporate safety measures around the site to reduce the risk to pedestrian traffic near the work area. This plan shall identify traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activity. This plan shall include:
 - 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 shall be adjacent to the 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.

Tribal Cultural Resources: No mitigation measures are required.

Utilities and Service Systems: No mitigation measures are required.

Mandatory Findings of Significance: Applicable mitigation measures have been stated above.

Initial Study
2005 James M Wood Boulevard Hotel Project
City of Los Angeles

Prepared for:

City of Los Angeles
Department of City Planning

Prepared by:

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

December 2017

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1.0 INTRODUCTION

Project Title: 2005 James M Wood Boulevard Hotel Project

Project Location: The Project is located in the City of Los Angeles on the northwest corner of James M Wood Boulevard and South Westlake Avenue intersection.

Project Applicants: Infinitely Group Inc.
611 South Westlake Avenue
Los Angeles, CA 90057

Lead Agency: City of Los Angeles
Department of City Planning
200 N. Spring Street
Los Angeles, CA 90012

PROJECT SUMMARY

The Project would involve the demolition of an existing commercial retail building and related surface parking, for the construction of a new 6-story hotel above two levels of subterranean parking. The Project would contain 100 rooms on a 22,500-square-foot property. The Project would include approximately 100 automobile parking spaces, as well as 6 long-term and 6 short-term bicycle parking spaces. The Floor Area Ratio (FAR) of the proposed building would be 2.99:1, and the maximum height would be approximately 82 feet.

The Applicant has requested that the City approve (1) a General Plan amendment from Highway Oriented Commercial to Community Commercial and a modification to footnote No. 1 of the Westlake Community Plan's land use map to allow Height District 2, pursuant to 11.5.6 of the Los Angeles Municipal Code (LAMC); (2) a Vesting Zone Change and Height District Change from R4-1 and C2-1 to C2-2 to allow a maximum FAR of 2.99 (approximately 60,637 sf), pursuant to Section 12.32F and 12.32Q of the LAMC; and (3) a Conditional Use Permit to allow the construction, use, and maintenance of a hotel in the C2-2 zone and within 500 feet of any residence, pursuant to 12.24T and 12.24W.24 of the LAMC.

ENVIRONMENTAL REVIEW PROCESS

This Initial Study is a preliminary analysis, prepared by and for the City of Los Angeles as the Lead Agency in compliance with the California Environmental Quality Act (CEQA), to determine whether an Environmental Impact Report (EIR), a Negative Declaration (ND), or a Mitigated Negative Declaration (MND) should be prepared for the Project. An MND is prepared when the Initial Study has identified potentially significant effects on the environment but (1) revisions in the project plans or proposals made by, or agreed to by, the Applicant before the proposed MND and Initial Study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effect 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 effect on the environment. Consequently, the analysis contained herein concludes that an MND should be prepared for the Project.

ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into six sections as follows:

Section 1.0, Introduction, provides introductory information such as the Project title, the Project Applicants, and the lead agency for the Project.

Section 2.0, Project Description, provides a detailed description of the Project, including the environmental setting, Project characteristics, related Project information, Project objectives, and environmental clearance requirements.

Section 3.0, Initial Study Checklist, includes the City of Los Angeles Initial Study Checklist showing the determination of the significance of potential environmental impacts of the Project.

Section 4.0, Environmental Analysis, includes discussion and analysis for each environmental topic and threshold listed in the Initial Study Checklist.

Section 5.0, List of Preparers, identifies the individuals who prepared this report.

Section 6.0, References, identifies all printed references cited in this Initial Study.

Appendices include Project-specific reports and data used to support the analysis in this Initial Study.

2.0 PROJECT DESCRIPTION

2.1 PROJECT LOCATION

The Project is in the Westlake South neighborhood and within the Westlake Community Plan area of the City of Los Angeles, as shown in **Figure 2.0-1, Regional Location Map**. The Project is in the City of Los Angeles on the northwest corner of James M Wood Boulevard and South Westlake Avenue intersection, as shown in **Figure 2.0-2, Aerial Photograph of the Project Site**.

2.2 EXISTING SITE CONDITIONS

The Project site is approximately 22,500 square feet (0.52 acres) in area and is currently developed with a 1-story, 8,228-square-foot commercial retail structure and related surface parking lot. The commercial property is accessed through driveways along James M Wood Boulevard, South Westlake Boulevard, and the alley on the western Project site border. Landscaping on the Project site is characterized by minimal shrubs and some grasses along the perimeter of the commercial property. There is one palm tree within the sidewalk bordering the site.

The current addresses for the Project site include 2005 and 2009 James M Wood Boulevard; and 857 South Westlake Boulevard. The Project site consists of three parcels (Bonnie Brae Tract) that are linked together under Assessor's Parcel Number (APN) 5141-020-021, as shown in **Figure 2.0-3, Existing Zoning and Parcels Map**.

2.3 ZONING AND LAND USE DESIGNATIONS

As shown in **Figure 2.0-4, Westlake Community Plan Map**, the Project is in the Westlake Community Plan Area. The Westlake Community Plan Map designates the Project site as Highway Oriented Commercial (HOC). The north half of the Project site is zoned R4-1 (Multiple Dwelling Zone); the southern 2 parcels are zoned C2-1 (Commercial Zone). The C2 Commercial Zone permits a variety of commercial uses: retail with limited manufacturing; service stations and garages; and office uses, hotels, and hospitals. The C2 Zone also permits R4 residential uses, as well as churches, schools, and childcare. The R4 Multiple Dwelling Zone permits group dwellings, multiple dwellings, and apartment buildings to a density of 400 square feet of lot size per unit. The Height District No. 1 designation limits the FAR to 1.5:1 for commercial uses and to 3:1 for residential uses.

The purpose of the HOC Zone is to provide for a zoning district that would allow the development of individual retail and service businesses primarily oriented toward serving the traveling/transient public or which require immediate access to the regional transportation system.

2.4 SURROUNDING LAND USES

The Project site is in an urbanized area of Los Angeles. Surrounding uses include a mix of commercial and residential uses and surface parking lots. To the north, east and southeast are multistory, multifamily residential buildings; to the west is a multistory church; to the south are a restaurant and related surface parking lot, with multifamily residential buildings beyond that. Further to the west are single-story commercial businesses.

2.5 ACCESS

Regional Access

Primary regional access to the Project site is provided by State Route (SR) 110, which runs in a north–south direction east of the Project site, and Interstate 10 (I-10) which runs in an east–west direction to the south of the Project site. Additional regional access to the Project site is provided by the US Route 101/Hollywood Freeway (US 101), which generally runs in an east–west direction to the north of the Project site.

Local Street Access

Local street access is provided by a grid roadway system encompassing the Project site and surrounding area. James M Wood Boulevard, which borders the Project site to the south, runs in an east–west direction along the Project site. James M Wood Boulevard generally provides two travel lanes in each direction and is classified as an Avenue III, which is a Secondary Highway that has been developed to maintain the roadway width in some of the older, more historic parts of the City. South Westlake Avenue, east of the Project site, is classified as a Local Street—Standard and runs in a north–south direction, with one travel lane in each direction. Alvarado Street is the closest street to the west of the Project site; it runs in a north–south direction and provides two travel lanes in each direction. It is classified as an Avenue II, which is a Secondary Highway typically located in parts of the City with dense active uses, an active pedestrian environment, and a limited demand for new development.¹

Public Transit

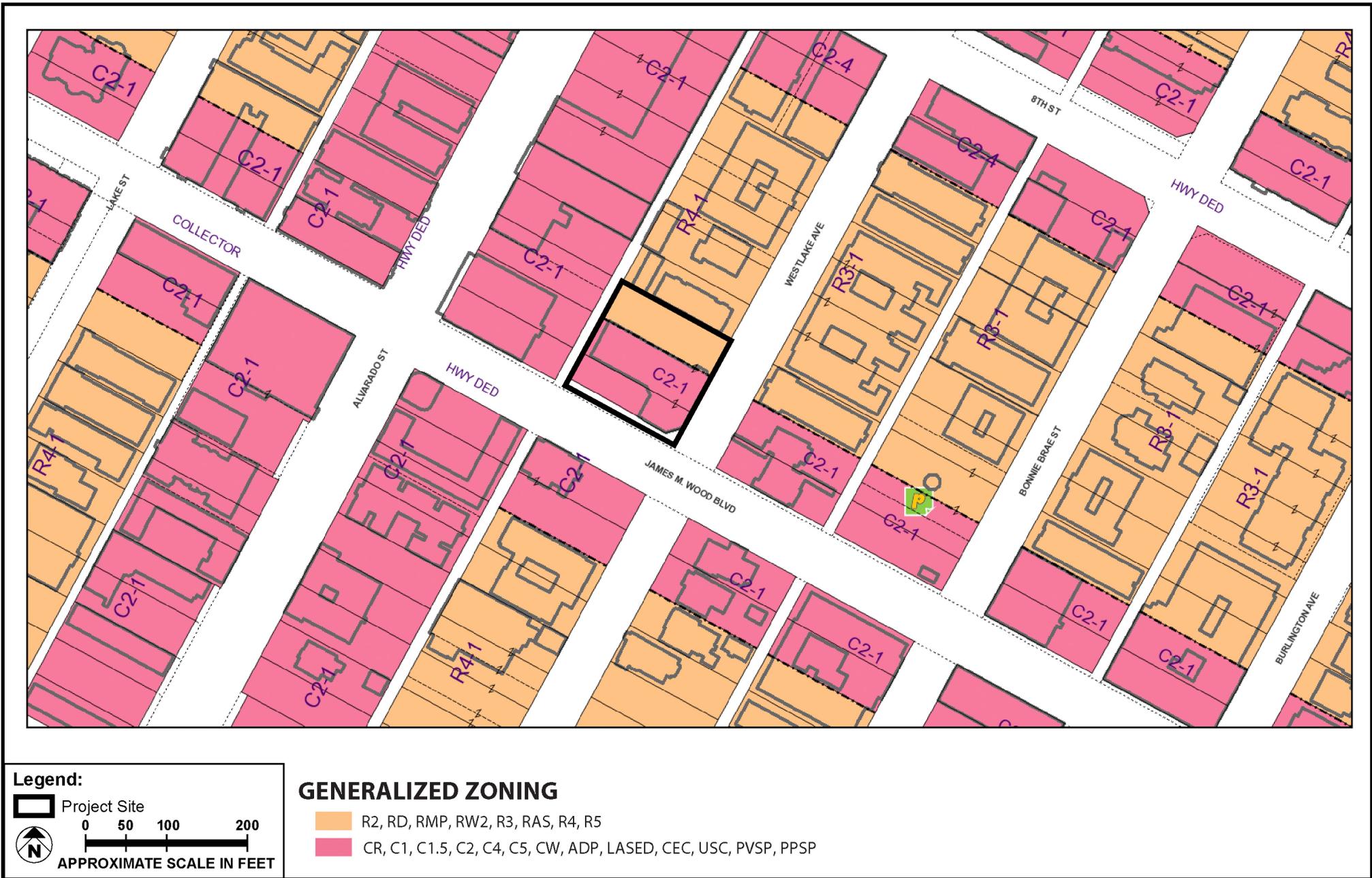
The Project site is well served by both regional and local public transit. Specifically, the Los Angeles County Metropolitan Transportation Authority (“Metro”) and the Los Angeles Department of Transportation (LADOT) provide access to and from the Project area. The Metro Bus Line 200 runs along James M Wood Boulevard, with a stop at the intersection of South Alvarado Street and James M Wood Boulevard.²

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- 1 City of Los Angeles, *City of Los Angeles General Plan, “Mobility Plan 2035”* (2015), Citywide General Plan Circulation System Map A4—Central, Midcity Subarea.
 - 2 Metro, “Maps & Timetables,” <http://www.metro.net/riding/maps/>, accessed June 2017.



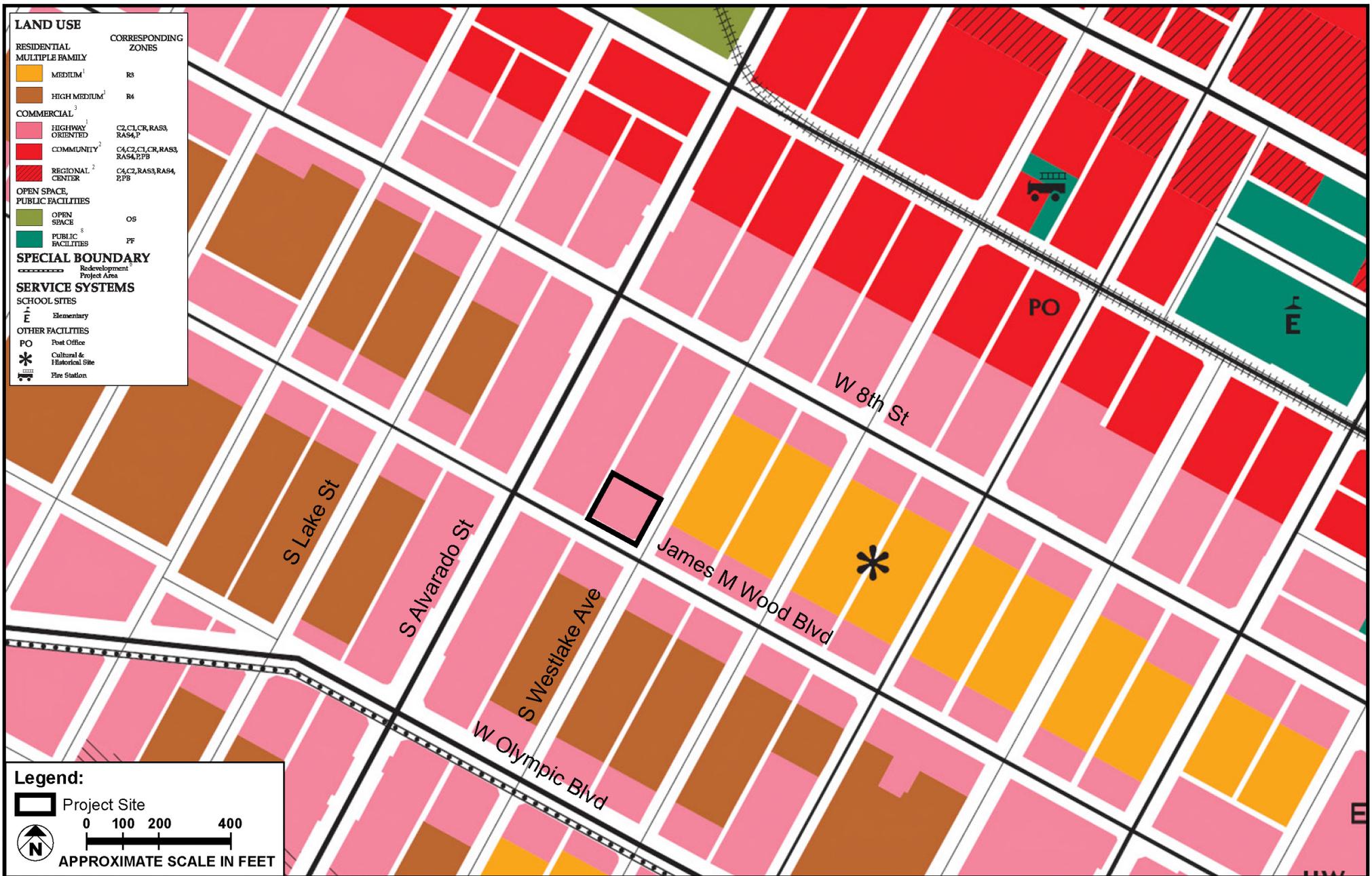
SOURCE: Google Earth - 2017

FIGURE 2.0-2



SOURCE: ZIMAS, Streets Copyright © Thomas Brothers Maps, Inc, Accessed March 2017

FIGURE 2.0-3



SOURCE: Westlake Community Plan - 2015

FIGURE 2.0-4

2.6 PROJECT CHARACTERISTICS

The Project Applicant has proposed to demolish the existing commercial retail building and related surface parking on the Project site and to construct a 6-story hotel containing 100 rooms above 2 levels of subterranean parking. The building would be 82 feet in height, with an FAR of 2.99:1.

The Project would require 59 parking spaces, and 100 parking spaces would be provided. **Figure 2.0-5, Floor Plan—Level B1**, depicts one of the two levels of subterranean parking. These subterranean levels would contain the hotel guest parking and would include 6 short-term and 6 long-term bicycle parking spaces.

As shown in **Figure 2.0-6, First-Floor Plan**, the ground floor would include the hotel lobby and other hotel administration areas, a breakfast space, and entrance to the subterranean parking levels. Additional office and storage space would be provided on the Mezzanine level, shown in **Figure 2.0-7, Mezzanine Floor Plan**. As shown in **Figure 2.0-8, Second-Floor Plan**, this floor has access to the hotel courtyard and pool as well as guest rooms and **Figure 2.0-9, Third- through Sixth-Floor Plan** contains the remaining hotel guest rooms. **Figure 2.0-10, Section View** depicts a side view of the hotel, with a summary of what each floor would contain. **Figure 2.0-11, South and East Elevations** and **Figure 2.0-12, North and West Elevation**, show each side of the proposed Project.

2.7 APPROVAL ACTIONS

To implement the Project, the Applicant is requesting that the City take the following actions:

- 1) Pursuant to LAMC Section 11.5.6, a General Plan amendment from Highway Oriented Commercial to Community Commercial, and a modification to footnote No. 1 of the Westlake Community Plan's land use map to allow Height District 2;
- 2) Pursuant to LAMC Section 12.32F and 12.32Q, a Vesting Zone Change and Height District Change from R4-1 and C2-1 to C2-2 to allow a maximum FAR of 2.99 (approximately 60,637 sf);
- 3) Pursuant to LAMC Section 12.24T and 12.24 W.24, a Conditional Use Permit to allow the construction, use, and maintenance of a hotel in the C2-2 zone and within 500 feet of any residence;
- 4) Permit to remove one street tree.

In addition to the entitlements identified above, the following approvals are also required from other City entities for the Project, including, but not limited to, approvals and permits from the City's Department of Building and Safety and Public Works (and other municipal agencies) for Project construction activities including, but not limited to the following: demolition, haul route, excavation, shoring, grading, foundation, building and interior improvements and the removal of trees on public and/or private property.

2.8 CONSTRUCTION

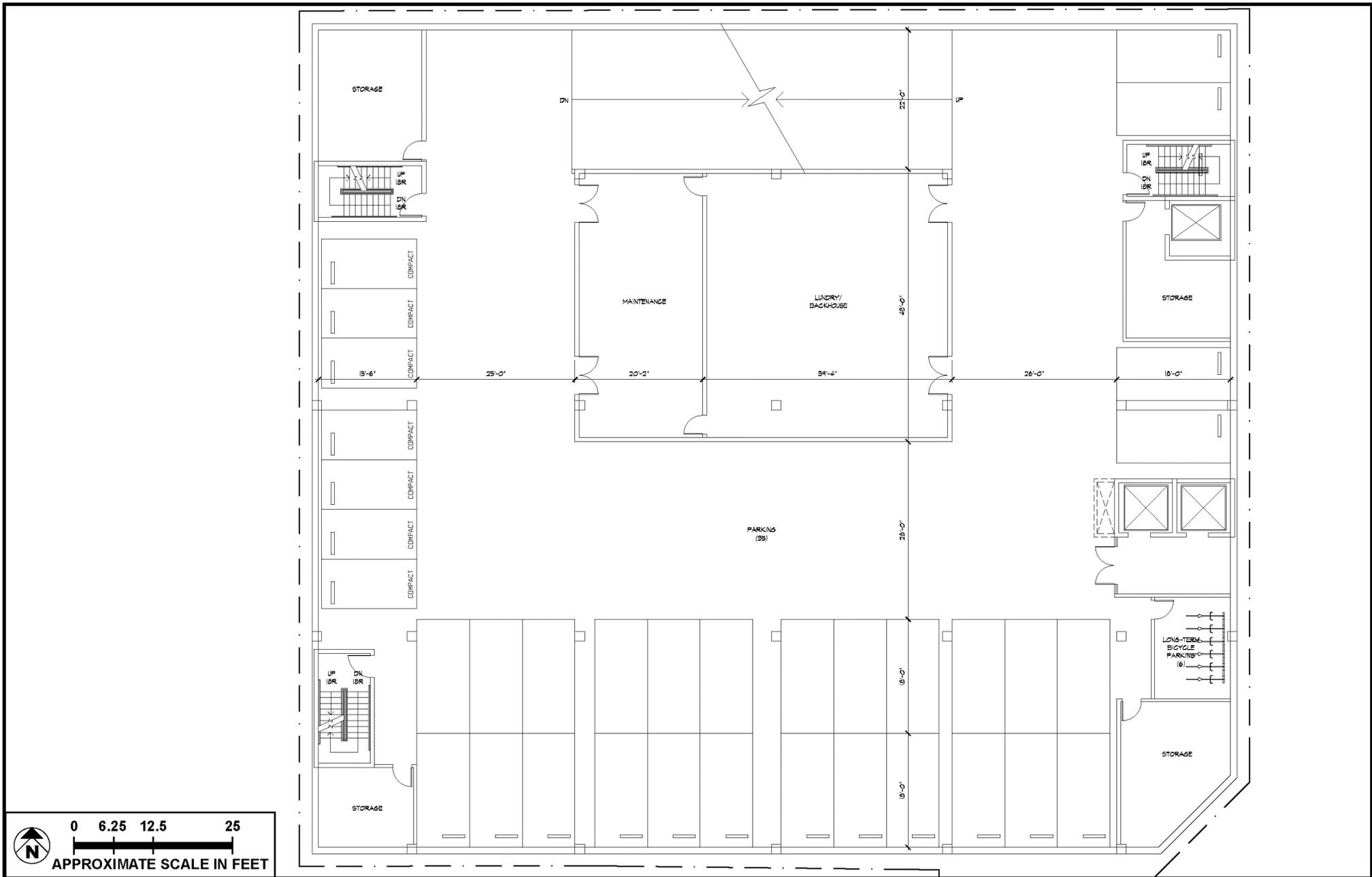
The construction of the Project, including demolition, would take approximately 18 months from start to finish. Construction activities associated with the Project would be undertaken in three main steps: (1) demolition/site clearing, (2) site preparation, and (3) building construction.

Construction of the Project would commence with demolition and site-clearing activities. All existing improvements on the Project site would be removed. Construction and demolition debris would be recycled to the maximum extent feasible.

After the completion of site clearing, excavation for two subterranean levels of parking would begin. Approximately 16,590 cubic yards of soil would be removed from the Project site and taken to an approved landfill. The Project would require a haul route permit that would specify the truck route to and from the Project site. The anticipated haul route would direct trucks to reach the Project site via the West 8th Street exit on Interstate 10, then west along West 8th Street and south on South Westlake Avenue. Similarly, trucks would be directed from the Project site traveling north on South Westlake Avenue and east on West 8th Street to the Interstate 10.

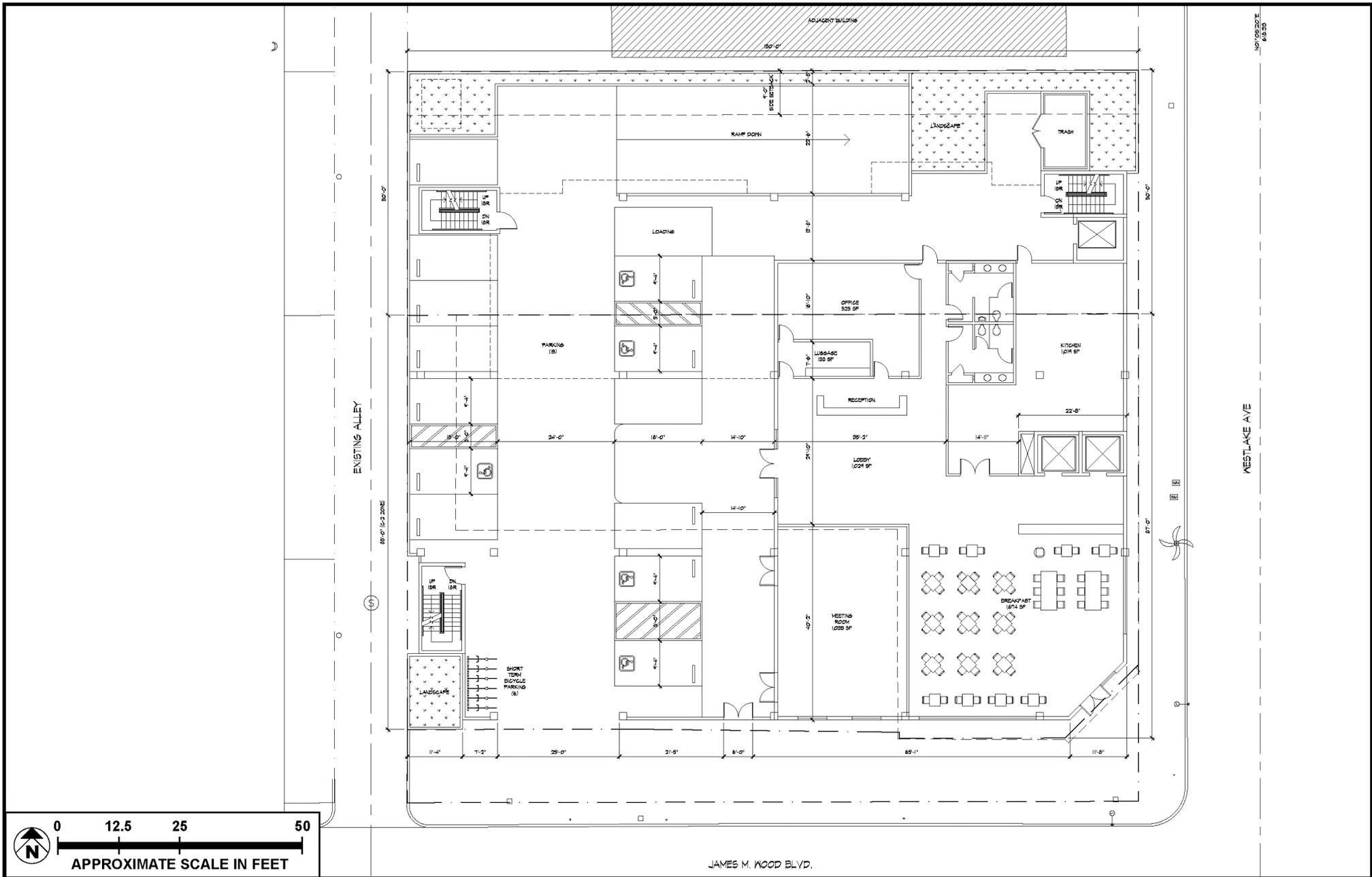
Construction activities may necessitate temporary lane closures on streets adjacent to the Project site on an intermittent basis for utility relocations/hookups, delivery of materials, and other construction activities as needed. Site deliveries and staging of all equipment and materials would be organized on-site in the most efficient manner possible 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, will be properly permitted by the City and will conform to City standards.

Unless stated otherwise, 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 stated in Section 41.40 of the Los Angeles Municipal Code (LAMC), the permissible hours of construction involving noise-generating equipment 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 Project would comply with these restrictions.



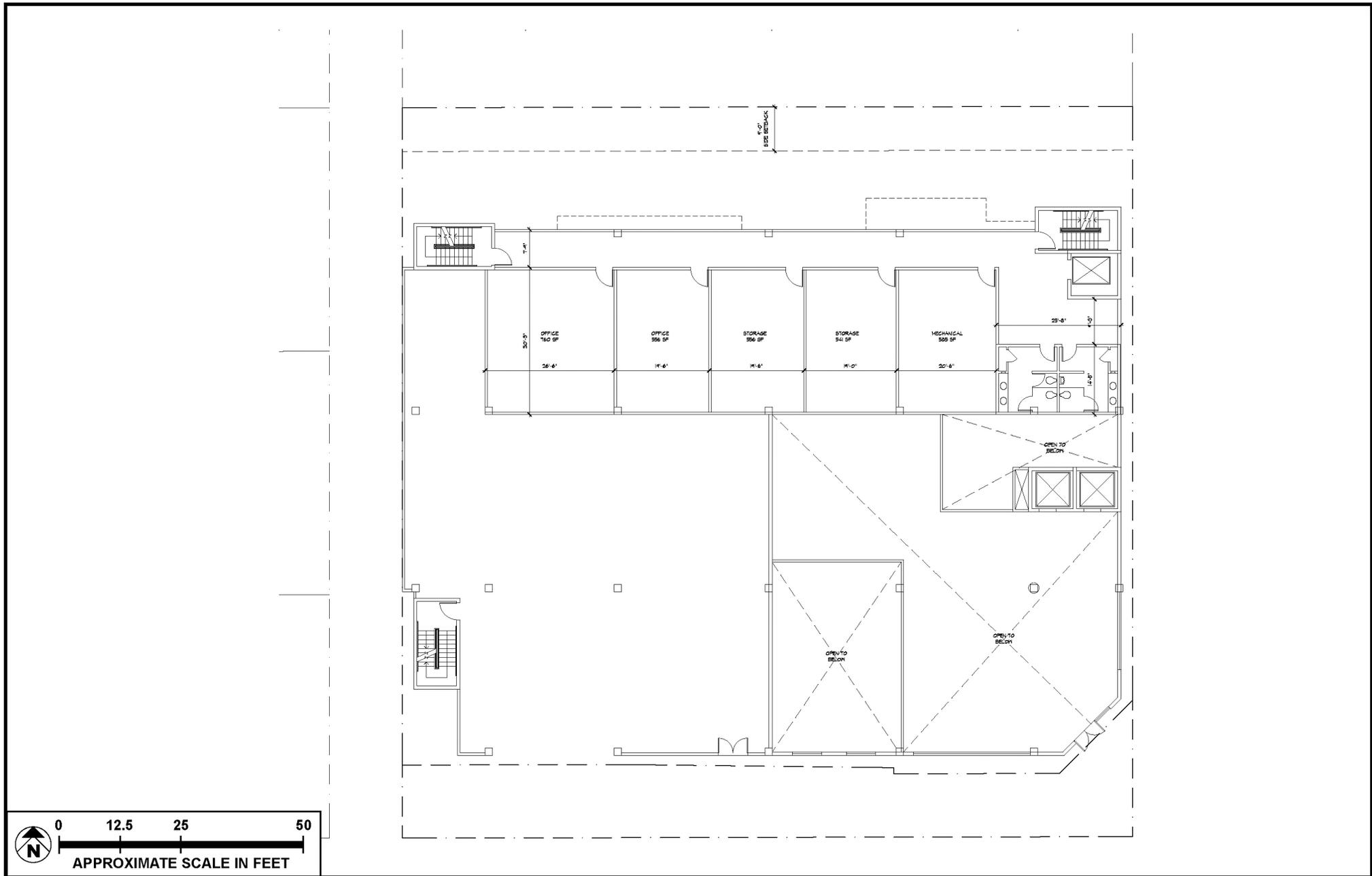
SOURCE: JWDA-MS Architects - Jan 2017

FIGURE 2.0-5



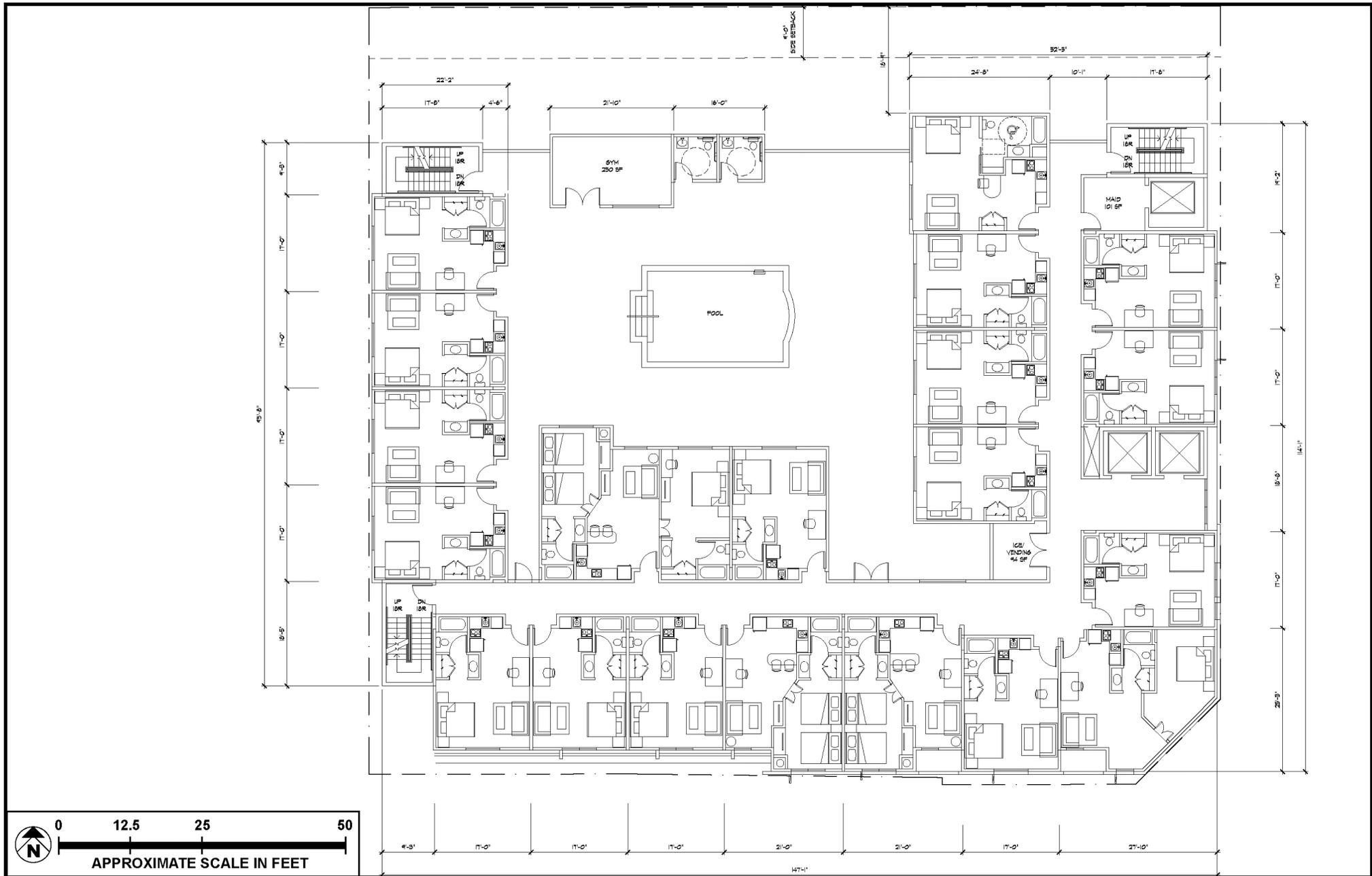
SOURCE: JWDA-MS Architects - Jan 2017

FIGURE 2.0-6



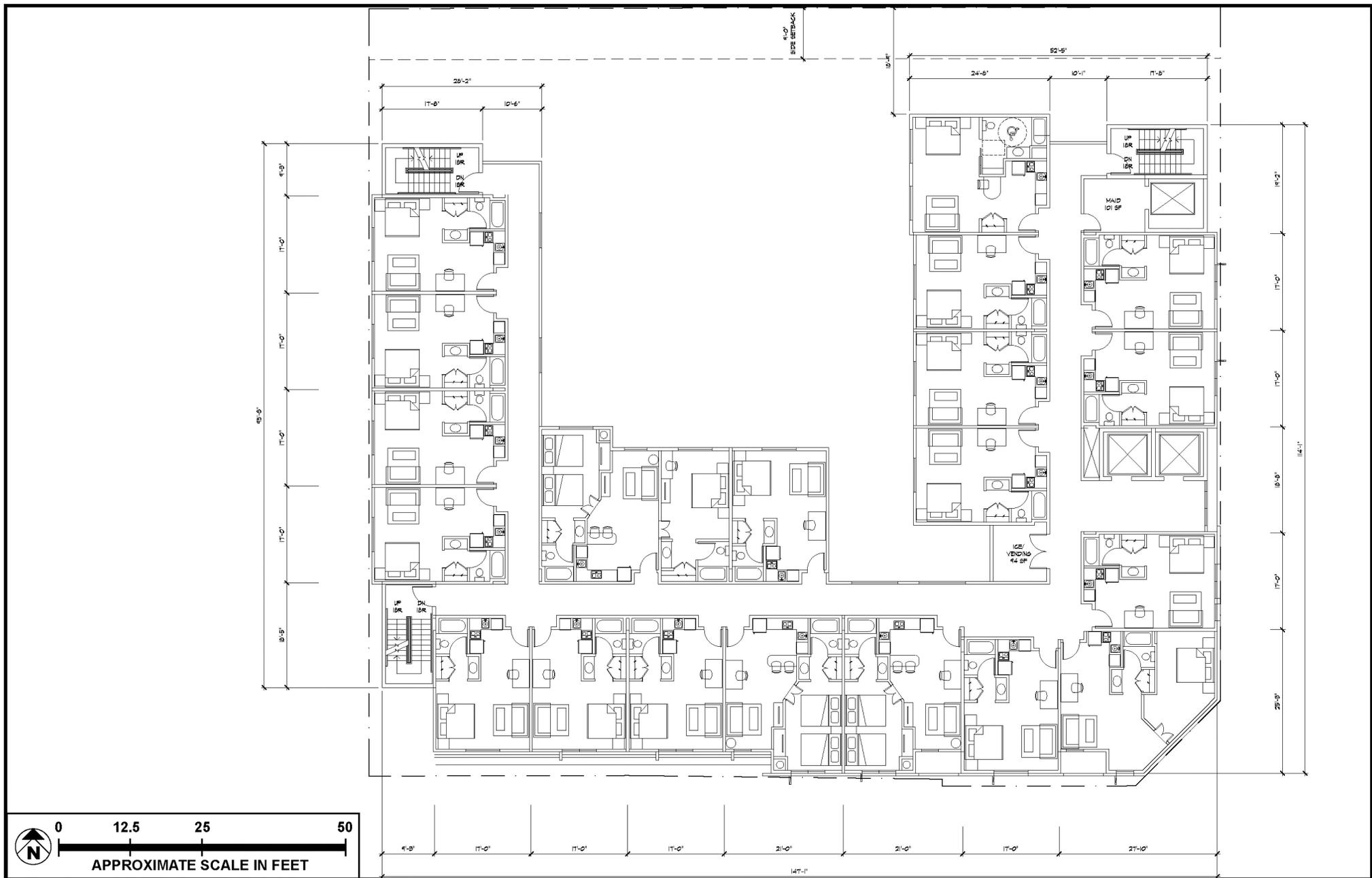
SOURCE: JWDA-MS Architects - Jan 2017

FIGURE 2.0-7



SOURCE: JWDA-MS Architects - Jan 2017

FIGURE 2.0-8

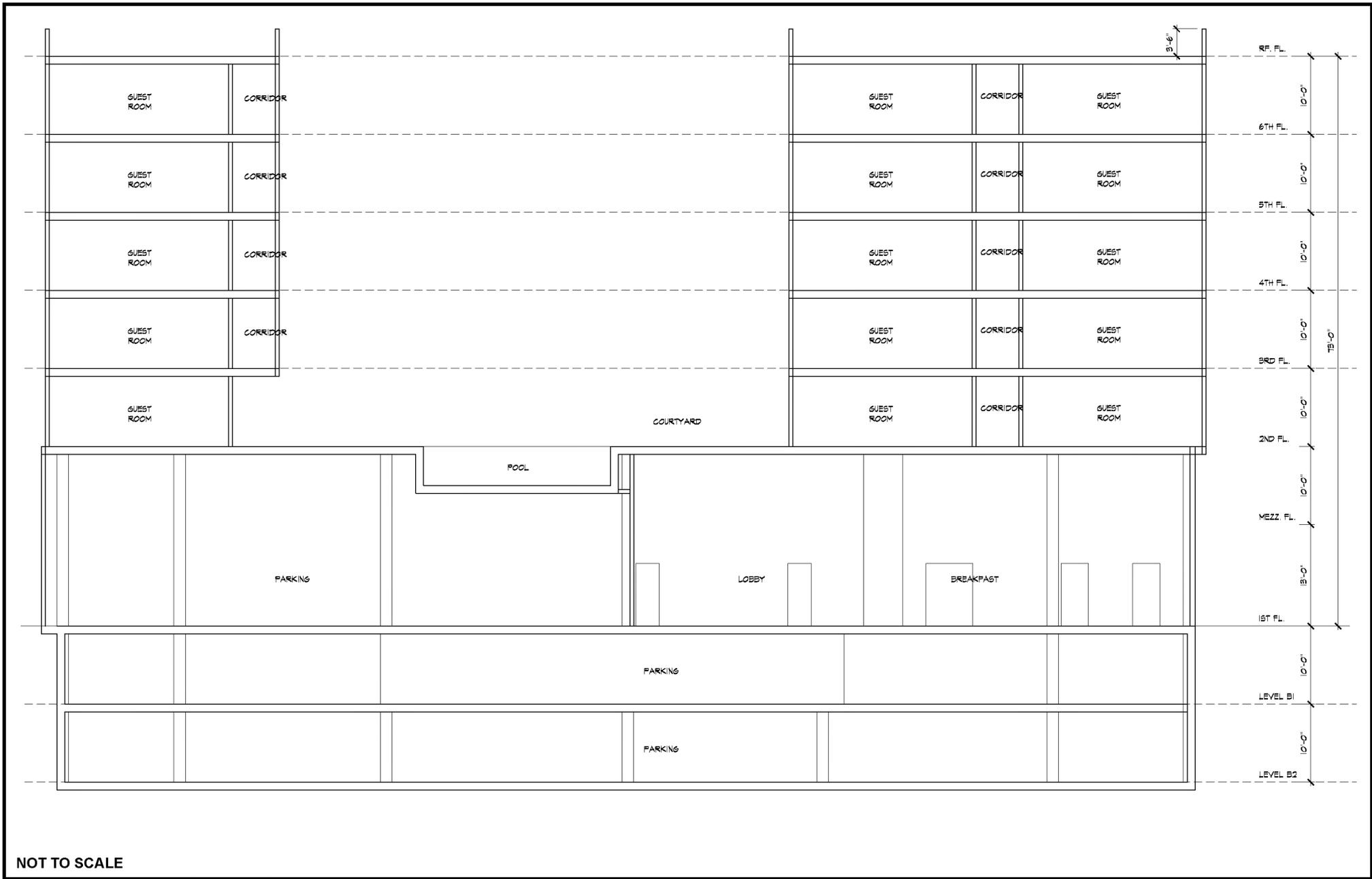


SOURCE: JWDA-MS Architects - Jan 2017

FIGURE 2.0-9

Meridian
Consultants

Third- through Sixth-Floor Plan



SOURCE: JWDA-MS Architects - Jan 2017

FIGURE 2.0-10



EAST ELEVATION

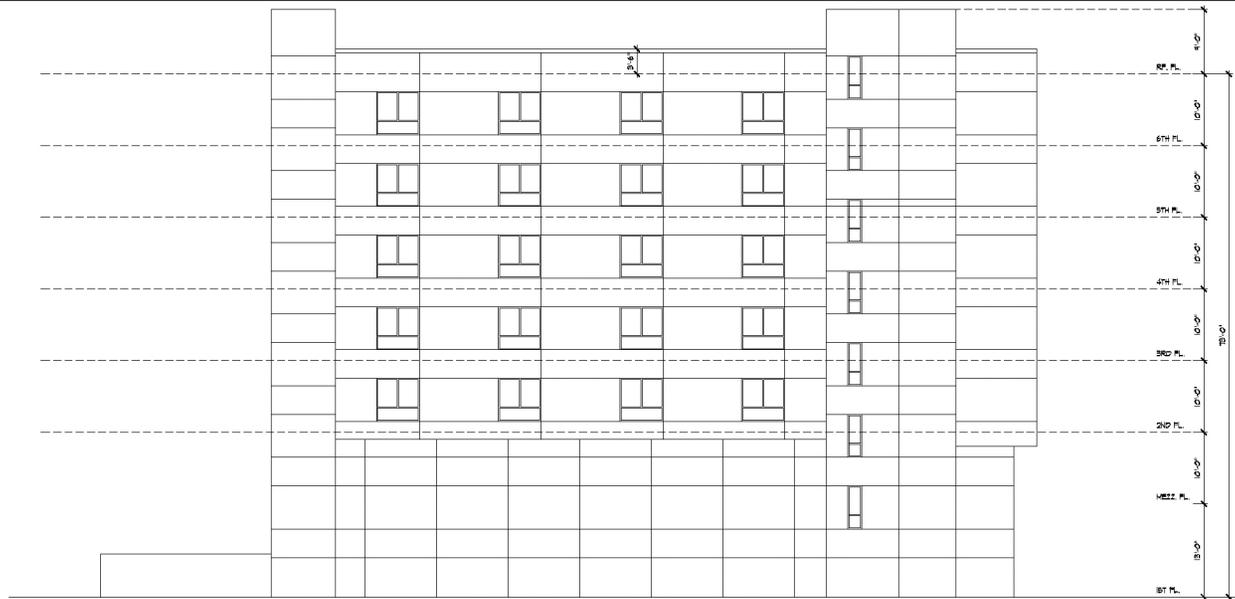


SOUTH ELEVATION

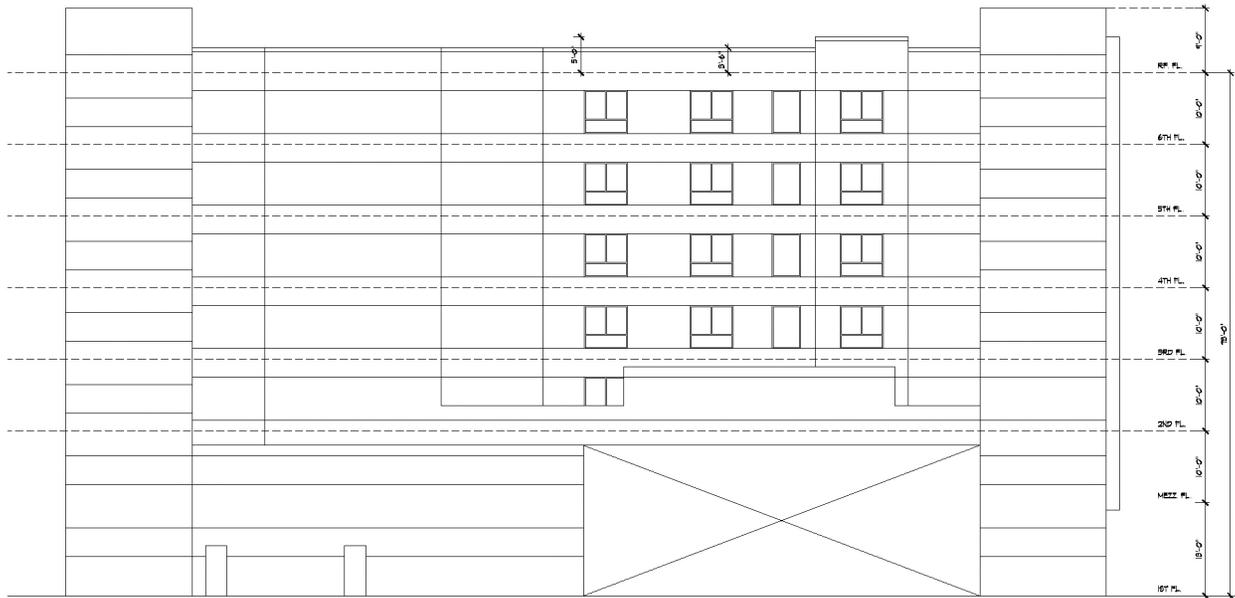
NOT TO SCALE

SOURCE: JWDA-MS Architects - Jan 2017

FIGURE 2.0-11



WEST ELEVATION



NORTH ELEVATION

NOT TO SCALE

SOURCE: JWDA-MS Architects - Jan 2017

FIGURE 2.0-12

3.0 INITIAL STUDY CHECKLIST

CITY OF LOS ANGELES
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 1 – Gilbert Cedillo.	DATE: XXX
RESPONSIBLE AGENCIES: Southern California Air Quality Management District Los Angeles Regional Water Quality Control Board		
PROJECT TITLE: 2005 James M Wood Boulevard Hotel Project	ENVIRONMENTAL CASE: ENV-2017-713-EAF	CASE NOS: CPC-2017-712-GPA-VZC-HD-VCU-SPR
PREVIOUS ACTIONS CASE NO. No recent activity.	<input type="checkbox"/> DOES have significant changes from previous actions. <input checked="" type="checkbox"/> DOES NOT have significant changes from previous actions	
PROJECT LOCATION: The Project is located in the City of Los Angeles on the northwest corner of James M Wood Boulevard and South Westlake Avenue intersection.		
PROJECT DESCRIPTION: See Section 2.0 of this Initial Study.		
ENVIRONMENTAL SETTING: See Section 2.0 of this Initial Study.		
COMMUNITY PLAN AREA: Westlake STATUS: <input type="checkbox"/> Preliminary <input type="checkbox"/> Does Conform to Plan <input type="checkbox"/> Proposed <input checked="" type="checkbox"/> Does NOT Conform to Plan <input checked="" type="checkbox"/> Adopted in 2001	AREA PLANNING COMMISSION: Central	CERTIFIED NEIGHBORHOOD COUNCIL: Westlake South
EXISTING ZONING: C2-1, R4-1	MAX DENSITY ZONING: 1.5:1 commercial FAR and 3.0:1 residential FAR	LA River Adjacent: No
GENERAL PLAN LAND USE: Highway Oriented Commercial	MAX. DENSITY PLAN: Same as zoning	PROPOSED PROJECT DENSITY: 2.99:1 FAR

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

City Planner

(213) 978-1396

		Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
EACH DETERMINATION IN THIS INITIAL STUDY CHECKLIST IS BASED UPON SECTION 4.0, ENVIRONMENTAL ANALYSIS. PLEASE REFER TO THE APPLICABLE SECTION THEREIN FOR A DETAILED DISCUSSION OF THE CHECKLIST DETERMINATIONS.					
1. AESTHETICS					
<i>Would the project:</i>					
a.	Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>
c.	Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>
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 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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"/>
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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

		Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
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 type="checkbox"/>	<input checked="" 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. 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 The California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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 type="checkbox"/>	<input checked="" 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"/>
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	Less than Significant with Project Mitigation	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"/>
6. GEOLOGY AND SOILS					
<i>Would the project:</i>					
Exacerbate existing hazardous environmental conditions by bringing people or structures into areas that are susceptible to potential substantial adverse effects, including the risk of loss, injury, or death involving:					
a.	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"/>
b.	Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d.	Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e.	Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f.	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 caused in whole or in part by the project's exacerbation of the existing environmental conditions?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g.	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 caused in whole or in part by the project exacerbating the expansive soil conditions?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h.	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"/>
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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

		Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
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"/>
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 exacerbate the current environmental conditions so as to create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 exacerbate current environmental conditions so as to 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 exacerbate current environmental conditions so as to 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"/>
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.	Exacerbate existing hazardous environmental conditions by bringing people or structures into areas that are susceptible 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"/>
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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

3.0 Initial Study Checklist

		Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
	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)?				
c.	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 offsite?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 checked="" type="checkbox"/>	<input 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 type="checkbox"/>	<input checked="" type="checkbox"/>
j.	Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

		Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
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, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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"/>
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"/>
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 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"/>
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"/>

		Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
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 checked="" type="checkbox"/>	<input 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"/>
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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii.	Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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"/>
v.	Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>
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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

		Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
	but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths and mass transit?				
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 type="checkbox"/>	<input checked="" type="checkbox"/>
c.	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d.	Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e.	Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
17. TRIBAL CULTURAL RESOURCES					
<i>Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</i>					
a.	Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
18. 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 checked="" type="checkbox"/>	<input 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"/>

		Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
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 checked="" type="checkbox"/>	<input 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"/>
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"/>
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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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"/>

4.0 ENVIRONMENTAL ANALYSIS

This section contains an assessment of impacts associated with the issues and subject areas identified in the Initial Study Checklist. The thresholds of significance are based on the L.A. *CEQA Thresholds Guide*.

4.1 AESTHETICS

Senate Bill (SB) 743, effective January 1, 2014, deems the aesthetic impacts of employment center projects located on an infill site and in defined Transit Priority Areas (TPA) as less than significant under CEQA.³ Zoning Information File (ZI) No. 2451 issued by the Planning Department, includes a corresponding map of TPAs that identifies the Project site as within the TPA associated with the Westlake/MacArthur Park station of the Red and Purple lines, approximately ½ mile from the Project site.

An employment center project is defined as a project located on property zoned for commercial uses with a FAR of no less than 0.75 within a TPA. As previously mentioned, two of the three parcels for the proposed Project are zoned for commercial uses. The third parcel is zoned R4-1 Multiple Dwelling Zone, which allows some commercial uses. Additionally, an approval item under the proposed Project is to change the Project zoning to C2-2 (commercial uses), thus the Project would be consistently zoned for commercial uses per SB 743.

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 project is provided for informational purposes only.

Impact Analysis

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

Less than Significant Impact. Based on the L.A. *CEQA Thresholds Guide*, a significant impact could occur for non-SB 743 projects if the Project introduced incompatible visual elements within a field of view containing a scenic vista or substantially blocked views of a scenic vista. Scenic vistas are generally described in two ways: panoramic views (visual access to a large geographic area, for which the field of view can be wide and extend into the distance) and focal views (visual access to a particular object, scene, or feature of interest).

The Project site is within the Westlake South neighborhood in the Westlake Community Plan area of the City of Los Angeles. The Project site is not located within or along a designated scenic corridor or roadway.

3 The Governor's Office of Planning and Research, Changes to CEQA for Transit Oriented Development, Senate Bill 743 (Steinberg, 2013).

The Project site is within the field of view of surrounding mountain ranges. However, the existing level of development on the site and in the surrounding area limits views across and beyond the site from surrounding roadways. As such, and given that the Project is within a Transit Priority Area, and falls under the aforementioned exemption to aesthetic impacts, impacts would be less than significant.

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?

Less than Significant Impact. Based on the *L.A. CEQA Thresholds Guide*, a significant impact could occur for non-SB 743 projects if existing structures on the Project site have been identified as a scenic resource. The Project site is not bordered by or within the viewshed of a designated scenic highway. No historic buildings, rock outcroppings, or unique geologic features exist on the Project site. As such, and given that the Project is within a Transit Priority Area, and falls under the aforementioned exemption to aesthetic impacts, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

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

Less than Significant Impact. Based on the *L.A. CEQA Thresholds Guide*, a significant impact could occur for non-SB 743 projects if the Project were to introduce incompatible visual elements on the Project site or visual elements that would be incompatible with the character of the area surrounding the Project site.

Building Heights and Massing

With respect to building mass and height, land uses within the Project vicinity vary in use and height. Within the Westlake area, commercial retail, office, restaurant, parking, residential, and mixed-use land uses exist ranging in various heights. Buildings close to the Project site are considered low to medium rise in height, ranging from 1 to 5 stories. The proposed building in the Project site would be 6 stories and approximately 82 feet in height. Though the proposed building would be taller than buildings immediately adjacent, it would be consistent with the overall visual character of Westlake. As such, and given that the Project is within a Transit Priority Area, and falls under the aforementioned exemption to aesthetic impacts, impacts would be less than significant.

Views

At a height of approximately 82 feet above grade, the proposed hotel building may be visible from private viewpoints within commercial or residential buildings in the Westlake South neighborhood. Existing views

toward the Los Angeles skyline or the Hollywood Hills from these vantage points may be obstructed as a result of the Project. However, 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 because the general characteristics of the urban setting would not be altered. The Project would be consistent with the general visual character of Westlake South when viewed from a distance. As such, and given that the Project is within a Transit Priority Area, and falls under the aforementioned exemption to aesthetic impacts, impacts would be less than significant.

Streetscape

The façade of the proposed building would be articulated with geometric forms and variations in color. The center of the James M Wood Boulevard front would feature an entry plaza. These design elements are intended to create visual interest that mitigate the visual effect of the building mass. As such, and given that the Project is within a Transit Priority Area, and falls under the aforementioned exemption to aesthetic impacts, impacts would be less than significant.

Shade and Shadow

Based on the *L.A. CEQA Thresholds Guide*, a shading impact would normally be considered significant if the proposed Project's structure cast shadows on shade sensitive uses for more than 3 hours each day between the hours of 9:00 AM and 3:00 PM during winter months, or for more than 4 hours each day between the hours of 9:00 AM and 5:00 PM during the summer months. Shade sensitive uses include routinely useable outdoor spaces associated with residential, recreational, or institutional land uses; commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; and existing solar collectors. The Project would cast shadows across neighboring buildings to the northeast, north and northwest. At 82 feet high, the Project could cast shadows as long as 250 feet.⁴ No specific outdoor spaces or shade sensitive uses would be affected that are not already subjected to shadow from existing structures. As such, and given that the Project is within a Transit Priority Area, and falls under the aforementioned exemption to aesthetic impacts, impacts would be less than significant.

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?

Less than Significant Impact. Based on the *L.A. CEQA Thresholds Guide*, a significant impact could occur for non-SB 743 projects if the Project introduces new sources of light or glare on or from the Project site

4 *L.A. CEQA Thresholds Guide*, Exhibit A.3-2.

that would be incompatible with the areas surrounding the Project site, or which pose a safety hazard to motorists using adjacent streets or freeways. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the Project results in a significant nighttime illumination impact shall be made considering the change in ambient illumination levels as a result of Project sources and the extent to which Project lighting would spill off the Project site and affect adjacent light-sensitive areas.

Light

Night lighting for the Project site would be provided to illuminate the building entrances and common open space areas, and largely to provide adequate night visibility for hotel guests and to provide a measure of security. The Project site would utilize outdoor lighting designed and installed to meet City Code requirements for shielding. In general, lighting would be typical of the existing structures found in the surrounding area. As such, and given that the Project is within a Transit Priority Area and falls under the aforementioned exemption for aesthetic impacts, impacts would be less than significant.

Glare

Potential reflective surfaces in the Project site vicinity include automobiles, exterior building windows, and other glass and polished metal surfaces. Excessive glare not only restricts visibility, but also increases the ambient heat reflectivity in a given area. The Project site's architectural materials would include a mix of glass, metal, and wood panels. While distinct in style, the Project would utilize materials and finishes typical of the modern existing structures in the surrounding area. As such, and given that the Project is within a Transit Priority Area and falls under the aforementioned exemption for aesthetic impacts, impacts would be less than significant.

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. The Project site is within a developed and heavily urbanized area within the City of Los Angeles. No farmland or agricultural activity exists on or near the Project site. According to the California Department of Conservation “Los Angeles County Important Farmland 2012” map, the Project site is designated as “urban and built-up land.”⁵ No portion of the Project site is designated as Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance. 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. The Project site is within the jurisdiction of the City of Los Angeles and is subject to the applicable land use and zoning requirements of the LAMC. The Project site has a land use designation of Highway Oriented Commercial and is zoned for commercial uses [C2-1] and residential uses [R4-1]. As such, the Project site is not zoned for agricultural production, and there is no farmland at the Project site. In addition, no Williamson Act Contracts are in effect for the Project site.⁶ No impacts would occur.

Mitigation Measures: No mitigation measures are necessary.

5 California Department of Conservation, Division of Land Resource Protection, “Los Angeles County Important Farmland 2012,” map (January 2015), <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2012/los12.pdf>.

6 California Department of Conservation, Division of Land Resource Protection, “The Land Conservation (Williamson) Act” (2013), <http://www.conservation.ca.gov/dlrp/lca/Pages/Index.aspx>.

- 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. The Project site has a land use designation of Highway Oriented Commercial and is zoned for commercial uses [C2-1] and multiple dwelling zone uses [R4-1]. As such, the Project site is not zoned as forest land or timberland, and there is no timberland production at the Project site. 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. The Project site is currently developed with a single-story commercial retail complex and related surface parking. No forested lands or natural vegetation exists on or near the 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. Neither the Project site, nor nearby properties, are currently utilized for agricultural or forestry uses. The Project site is not classified in any "Farmland" category designated by the State of California. 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 *L.A. CEQA Thresholds Guide*, a significant air quality impact could occur if the Project is not consistent with the applicable Air Quality Management Plan (AQMP) or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of that plan. The South Coast Air Management District (SCAQMD) is the agency principally responsible for comprehensive air pollution control in the South Coast Air Basin (“Basin”). To that end, the SCAQMD, a regional agency, works directly with the Southern California Association of Governments (SCAG), county transportation commissions, and local governments. In addition, the SCAQMD cooperates actively with all State and federal government agencies to develop rules and regulations; establishes permitting requirements; inspects emissions sources; and enforces such measures through educational programs or fines, when necessary. Projects that are consistent with the projections of employment and population forecasts identified in the Growth Management chapter of the 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.

The Project would not conflict with the control strategies intended to reduce emissions from construction equipment, the Project would not conflict with or obstruct implementation of 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?

Less than Significant Impact; Based on the *L.A. CEQA Thresholds Guide*, the Project could have a significant impact where Project-related emissions would exceed Federal, State, or regional standards or thresholds, or where Project-related emissions would substantially contribute to an existing or projected air quality violation. The Project would contribute to regional and localized air pollutant emissions during construction and Project operation. The applicable air quality standards and the calculated emissions associated with the Project are discussed in the Air Quality and Greenhouse Gas Technical Report included as **Appendix A** of this Initial Study. The analysis of construction emissions associated with the Project has been prepared utilizing CalEEMod (version 2016.3.1), an emissions modeling software program recommended by the SCAQMD. **Table 4.3-1, Maximum Unmitigated Construction Emissions**, identifies daily emissions that are estimated for peak construction days for each construction phase on and off site.

**Table 4.3-1
Maximum Unmitigated Construction Emissions (pounds/day)**

Source	VOC	NOx	CO	SOx	PM10	PM2.5
Demolition	3	34	18	<1	4	2
Site Preparation	2	18	9	<1	3	2
Grading/Excavation	3	52	19	<1	5	3
Building Construction, Architectural Coating, and Paving	25	32	27	<1	3	2
Maximum Regional Threshold	75	100	550	150	150	55
Threshold exceeded?	No	No	No	No	No	No

Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix A.

Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

Source: 2005 W. James M Wood Blvd Hotel Project Air Quality Technical Report. ESA (February 2017)

The proposed Project would contribute to regional and localized air pollutant emissions during construction (short term) and proposed Project occupancy (long term). These construction activities would create emissions of dusts, fumes, equipment exhaust, and other air contaminants. Construction activities during demolition/site clearing and site preparation/excavation would primarily generate particulate matter less than 10 microns (PM10) and particulate matter less than 3.0 microns (PM2.5) emissions. Mobile sources (such as diesel-fueled equipment on site, and traveling to and from the Project site) would primarily generate nitrogen oxide (NOx) emissions. The application of architectural coatings would primarily result in the release of reactive organic gas (ROG) emissions. The amount of emissions generated on a daily basis would vary, depending on the amount and types of construction activities occurring at the same time. In addition, these calculations assume that appropriate dust control measures would be implemented as part of the proposed Project during each phase of development, as required by SCAQMD Rule 403—Fugitive Dust.

Operational emissions generated by both stationary and mobile sources would result from normal day-to-day activities of the Project. Area-source emissions would be generated by the consumption of natural gas and landscape maintenance. Mobile emissions would be generated by the motor vehicles traveling to and from the Project site. The analysis of daily operational emissions associated with the Project has been prepared utilizing CalEEMod, as recommended by the SCAQMD. The estimated emissions from existing uses on the site were subtracted from the estimated emissions resulting from the Project to calculate a potential net change in emissions. The results of these calculations are presented in **Table 4.3-2, Maximum Unmitigated Operational Emissions**. Note that the results reflect the net difference between the existing operational emissions generated by uses that would be removed from the Project site and

the Project's operational emissions. As shown in **Table 4.3-2**, the operational emissions generated by the Project would not exceed the regional thresholds of significance set by the SCAQMD. As such, impacts would be less than significant. Based on the above, impacts from the Project would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

Table 4.3-2
Maximum Unmitigated Operational Emissions (pounds/day)

Source	VOC	NO _x	CO	SO _x	PM10	PM 2.5
Area	<u>1</u>	<1	<1	<1	<0.1	<0.1
Energy	<1	<1	<1	<1	<0.1	<0.1
Mobile	2	7	18	<1	3.9	1.1
<i>Total</i>	3	7	18	<1	4.0	1.1
<i>Existing</i>	1	2	6	<1	1.2	0.3
Net Total	2	5	12	<1	2.8	0.8
SCAQMD Mass Daily Threshold	55	55	550	150	150	55
Threshold exceeded?	No	No	No	No	No	No

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Source: CalEEMod.

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

Less than Significant Impact. Based on the *L.A. CEQA Thresholds Guide*, a significant impact could occur if the Project would add a considerable cumulative contribution to federal or State nonattainment pollutants. Given that the Basin is currently in State nonattainment for ozone, PM10, and PM2.5,⁷ related projects could exceed an air quality standard or contribute to an existing or projected air quality exceedance. In regard to determining the significance of the Project contribution, the SCAQMD neither recommends quantified analyses of construction and/or operational emissions from multiple 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 be assessed utilizing the same significance criteria as those for project-specific impacts. Furthermore, SCAQMD states that "projects that do not exceed the project-specific

7 California Air Resources Board (CARB), "Area Designation Maps/State and National," <http://www.arb.ca.gov/desig/adm/adm.htm>.

thresholds are generally not considered to be cumulatively significant.”⁸ If an individual Project generates less than significant construction or operational emissions, then the Project would not generate a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment.

The emissions from construction of the Project are not predicted to exceed any applicable SCAQMD regional or local impact threshold and therefore, are not expected to result in ground level concentrations that exceed the National Ambient Air Quality Standards (NAAQS) or the California Ambient Air Quality Standards (CAAQS). Therefore, the project would not result in a cumulatively considerable net increase for nonattainment pollutants or ozone precursors. As such, the impact would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

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

Less than Significant Impact with Project Mitigation. Project construction activities and operations, as described previously, 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 that would be adversely impacted by changes in air quality.

The SCAQMD has developed localized significance thresholds (LSTs) based on the pounds of emissions per day that can be generated by a project that would cause or contribute to adverse localized air quality impacts.⁹ These localized thresholds apply to projects that are less than or equal to 5 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 are not expected to cause or contribute to an exceedance of the most stringent 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). For PM₁₀, the LSTs were derived based on requirements in SCAQMD Rule 403—Fugitive Dust. For PM_{2.5}, LSTs were derived based on a general ratio of PM_{2.5} to PM₁₀ for both fugitive dust and combustion emissions.

The nearest sensitive receptors that could potentially be subject to localized air quality impacts associated with construction of the Project are the multifamily residential units on the northern boundary of the Project site. The screening criteria provided in the Localized Significance Threshold Methodology were used to determine localized construction emissions thresholds for the Project.

8 South Coast Air Quality Management District (SCAQMD), *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution* (2003), Appendix A.

9 SCAQMD, *Final Localized Significance Threshold Methodology* (June 2003; rev. July 2008).

Emissions from construction activities have the potential to generate localized emissions that may expose sensitive receptors to harmful pollutant concentrations. The LST analysis for the Project has been prepared utilizing CalEEMod and threshold levels as recommended by the SCAQMD. Shown in **Table 4.3-3, Maximum Unmitigated LST Emissions**, the net difference between the emissions from current uses at the Project site and the peak daily emissions that would be generated within the Project site during construction activities for each phase. No other construction emissions would occur and, therefore, localized air quality impacts from construction activities to the off-site sensitive receptors would be less than significant.

Project construction would result in short-term emission of diesel particulate, which is a toxic air contaminant. Given the proximity of residential uses, it is possible that the Project could contribute to cumulative health impacts from toxic air contaminants. Therefore, it is conservatively considered that the Project would have a potentially significant impact and mitigation is identified below.

Project operations would generate only minor amounts of diesel emissions from residential delivery trucks and incidental maintenance activities. Trucks would comply with the applicable provisions of the CARB Truck and Bus regulation to minimize and reduce emissions from existing diesel trucks. Therefore, the Project operations would not be considered a substantial source of diesel particulates.

In addition, Project operations would only result in minimal emissions of air toxics from maintenance or other ongoing activities, such as from the use of architectural coatings and other household cleaning products. As a result, toxic or carcinogenic air pollutants are not expected to occur in any meaningful amounts in conjunction with operation of the proposed residential uses within the Project site. Based on the uses expected on the Project site, potential long-term operational impacts associated with the release of TACs would be minimal and would not be expected to exceed the SCAQMD thresholds of significance. Therefore, operational impacts would be less than significant.

Mitigation Measures: The Project Applicant shall adopt the following mitigation measure in order to reduce potential impacts to a less than significant level.

- **MM-AIR-1: Off-road diesel-fueled heavy-duty construction equipment**

Off-road diesel-fueled heavy-duty construction equipment greater than 50 horsepower (hp) used for this Project and located on the Project site for a total of five (5) days or more shall meet at a minimum the United States Environmental Protection Agency (USEPA) Tier 3 emissions standards and the equipment shall be outfitted with Best Available Control Technology (BACT) devices including a CARB certified Level 3 Diesel Particulate Filter or equivalent control device.

**Table 4.3-3
Maximum Unmitigated LST Emissions¹ (pounds/day)**

Source	NOx	CO	PM10	PM2.5
Construction				
Total unmitigated maximum emissions	29	23	3	2
LST threshold	58	503	4	2
Threshold Exceeded?	No	No	No	No
Operational				
Project Area/energy emissions	<1	<1	<0.1	<0.1
Existing Area/energy emissions	<1	<1	<0.1	<0.1
Net Area/energy emissions	<1	<1	<0.1	<0.1
LST threshold	58	503	2.0	0.5
Threshold Exceeded?	No	No	No	No

Notes: Emission calculations are provided in **Appendix A**.

Totals in table may not appear to add exactly due to rounding in the computer model calculations.

The operational emissions of the Project represent the net difference between the existing operational uses that would be removed and the Project operational emissions.

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

¹ LST for a 1.18-acre site, LST values were interpolated between the 1-acre and 2-acre values accordingly, then rounded down to the nearest whole number.

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

Less than Significant Impact. A significant impact could occur if a project were to generate objectionable odors that adversely affected 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 sewage treatment facilities and landfills. As the Project involves no elements related to these types of activities, no odors are anticipated. During the construction phase for the Project, activities associated with the operation of construction equipment, the application of asphalt, 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. Good housekeeping practices, such as the use of trash receptacles, would be sufficient to prevent nuisance odors. Adherence with SCAQMD Rule 402 (Nuisance), and SCAQMD Best Available Control Technology Guidelines would limit potential objectionable odor impacts from the proposed uses. Therefore, impacts from the Project 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 U.S. Fish and Wildlife Service?*

Less than Significant Impact with Project Mitigation. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project could have a significant impact on biological resources if it would result 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 Project site is currently developed with an existing commercial retail building and related surface parking. The Project site does not contain any critical habitat or support any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or US Fish and Wildlife Service (USFWS).

Nesting birds are protected under the federal Migratory Bird Treaty Act (MBTA)¹⁰ and the California Department of Fish and Wildlife Code¹¹, and the removal of trees could impact bird nests. There is one street adjacent to the site that may be removed during construction. As such, the potential exists for disruption of nesting habitat.

Mitigation Measures: The Project Applicant shall adopt the following mitigation measure in order to reduce potential impacts from the Project to a less than significant level.

- **MM-BIO-1: Habitat Modification (Nesting Native Birds, Non-Hillside or Urban Areas)**

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).

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

¹¹ California Department of Fish and Wildlife Code, sec. 3503.

Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture of kill (Fish and Game Code, Section 86).

If Project activities cannot feasibly avoid the breeding season, beginning 30 days prior to the disturbance of suitable nesting habitat, the Project Applicant shall:

- Arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within properties adjacent to the Project Site, as access to adjacent areas allows. The surveys shall be conducted by a qualified biologist with experience in conducting breeding bird surveys. The surveys shall continue on a weekly basis, with the last survey being conducted no more than 3 days prior to the initiation of clearance/construction work.
- If a protected native bird is found, the Project Applicant shall delay all clearance/ construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species until August 31.
- Alternatively, the qualified biologist could continue the surveys 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.
- The Project 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 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. The Project site is within a developed and heavily urbanized area within the City of Los Angeles. The Site is currently occupied by a commercial retail complex and related surface parking lot. No riparian or other sensitive natural community is found on or adjacent to the Project site. No impacts would occur.

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 *L.A. CEQA Thresholds Guide*, a project could have a significant impact on biological resources if it would result in the alteration of an existing wetland habitat. The Project site is entirely developed and covered with impermeable surfaces. The Project site does not contain any wetlands or natural drainage channels. The Project site does not have the potential to support any riparian or wetland habitat as defined by Section 404 of the Clean Water Act. 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 *L.A. CEQA Thresholds Guide*, a project could have a significant impact on biological resources if it would interfere with wildlife movement/migration corridors that may diminish the chances for long-term survival of a sensitive species. The Project site is in an area that has been previously developed in a heavily urbanized area of the Westlake community of the City of Los Angeles. Due to the highly urbanized surroundings, there are no wildlife corridors or native wildlife nursery sites in the Project vicinity. 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?***

Less than Significant Impact with Project Mitigation. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project-related, significant adverse effect could occur if the 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 Ordinance¹² or the City's adopted street tree policies. The Project site does not contain any trees, however there is a palm tree within the sidewalk right of way adjacent to the site. . This tree is not covered by the Protected Tree Ordinance. The Applicant would be required to process a tree removal permit through the Department of Public Works if this tree is to be removed. With compliance with the permit process, impacts would be less than significant.

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

Mitigation Measures: No mitigation measures are necessary.

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 could occur if the Project would be inconsistent with mapping or policies in any conservation plans of the types cited. The 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. No impacts would occur.

Mitigation Measures: No mitigation measures are necessary.

4.5 CULTURAL RESOURCES

Impact Analysis

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

Less than Significant Impact. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact could occur if the Project would disturb historic resources that presently exist within the Project site. Section 15064.5 of the CEQA Guidelines generally defines a historic resource as a resource that is (1) listed in, or determined to be eligible for listing, in the California Register of Historical Resources (California Register); (2) included in a local register of historical resources (pursuant to Section 5020.1(k) of the Public Resources Code); or (3) identified as significant in an historical resources survey (meeting the criteria in Section 5024.1(g) of the Public Resources Code). Additionally, any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register. The California Register automatically includes all properties listed in the National Register of Historic Places (National Register) and those formally determined to be eligible for listing in the National Register.

The Project site is currently developed with a commercial retail building and related surface parking. The existing structure is not designated for listing on the National Register of Historic Places, California Register of Historic Places, or the Los Angeles Historic Cultural Monument list. None of the existing structures have been identified as culturally significant through the SurveyLA, a comprehensive program by the City of Los Angeles Office of Historic Resources to identify significant historic resources. The nearest historic resource or potentially historic resource is the Charles B Booth Residence and Carriage House, located approximately 0.22 miles east of the Project site, which is designated as a Los Angeles Historic-Cultural Monument.¹³

Section 15064.5(b)(2) of the State CEQA Guidelines states that a Project would cause a substantial adverse change in the significance of a historic resource if it:

¹³ HistoricPlacesLA, *Los Angeles Historic Resources Inventory*, <http://www.historicplacesla.org/reports/f159b844-37e1-4d1b-9c01-68c1bec5bb8c>, accessed June 2017.

- a) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or
- b) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- c) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

Construction and operation of the Project would not alter any of the physical characteristics of the nearby historic resources. Additionally, construction and operation of the Project would not alter the historic context of these buildings. The Project would be compatible in mass, size, and scale with the development pattern of the surrounding portion of Downtown Los Angeles and would not adversely alter the design, character or feeling associated with these historic resources. Therefore, 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 Section 15064.5?

Less than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact could occur if grading or excavation activities associated with the Project would disturb unique archaeological resources that could exist within the Project site. The Project site is located within an urbanized area that has been subject to grading and development in the past. There are no known archaeological sites or archaeological survey areas on or adjacent to the Project site. As such, the likelihood of unearthing unique archeological resources is considered low. Per California Public Resources Code Section 21083.2(f), a lead agency may make provisions for archeological sites accidentally discovered during construction. As a condition of approval, the City of Los Angeles requires that if archeological artifacts are unearthed, construction activity cease while the significance of the artifacts are evaluated. With compliance, any potential archeological impacts of the Project 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 upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact could occur if grading or excavation activities associated with the Project were to disturb unique paleontological resources or geologic features that presently exist within the Project site. The Project site has been previously graded and is currently improved with an existing commercial retail building and related surface parking. The Project site and immediate surrounding areas do not contain any known vertebrate paleontological resources. As such, the likelihood of unearthing unique paleontological resources is considered low. As a condition of approval, the City of Los Angeles requires that if paleontological artifacts are unearthed, construction activity cease while the significance of the artifacts are evaluated. With compliance, any potential paleontological impacts of the Project 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 established in the *L.A. CEQA Thresholds Guide*, a significant adverse effect could occur if grading or excavation activities would disturb previously interred human remains. The Project site is located in an urbanized area and has been subject to grading and development in the past. No known burial sites are located on or adjacent to the Project site. Furthermore, the Project Applicant shall be required to comply with existing regulations, including State Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98 that specify the protocol if human remains are discovered during excavation, grading, or construction activities. If human remains are encountered 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. If the County Coroner concludes that the remains are of Native American descent, the Native American Heritage Commission must be notified within 24 hours, and NAHC guidelines would be adhered to in the treatment and disposition of the remains. With regulatory compliance, any potential impacts of the Project would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

4.6 GEOLOGY AND SOILS

Impact Analysis

Would the project exacerbate existing hazardous environmental conditions by bringing people or structures into areas that are susceptible to potential substantial adverse effects, including the risk of loss, injury, or death involving:

- a. *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 *L.A. CEQA Thresholds Guide*, a significant impact could occur if a project were located within a State-designated Alquist-Priolo Zone or other designated fault zone. According to the City's General Plan, the 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.¹⁴ Additionally, the Project site is not located within an Alquist-Priolo Earthquake Fault Zone, nor do any known active faults cross the Project site.¹⁵ The potential risk for surface fault rupture through the Project site is considered low. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

- b. *Strong seismic ground shaking?*

Less than Significant Impact. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact could occur if a project were to represent 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.

As previously discussed, the Project site is not located within a seismic hazard zone for liquefaction, landsliding, or faulting. The nearest potentially active fault is, the Puente Hills Blind Thrust Fault and is within 5 miles of the Project site.¹⁶ The Project would conform to all applicable provisions of the California Building Code seismic standards with respect to new construction, as approved by the Department of

14 *City of Los Angeles General Plan, "Safety Element" (1996).*

15 Department of Conservation, "Regulatory Maps: Hollywood Quadrangle, GIS Data," <http://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=regulatorymaps>.

16 City of Los Angeles Department of City Planning, Parcel Profile Reports, *Zoning Information and Map Access System (ZIMAS)*, database, <http://www.zimas.lac.ity.org>.

Building and Safety. Adherence to current building codes and engineering practices would ensure that the Project would not expose people, property, or infrastructure to seismically induced ground-shaking hazards that are greater than the average risk associated with locations in the Southern California region. As such, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

c. Seismic-related ground failure, including liquefaction?

Less than Significant Impact. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact could occur if a project site were located within a liquefaction zone. As stated in the City's General Plan, Safety Element, and as noted in the City's parcel information report, the Project site is not located within an area identified as having a potential for liquefaction. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

d. Landslides?

No Impact. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project could have a significant geologic hazard impact if it were to 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 could occur if the project were located in a hillside area with soil conditions that would suggest a high potential for sliding.

The Project site is on relatively level terrain. According to the California Division of Mine and Geology Seismic Hazard Zones Map of the Hollywood Quadrangle¹⁷ and the City of Los Angeles Safety Element,¹⁸ the Project site is not in a designated earthquake-induced landslide hazard zone. Therefore, the probability of landslides is considered to be very low. No impacts would occur.

Mitigation Measures: No mitigation measures are necessary.

17 California Department of Conservation, Division of Mines and Geology, "Seismic Hazard Zone Report for the Hollywood 7.5-Minute Quadrangle, Los Angeles County, California" (1998).

18 *City of Los Angeles General Plan, "Safety Element"* (1996).

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

Less than Significant Impact. Based on the criteria established in the *L.A. 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 sedimentation, resulting in sediment runoff or deposition that would not be contained or controlled on site.

Although development of the Project site 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 of Los Angeles 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 Project is extremely low due to the predominantly level topography of the site; furthermore, the Project site would be almost entirely built upon, with little or no soil exposed.

All grading activities would require grading permits from the Los Angeles Department of Building and Safety (LADBS), and would be required to comply with the standards designed to limit potential erosion impacts. 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 the Department of Building and Safety's Grading Division. Chapter IX, Division 70 of the LAMC addresses grading, excavations, and fills. For these reasons, Project impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

- f. 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 caused in whole or in part by the project's exacerbation of the existing environmental conditions?***

Less than Significant Impact. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project could 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 this specific issue, a significant impact could occur if the 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.

As previously discussed, the Project site is not located within a liquefaction zone and the potential for seismically induced settlement at the Project site is considered small. The design and construction of the Project would be to the satisfaction of the LADBS to ensure favorable conditions for the permanent retaining structure. Additionally, construction of the Project would comply with the City of Los Angeles Uniform Building Code (Building Code) which is designed to ensure safe construction and includes building foundation requirements appropriate to site conditions. Code requirements to prevent soil erosion and liquefaction would be implemented.

For all these reasons, Project Impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

- g. 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 caused in whole or in part by the project exacerbating the expansive soil conditions?***

Less than Significant Impact. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project could have a significant geologic hazard impact if it were to cause or accelerate geologic hazards that would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. For this specific issue, a significant impact could occur if a project were 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. Expansive soils contain significant amounts of clay particles that swell considerably when wetted and that shrink when dried. Foundations constructed on these soils are subject to uplifting forces caused by the swelling. Without proper mitigation measures, heaving and cracking of both building foundations and slabs-on-grade could result.

The Project site is currently improved with a commercial retail building and related surface parking lot. Construction of the Project would be required to comply with the City of Los Angeles Uniform Building Code, Los Angeles Municipal Code and other applicable building codes which includes building foundation requirements appropriate to site-specific conditions. Therefore, Project impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

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

No Impact. The Project site is located in a developed area that is served by the wastewater collection, conveyance, and treatment system operated by the City of Los Angeles. The Project's wastewater demand would be accommodated via connections to this existing wastewater infrastructure. No septic tanks or alternative disposal systems would be utilized. Moreover, there is no construction proposed or contemplated on the remaining properties within the Project site. For all these reasons, no impacts would occur.

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?

Less than Significant Impact. A significant impact could occur if a project were to 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. The background and regulatory context of GHG emissions is discussed in the Technical Report included as an Appendix A of this Initial Study.

As detailed therein, construction and operational GHG emissions were modeled using CalEEMod for each year of construction of the Project and for a typical year of operation. The estimated emissions from existing uses on the site were subtracted from the estimated emissions resulting from the Project to calculate a potential net change in emissions.

The California Air Pollution Control Officers Association suggests making significance determinations on a case-by-case basis when no significance thresholds have been formally adopted by a lead agency. Although GHG emissions are quantified and shown in **Table 4.7-1 Annual Greenhouse Gas Emissions**, CARB, SCAQMD, and the City of Los Angeles have yet to adopt project-level significance thresholds for GHG emissions that would be applicable to the Project. The Technical Report includes a threshold that was once used for the City of Los Angeles, which is included in **Table 4.7-1**. As shown, the net increase in GHG emissions generated by the Project would be 1,116 MTCO₂e per year.

Assessing the significance of a project's contribution to cumulative global climate change involves (1) evaluating the project's sources of GHG emissions; and (2) considering project consistency with applicable emission reduction strategies and goals, such as those set forth by the lead agency or other regional state agency. As described below, the Project would be consistent with the City of Los Angeles goals and actions to reduce the generation and emission of GHGs from both public and private activities pursuant to the applicable portions of the Westlake Community Plan, LA Green Plan and Sustainable City pLAN. As such, impacts would be less than significant.

**Table 4.7-1
Annual Greenhouse Gas Emissions**

GHG Emissions Source	Emissions (MTCO ₂ e/year)
Project Construction	449
Construction (amortized)	15
Operational (mobile) sources*	850
Area sources	<1
Energy (Gas and Electricity)	568
Waste	7
Water	21
Annual Total	1,461
Existing	345
Net Total	1,116
Significance Threshold	3,000
Threshold Exceeded?	No

Source: CalEEMod.

Notes: Emissions calculations are provided in **Appendix A**

Totals in table may not appear to add exactly due to rounding in the computer model calculations.

The emissions of the Project represent the net difference between the existing greenhouse-generated uses that would be removed and the Project greenhouse gas emissions.

MTCO₂e = metric tons of carbon dioxide emissions.

* N₂O emissions account for 0.04 MTCO₂e/year.

Mitigation Measures: No mitigation measures are necessary.

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. On September 8, 2016, Governor Brown enacted SB 32 that extends AB 32 another ten years to 2030 and increase the State's objectives. SB 32 calls on Statewide reductions in GHG emissions to 40 percent below 1990 levels by 2030. In addition, AB 197 requires ARB to approve a statewide GHG emissions limit equivalent to the statewide GHG emission level in 1990 to be achieved by 2030. SB 32 requires ARB to prepare and approve a scoping plan for achieving the maximum technologically feasible and cost-effective reductions in GHG emissions.

Executive Orders S-3-05 and B-30-15, SB 375, and SCAG's Sustainable Communities Strategy all apply to the Project and are all intended to reduce GHG emissions to meet the statewide targets set forth in AB 32.

Sustainable Communities and Climate Protection Act (SB 375)

SB 375, signed into law in September 2008, aligns regional transportation planning efforts, regional GHG reduction targets, and land use and housing allocations. This act requires metropolitan planning organizations (MPOs) to adopt a Sustainable Communities Strategy (SCS) or Alternative Planning Strategy (APS) that prescribes land use allocation in that MPO's regional transportation plan (RTP). CARB, in consultation with MPOs, provided regional reduction targets for GHGs for the years 2020 and 2035. As mentioned above, the Project would be within the employment and population forecasts.

Green Building Standards (CALGreen) Code

In November 2008, the California Building Standards Commission established the California Green Building Standard Code (CALGreen Code), which sets performance standards for residential and nonresidential development to reduce environmental impacts and encourage sustainable construction practices. As of January 1, 2011, the CALGreen Code is mandatory for all new building construction in the State. The CALGreen Code addresses energy efficiency, water conservation, material conservation, planning and design, and overall environmental quality.

In December 2010, the Los Angeles City Council adopted various provisions of the CALGreen Code as part of Ordinance No. 181,480, thus codifying certain provisions of the CALGreen Code as the new Los Angeles Green Building Code (LA Green Building Code). The LA Green Building Code imposes more stringent green building requirements than those contained within the CALGreen Code, and is applicable to the construction of every new building, every new building alteration with a permit valuation of over \$200,000, and every building addition unless otherwise noted. Specific mandatory requirements and elective measures are provided for three categories: (1) low-rise residential buildings; (2) nonresidential and high-rise residential buildings; and (3) additions and alterations to nonresidential and high-rise residential buildings. In 2016, the Los Angeles City Council adopted the 2017 Los Angeles Green Building Code, which is in effect as of January 1, 2017. The 2017 Los Angeles Green Building Code contains mandatory measures for residential and nonresidential development related to site development; water use; weather resistance and moisture development; construction waste reduction; disposal and recycling; building maintenance and operation; pollutant control; indoor air quality; environmental comfort; outdoor air quality; and electric vehicle charging requirements. The GHG emissions resulting from operation of the proposed Project would comply with the LA Green Building Code and not conflict with any policies set forth by the CALGreen Code.

Consistency with SCAG 2016-2040 RTP/SCS

Senate Bill (SB) 375, authored by Senate President Pro Tem Darrell Steinberg, was signed into law on September 30, 2008. SB 375 is the most ambitious attempt yet to coordinate planning for land use and transportation at a regional scale, with the goal of reducing the amount that people have to drive and associated greenhouse gases.¹⁹ As mentioned previously, projects that are consistent with the population forecasts identified in the Growth Management chapter forms the basis of the land use and transportation control portions of the AQMP. According to the SCAG estimates, the 2015 population within Los Angeles County is 10,158,776 residents. The population projections used to estimate emissions in the 2016 AQMP for the year 2040 anticipated a population of 11,513,435 by the year 2040. The project would not generate any residences. As such, the project would be consistent with the planned land uses and employment growth for Los Angeles and would not conflict with the AQMP.

City of Los Angeles Sustainable City pLAN

On April 8, 2015, the City of Los Angeles released the Sustainable City pLAN (“pLAN”) which defines a roadmap for actions to be taken by the City over the next 20 years to create a City that is environmentally healthy, economically prosperous, and equitable in opportunity. The pLAN addresses increasing local water and solar energy resources, energy efficiency in new buildings, carbon and climate leadership and waste and landfills. The pLAN also addresses the housing shortage in the City by calling for 100,000 new housing units by 2021, leading to 150,000 new housing units by 2035, with policies to encourage that 57 percent of these units be built near transit in 2025 and 65 percent by 2025 to help the City meet its GHG reduction goals. In 2014, 43 percent of new housing units in the City were built near transit.

On carbon and climate leadership, the pLAN states that the City will reduce GHG emissions below the 1990 levels called for by state law by 2020. The City’s objectives are to reduce GHG emissions below 1990 baseline by at least 45 percent by 2025, 60 percent by 2035 and 80 percent by 2050. By 2017, the City will develop a comprehensive climate action and adaptation plan. Strategies and policy initiative include creating a benchmarking policy for building energy use, and incentivizing or requiring Leadership in Energy and Environmental Design (LEED) Silver or better for new construction.

The Project would be consistent with the planned land use for the Van Nuys-North Sherman Community Plan area and would not conflict with the AQMP. As described previously, through required implementation of the LA Green Building Code, the Project would be consistent with local and Statewide goals and policies aimed at reducing the generation of GHGs. The Project’s generation of GHG emissions would not make a cumulatively considerable contribution to or conflict with an applicable plan, policy, or

¹⁹ Climate Plan, SB 375 Fact Sheet, <http://www.climateplan.org/wp-content/uploads/2011/05/TransForm-SB-375-4-page-Statewide-Oct-2011.pdf>

regulation for the purposes of reducing the emissions of greenhouse gases. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

4.8 HAZARDS AND HAZARDOUS MATERIALS

The following section incorporates by reference, information from the *Phase 2 Environmental Site Assessment*, dated December 22, 2015 and prepared by Western Environmental Engineers Company on behalf of the Applicant is shown in **Appendix B**.

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 *L.A. 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 types and amounts of hazardous materials that would be used in connection with the Project would include typical household products used by the hotel staff (e.g., cleaning solutions, solvents, pesticides for landscaping, painting supplies, and petroleum products). The routine use and disposal of normal household products is not considered to create a significant hazard to the public or the environment.

Construction of the Project would also involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, transmission fluids, solvents, and other acidic and alkaline solutions that would require special handling, transport, and disposal. However, all potentially hazardous materials would be used and stored in accordance with applicable federal, State, and Local regulations. As such, the Project would not create a significant hazard to the public or the environment. 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. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project could have a significant impact to hazards and hazardous materials if (a) A project involved a risk of accidental explosion or release of hazardous substances (including, but not limited to oil, pesticides, chemicals or radiation); or (b) A project involved the creation of any health hazard or potential health hazard. A common list of potentially hazardous materials that may be found at the Project site could consist of, but are not limited to, the following:

Household Products

By far the most common hazardous materials are those found or used in the home for such activities as cleaning, painting, and pest control. However, it is expected that household products would be used and stored in accordance with applicable federal, State, and local regulations.

Asbestos-Containing Materials

Asbestos is a crumbly material often found in older buildings, typically used as insulation in walls or ceilings. It was formerly popular as an insulating material because it had the desirable characteristic of being fire resistant and asbestos-containing materials were taken off the market in 1984. 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. The Department of Toxic Substance Control (DTSC) classifies asbestos waste as potentially hazardous if it is greater than 1 percent and easily crumbled (friable). The existing structure was built in 1989, therefore the potential that asbestos-containing material was used in the building is low.

Polychlorinated Biphenyls

Polychlorinated Biphenyls (PCBs) are man-made organic chemicals that were formerly manufactured for use in various industrial and commercial applications as a result of their nonflammability, chemical stability, high boiling point, and electrical insulating properties. While the manufacture of PCBs was banned in 1979, these hazardous materials may be found in products associated with transformers, electrical equipment, motor oil, hydraulic systems, cable and thermal insulation, adhesives and tapes, oil-based paint, caulking, plastics, and floor finish.²⁰ During the site visit performed for the Phase 2 assessment, no PCB-containing equipment was identified.

Methane and Radon Gas

According to the City's parcel records, the Project site is not located within a Methane Buffer Zone.²¹ According to the Radon Potential Zone Map for Southern Los Angeles County, California,²² the Project site is not located within a radon zone. No further investigations related to these hazards would be required.

20 US Environmental Protection Agency (USEPA), "Polychlorinated Biphenyls," <http://www.epa.gov/wastes/hazard/tsd/pcbs/about.htm> (accessed June 2017).

21 City of Los Angeles Department of Planning, *Zone Information and Map Access System (ZIMAS)*, <http://zimas.lacity.org/>, accessed June 2017.

22 California Geologic Survey, "Radon Potential Zone Map for Southern Los Angeles County, California," map, prepared by Ron Churchill (January 2005), http://www.conservation.ca.gov/cgs/minerals/hazardous_minerals/radon/Documents/sr182map.pdf.

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. Based upon the criteria established in the *L.A. 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. According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering the following factors: (a) the regulatory framework for the health hazard; (b) the probable frequency and severity of consequences to people or property as a result of a potential accidental release or explosion of a hazardous substance; (c) the degree to which project design will reduce the frequency or severity of a potential accidental release or explosion of a hazardous substance; (d) the probable frequency and severity of consequences to people from exposure to the health hazard; and (e) the degree to which project design would reduce the frequency of exposure or severity of consequences to exposure to the health hazard.

The closest schools to the Project site are the Hoover Street Elementary School, located 0.1 miles west at 2726 Francis Avenue, and Berendo Middle School, located 0.7 miles southwest at 1157 South Berendo Street. No hazardous materials other than modest amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes would be present at the Project site; moreover, use of these substances would comply with State health codes and regulations. Therefore, the Project would not create a significant hazard through hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

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 exacerbate the current environmental conditions so as to create a significant hazard to the public or the environment?

Less than Significant Impact. The Project site is currently developed with a retail building and related surface parking. There are 23 leaking underground storage tanks (LUSTs) within one-half mile of the Project site, all of which have been remediated or are currently under remediation with the State Water Resources Control Board (SWRCB). Based on the distance to the Project site and the status of the cases,

these properties are not considered to pose a significant hazard to the Project site. Impacts would be less than significant.²³

Mitigation Measures: No mitigation measures are necessary.

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 exacerbate current environmental conditions so as to result in a safety hazard for people residing or working in the project area?

No Impact. A significant impact may occur if a project were located within a public airport land use plan area or within 2 miles of a public airport and subject to a safety hazard. The closest public airports to the Project site are the Bob Hope Airport, Santa Monica Airport, and Los Angeles International Airport, all within 10 miles of the Project site to the north, west, and southwest, respectively. None of these airports are located within 2 miles of the Project site. 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 exacerbate current environmental conditions so as to result in a safety hazard for people residing or working in the project area?

No Impact. The Project is neither within the vicinity of a private airstrip nor within an area that would expose hotel guests and workers to a safety hazard. No impacts would occur.

Mitigation Measures: No mitigation measures are necessary.

g. 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 *L.A. CEQA Thresholds Guide*, a project could 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 *L.A. 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.

23 Western Environmental Engineers Company, *Phase 2/1 Environmental Site Assessment* (December 22, 2015).

The Project site is located at 2005 James M Wood Boulevard and South Westlake Avenue is to the east; neither is a selected disaster route as identified by the City's General Plan.²⁴ However, the Project site is located approximately 190 feet to the east of South Alvarado Street, which is a selected disaster route. While it is expected that the majority of construction activities for the Project would be confined to the Project site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which may result in temporary lane closures that 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 of Los Angeles Departments of Transportation, Building and Safety, and Public Works. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

h. Exacerbate existing hazardous environmental conditions by bringing people or structures into areas that are susceptible 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 Project site is in a highly urbanized area of Los Angeles and does not include wildlands or high fire hazard terrain or vegetation. Additionally, the Project site is not in a Very High Fire Hazard Severity Zone.²⁵ No impacts would occur.

Mitigation Measures: No mitigation measures are necessary.

24 City of Los Angeles General Plan "Safety Element" (1996), Exhibit H, Critical Facilities and Lifeline Systems in the City of Los Angeles.

25 City of Los Angeles Department of City Planning, ZIMAS, "Parcel Profile Reports," <http://www.zimas.lacity.org>, accessed June 2017.

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 *L.A. CEQA Thresholds Guide*, a project could 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 that 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 this specific issue, a significant impact may occur if the Project would discharge water that does not meet the quality standards of local agencies that regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts would also occur if the 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 the Standard Urban Storm Water Mitigation Plan (SUSMP) requirements to reduce potential water quality impacts.

Construction Impacts

The three general sources of potential short-term, construction-related stormwater pollution associated with the Project are (1) the handling, storage, and disposal of construction materials containing pollutants; (2) the maintenance and operation of construction equipment; and (3) earthmoving activities, which, when not controlled, may generate soil erosion via storm runoff or mechanical equipment. Under the NPDES, the Project Applicant is responsible for preparing a Storm Water Pollution Prevention Plan (SWPPP) to mitigate the effects of erosion and the inherent potential for sedimentation and other pollutants entering the stormwater system.

Surface water runoff from the Project site would continue to be collected on the Project site and directed toward existing storm drains in the Project vicinity that have adequate capacity. Pursuant to local practice and City policy, stormwater retention will be required as part of the Low Impact Development (LID) and 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.

Additionally, any pollutants from the parking areas on the Project site would be subject to the requirements and regulations of the NPDES and applicable LID Ordinance. The Project would be required to demonstrate compliance with LID Ordinance standards and retain or treat the first three-quarters of an inch of rainfall in a 24-hour period, which would reduce the Project's impact to the stormwater infrastructure. The 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 regulatory compliance, any potential water quality impacts from the Project during construction would be less than significant.

Operation Impacts

The Project would be required to demonstrate compliance with LID Ordinance standards and retain or treat the first three-quarters of an inch of rainfall in a 24-hour period. Compliance with the LID Ordinance would reduce the amount of surface water runoff leaving the Project site as compared to the current conditions. City of Los Angeles Ordinance Nos. 172,176 and 173,494 specify Storm Water and Urban Runoff Pollution Control, which requires the application of BMPs. The 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 LID Ordinance and implementation of design-related BMPs would ensure that the operation of the Project would not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality. Impacts would be less than significant.

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)?

Less than Significant Impact. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project could 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.

The Project is not adjacent to a well field nor part of a substantial groundwater recharge area. Most of the surface water runoff from the Project site is directed to adjacent storm drains though some percolation occurs around the existing residential properties. Given the relatively small pervious site area and the location, the development of the existing residential lots to impervious surfaces would not substantially interfere with groundwater supplies. Impacts on groundwater would be less than significant.

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 *L.A. CEQA Thresholds Guide*, a project could 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 Project site is in a highly urbanized area of Los Angeles, and no streams or river courses are located on or within the Project vicinity. The Project site is fully developed with impervious surface. Implementation of the Project would not increase site runoff or result in changes to the local drainage patterns. Implementation of a SWPPP for the Project would reduce the amount of surface water runoff after storm events because the Project would be required to implement stormwater BMPs to retain or treat the runoff from a storm event producing three-quarters of an inch of rainfall in a 24-hour period. 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?***

Less than Significant Impact. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project could 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 Project site is fully developed and has a completely impervious surface. Implementation of the Project would not result in a significant increase in site runoff or cause any changes in the local drainage patterns that would result in flooding on or off site. Impacts would be less than significant.

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 *L.A. CEQA Thresholds Guide*, a project could 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 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 the Project site were to increase to a level that exceeds the capacity of the storm drain system serving the Project site. A Project-related significant adverse effect would also occur if the Project would substantially increase the probability that polluted runoff would reach the storm drain system.

The Project would not result in a significant increase in site runoff, or any changes in the local drainage patterns. Runoff from the Project site currently is, and would continue to be, collected on the site and directed toward existing storm drains in the 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 parking areas would be subject to the requirements and regulations of the NPDES and applicable LID Ordinance requirements. Accordingly, the Project would be required to demonstrate compliance with LID Ordinance standards and retain or treat the first three-quarters of an inch of rainfall in a 24-hour period. The 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. 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 could occur if the Project includes potential sources of water pollutants that would have the potential to substantially degrade water quality. Construction of the Project, such as grading and excavation activities, could potentially degrade water quality through erosion and subsequent sedimentation. However, the implementation of BMPs and compliance with all federal, State, and Local regulations governing stormwater discharge would reduce the impacts of the Project on surrounding water quality. 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 could occur if the Project were to place housing within a 100-year flood hazard area. A 100-year flood is defined as a flood that results from a severe rainstorm with a probability of occurring approximately once every 100 years. According to the Safety Element of the City's General Plan, the Project site is not within a designated flood zone.²⁶ Therefore, 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 could occur if a Project were located within a 100-year flood zone and would impede or redirect flood flows. The Project site is not in an area designated as a 100-year flood hazard area. The Project site is in a highly-urbanized area, and no changes to the local drainage pattern would occur with implementation of the Project. Therefore, the Project would not have the potential to impede or redirect floodwater flows. No impact would occur.

Mitigation Measures: No mitigation measures are necessary.

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?

No Impact. A significant impact could occur if the Project were to expose people or structures to a significant risk of loss or death caused by the failure of a levee or dam. According to the Safety Element of the City General Plan, the Project site is not within a potential inundation area. As such, the Project would not 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. No impacts would occur.

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 the Project site were sufficiently close to the ocean or other water body to potentially be at risk of the effects of seismically induced tidal phenomena (e.g., seiche and tsunami), or if the Project site were located adjacent to a hillside area with soil characteristics that would

²⁶ *City of Los Angeles General Plan, "Safety Element" (1996), Exhibit F, 100-Year & 500-Year Flood Plains in the City of Los Angeles, (1996).*

indicate potential susceptibility to mudslides or mudflows. The Project site more than 11 miles from the ocean, and is not in a potential seiche or tsunami zone. With respect to the potential impact from a mudflow, the Project site is relatively flat and is surrounded by urban development. Therefore, there are no sources of mudflow within the vicinity of the Project site. No impacts would occur.

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 could occur if a project were to be sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community. According to *the L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering the following factors: (a) the extent of the area that would be impacted, the nature and degree of impacts, and the types of land uses within that area; (b) the extent to which existing neighborhoods, communities, or land uses would be disrupted, divided or isolated, and the duration of the disruptions; and (c) the number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the proposed Project.

The Project site is in the Westlake Community Plan Area of the City of Los Angeles. The neighborhood is urbanized and contains uses similar to the proposed use of the Project site. No alteration of street pattern is proposed and no separation of uses or disruption of access between land use types would occur as a result of the Project. Therefore, the Project would not significantly disrupt or divide the physical arrangement of the established community. 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 could occur if a project were to be 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 Project site is within the jurisdiction of the City of Los Angeles, and is therefore subject to the designations and regulations of several local and regional land use plans and the municipal zoning code.

SCAG Regional Comprehensive Plan. The Project site is within the six-county region that makes up 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 Project would be consistent with policies set forth in the RCP because it would replace a developed site within an existing urban setting. 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 Project would further these strategies by redeveloping an underutilized commercial property with a denser hotel project that is within walking distance of public transit and located within a Transit Oriented District. Impacts would be less than significant.

City of Los Angeles General Plan. The land use component of the City of Los Angeles General Plan is set forth in the General Plan Framework (GPF) and in Community Plans. The GPF sets forth a citywide comprehensive long-range growth strategy and defines Citywide policies regarding land use, housing, urban form, neighborhood design, open space and conservation, economic development, transportation, infrastructure, and public services. GPF land use policies are further guided at the community level through community plans and specific plans. The GPF 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 Project site is along the edge of an area designated as a Regional Center as shown in Figure 3-1 of the GPF, which defines Regional Center as a "focal point of regional commerce, identity and activity and containing a diversity of uses." The GPF states that Regional Centers will have a range of FARs from 1.5:1 to 6.0:1 and are characterized by 6- to 20-story buildings.²⁷ As such, the Project is consistent with the General Plan Framework.

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

The Project site is zoned C2 and R4. C2 permits a range of retail and commercial uses as well as the multiple dwelling zone uses permitted in the R4 zone. As such, the proposed uses would conform to existing zoning.

The Project site is also currently zoned as Height District 1, which permits a maximum FAR for commercial uses of 1.5:1 and for residential uses of 3.0:0. The Project would have an FAR of approximately 2.99:1. As such, it would exceed the permitted density of Height District 1. The applicant is requesting a Vesting Zone Change pursuant to LAMC 12.23F and 12.32Q, from R4-1 and C2-1 to a C2-2 zone.

Pursuant to LAMC Section 12.22.A.25, the Project would therefore be eligible for an increase in FAR of up to 35 percent, allowing for the proposed 2.99:1 FAR ratio. Pursuant to LAMC Section 12.24 the Applicant has also requested a Conditional Use Permit to further exceed the FAR limit on the site. The City may

27 *City of Los Angeles General Plan, "Framework Element"* (2003), Fig. 3-1, Long Range Land Use Diagram.

approve this request after it has determined that the Project would support the overall planning and housing policies of the City, would enhance the neighborhood, and would not adversely affect or degrade adjacent properties. 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 project-related significant adverse effect could occur if a project site were located within an area governed by a habitat conservation plan or natural community conservation plan.

No conservation plans presently exist which govern any portion of the Project site. Further, the Project site is within a heavily urbanized area of Los Angeles. Therefore, the Project would not conflict with the provisions of an adopted habitat conservation plan or natural community conservation plan. No impacts would occur.

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 could occur if a project site were located in an area used or available for extraction of a regionally important mineral resource, or if a project were to convert an existing or future regionally important mineral extraction use to another use, or if a project were to affect access to a site used or potentially available for regionally important mineral resource extraction. According to the *L.A. 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 Project site is not within a designated MRZ-2 Area, an Oil Drilling/Surface Mining Supplemental Use District, or an Oil Field/Drilling Area.²⁸ No mineral resources are known to exist beneath the Project site. Therefore, 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, the Project site is not located within a MRZ-2 Area. The Project site is not designated as a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. Therefore, no impacts would occur.

Mitigation Measures: No mitigation measures are necessary.

²⁸ *City of Los Angeles General Plan, "Safety Element" (1990).*

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?*

Less than Significant with Project Mitigation. A significant impact could occur if a project would generate excessive noise that would cause the ambient noise environment to exceed noise level standards set forth in the City of Los Angeles Noise Ordinance (Noise Ordinance) or the City of Los Angeles CEQA Thresholds Guide. The City's Noise Ordinance (Section 112.05 of the LAMC) prohibits construction equipment noise that produces a maximum noise level exceeding 75 dB(A) at a distance of 50 feet. However, the Noise ordinance also states that this limitation does not apply where compliance is technically infeasible. According to the City of Los Angeles CEQA Threshold Guide, a significant 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 or construction activities lasting more than 10 days in a three-month period would increase ambient noise levels by 5 dB(A) or more at a noise-sensitive location. The Threshold Guide defines sensitive uses as "residences, transient lodgings, schools, libraries, churches, hospitals, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds, and parks."²⁹

To identify the existing ambient noise levels at nearby off-site sensitive receptors as well as the general vicinity of the Project site, noise measurements were taken using monitoring equipment that conforms to industry standards and the requirement specified in Section 111.01(l) of the LAMC shown in **Appendix C**. The measured noise levels are shown in **Table 4.12-1, Existing Ambient Daytime Noise Levels in the Project Site Vicinity**.

Construction of the Project would require the use of heavy equipment for demolition, site clearing, grading, excavation and foundation preparation, the installation of utilities, paving, and building construction. 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 of each activity.

The US Environmental Protection Agency (USEPA) has compiled data regarding the noise-generating characteristics of specific types of construction equipment and typical construction activities.³⁰ Based on this data, **Table 4.12-2, Typical Outdoor Construction Noise Levels** presents composite noise levels pertaining to the type and number of construction equipment that would occur at the Project site.

²⁹ City of Los Angeles, L.A. CEQA Thresholds Guide (2006), p. I.1-3.

³⁰ USEPA, *Noise from Construction Equipment and Operations, Building Equipment and Home Appliances*, PB 206717 (1971).

**Table 4.12-1
Existing Ambient Daytime Noise Levels in the Project Vicinity**

Site	Location	Leq (15-minute)
Site R1	Southern boundary of Project site on James M Wood Blvd.	67.2
Site R2	Eastern boundary of Project site along S Westlake Ave.	63.2
Site R3	Western Boundary of Project site in the alley.	61.0

Measurements were taken on Thursday, February 15, 2017 from 10:40 AM through 11:28 AM.

**Table 4.12-2
Typical Outdoor Construction Noise Levels**

Construction Phase	Approximate Leq dB(A) with Mufflers			
	25 Feet	50 Feet	100 Feet	200 Feet
Demolition	92	86	80	74
Site Preparation	88	82	76	70
Grading	93	87	81	75
Building Construction	94	88	82	76
Architectural Coating	88	82	76	70

Source: U.S. Department of Transportation, Construction Noise Handbook, Chapter 9.0 (August 2006).

The nearest sensitive receptors are the residential units along South Westlake Avenue to the north of the Project site. Given the measured ambient noise levels along the Project site boundaries, construction noise would exceed ambient exterior noise levels at the nearest identified off-site sensitive receptors by more than 5 dB(A) during construction. As such, a substantial temporary increase in ambient noise levels would occur at the identified off-site sensitive receptors. Impacts would be potentially significant. As such, mitigation identified below shall be incorporated into the Project to reduce noise levels.

Mitigation Measures: The incorporation of the following mitigation measure into the Project would reduce construction noise impacts to a less than significant level.

MM-NOI-1 Increased Noise Levels (Demolition, Grading, and Construction Activities)

- Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.

- Construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment, must be turned off when not in use for more than 30 minutes.
- Place noise-generating construction equipment and locate construction staging areas away from sensitive uses, where feasible.
- Stationary construction equipment, such as pumps, generators, or compressors, must be placed as far from noise sensitive uses as feasible during all phases of project construction.
- Implement noise attenuation measures to the extent feasible, which may include, but are not limited to, temporary noise barriers or noise blankets around stationary construction noise sources.
- The power contractor shall use either plug-in electric or solar powered on-site generators to the extent feasible

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

Less than Significant with Project Mitigation. 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. 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 ground-borne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the ground-borne 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 activities have the potential to generate low levels of ground-borne 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.

In terms of construction-related impacts on buildings, the City of Los Angeles has not adopted policies or guidelines relative to ground-borne vibration. While the Los Angeles County Code (LACC Section 12.08.350) provides a presumed perception threshold of 0.01 inch per second RMS, this threshold applies to ground-borne vibrations from long-term operational activities, not construction. Consequently, as both the City of Los Angeles and the County of Los Angeles do not have a significant 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 ground-borne vibration would be considered significant if the following were to occur:³¹

- Project construction activities would cause a PPV ground-borne 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 ground-borne vibration level to exceed 0.3 ips at any engineered concrete and masonry buildings.
- Project construction activities would cause a PPV ground-borne vibration level to exceed 0.2 ips at any nonengineered timber and masonry buildings.
- Project construction activities would cause a PPV ground-borne vibration level to exceed 0.12 ips at any historical building or building that is extremely susceptible to vibration damage.

Table 4.12-2, 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 Project site during construction.

Residences to the south are located within 25 feet of the Project site, thus vibration levels could reach 0.086 ips at these residences. 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. Therefore, vibration levels at the nearby buildings would not exceed the building damage threshold from vibration. As maximum off-site vibration levels would not exceed 0.12 PPV, there would be no potential for Project construction to result in vibration levels exceeding the most restrictive threshold of significance. Impacts with respect to building damage resulting from Project-generated vibration would be less than significant.

31 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).

**Table 4.12-3
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 drill	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Loaded truck	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.*

The FTA guidance manual also provides vibration criteria for human annoyance based on the frequency of vibration events and sensitivity of land uses. For residential buildings subject to infrequent vibration events (construction) the criterion is 80 VdB. The multifamily residential use located adjacent to the Project site could be exposed to increased vibration levels during construction. The activity of loaded trucks at the northern property edge could expose the adjacent property to vibration that would slightly exceed the threshold. As such, impacts from the Project could be potentially significant unless mitigated. Mitigation Measure **MM NOI-1** would reduce impacts from construction-related vibration, to less than significant.

Mitigation Measures: Mitigation Measure **MM NOI-1**, described above, would serve to reduce construction-related vibration impacts of the Project to a less than significant level. Specifically, restriction of the construction schedule, limitation on operating several pieces of equipment simultaneously, and placement of noise-generating equipment and staging areas away from sensitive uses would increase the distance from the noise-source and reduce the frequency of vibration events.

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 the Project were to result in a substantial permanent increase in ambient noise levels above existing ambient noise levels without the Project. The primary long-term noise source associated with the Project would be Project-related traffic. According to the *L.A. 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 evaluated in **Section 4.16, Transportation and Traffic**, the Project would not result in a doubling of the existing traffic volumes. Therefore, traffic-generated noise impacts would be less than significant.

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?

Less than Significant with Project Mitigation. The Project does not involve uses that are sources of substantial increases in periodic noise. Noise from traffic and the commercial activities associated with the Project currently exist in the Project vicinity. As discussed above, substantial temporary increases in ambient noise levels are likely during construction, however Mitigation Measure **MM NOI-1**, would ensure impacts from construction-related noise would remain less than significant.

Mitigation Measures: Mitigation measure **MM NOI-1**, identified above, would reduce potential construction noise impacts to a less than significant level.

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 were to be 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 2-mile radius of the Project site. The Project would not expose people to excessive noise levels associated with airport uses. 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. The Project site is not near a private airstrip. No impact would occur.

Mitigation Measures: No mitigation measures are necessary.

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)?*

Less than Significant 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. At the time of the 2010 Census, the Westlake Community Plan area contained 111,010 residents; the City estimated a 2014 population of 111,010 residents.³² Implementation of the Project would accommodate hotel guests and would not add permanent residents to the area. According to an Employment Density Study conducted by SCAG, for a hotel with 60,637 gross square feet, there would be the addition of approximately 40 employees to the Project site.³³ ³⁴ The City of Los Angeles had a total of 1,696,400 employees in 2012, and estimates a total of 2,169,100 employees by the year 2040, the addition of 40 employees would be approximately 0.002 percent of the projected employment population in the City of Los Angeles for the year 2040.³⁵ However, it should be noted that these employees are likely to come from the existing area, and would therefore not significantly increase the population. As such, the Project would not cause substantial growth. In addition, the Project would not occur in an undeveloped area nor would it introduce unplanned infrastructure. Impacts would be less than significant.

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. The Project would involve the demolition of a commercial retail building and related surface parking lot. The proposed Project would not result in the displacement of any existing housing units, and would therefore not necessitate the construction of replacement housing. No impacts would occur.

Mitigation Measures: No mitigation measures are necessary.

32 Los Angeles Department of City Planning, *American Community Survey (ACS)2010-2014*. (July 21, 2016).

33 The Natelson Company, *Employment Density Study*, 4.

34 The Natelson Company, *Employment Density Study* 4.

35 Southern California Association of Governments, *Final 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy* (April 2016), Demographics and Growth Forecast.

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

No Impact. As noted above, the Project would involve the demolition of a commercial retail building and related surface parking. The proposed Project would not result in the displacement of any existing housing units, or people, and would therefore not necessitate the construction of replacement housing. No impacts would occur.

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

Less than Significant. Based on the *L.A. 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. Pursuant to LAMC Section 57.09.07A, the maximum response distance between land uses and a LAFD fire station that houses an engine or truck company is 1.5 miles; for a commercial land use, the distance is 1 mile for an engine company and 1.5 miles for a truck company. If either of these distances is exceeded, all structures located in the applicable residential or commercial area would be required to install automatic fire sprinkler systems.

As noted above, the approximate percent increase of 40 employees to the Project site. However most of these employees would already live nearby, therefore not contributing to the overall population growth. Nonetheless, the Project could potentially increase the demand for LAFD services. The Project site is served by LAFD Station No. 11, located at 1819 7th Street, approximately 0.4 miles northeast of the Project site; LAFD Station No. 13, located at 2401 West Pico Boulevard approximately 0.8 miles southwest and LAFD Station 10 at 1335 South Olive Street, approximately 1.4 miles southeast of the Project site. Based on the response distance criteria specified in LAMC Section 57.09.07A and the relatively short distance from the stations to the Project site, fire protection response would be considered adequate. As such, a new fire station would not be needed to serve the project. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

ii. Police Protection

Less than Significant Impact. 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 *L.A. CEQA Thresholds Guide*, the determination of whether a 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 the project is completed 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 Project site is within Patrol Area 2 of the LAPD's Rampart Division. The Rampart Community Police Station is located at 1401 West 6th Street, less than a 1-mile driving distance to the northwest of the Project site.

Implementation of the Project would result in an increase in visitors and employees at the Project site, thereby generating a potential increase in the number of service calls from the Project site. As noted above, there would a net increase in approximately 40 employees to the Project site. However most of these employees would already live nearby, therefore not contributing to the overall population growth. Nonetheless, responses to thefts, vehicle burglaries, vehicle damage, traffic-related incidents, and crimes against persons would be anticipated to rise as a result of the increased on-site activity and increased traffic on adjacent streets and arterials. However, as a result of security lighting and other public safety features, 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. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

iii. Schools

Less Than Significant Impact. A significant impact may occur if a project were to include 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).

The Project area is currently served by the following LAUSD public schools: MacArthur Park Elementary, located at 2300 West 7th Street, which serves kindergarten through 5th grade students; John H Liechty Middle School, located at 650 South Union Avenue, which serves 6th through 8th grade students; and Belmont Senior High School, located at 1575 West 2nd Street, which serves 9th through 12th grade students. The hotel would introduce a net increase of 40 commuter employees to the area. Therefore, the Project is not expected to generate demand for LAUSD school services. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

iv. Parks

Less than Significant Impact. Based on the *L.A. CEQA Thresholds Guide*, a significant impact could occur if the Project resulted in the construction of new recreation and park facilities that creates significant direct or indirect impacts to the environment. The Project site is within a highly urbanized area of the Westlake South neighborhood and has access to numerous parks and public recreation facilities within a 2-mile radius. The proposed Project would result in an increase of visitors and employees. Visitors would be temporary users of the parks, and as noted above, there would a net increase in approximately 40 employees to the Project site. However, most of these employees would already live nearby, therefore not contributing to the overall population growth. Consequently, the Project would not result in a change in the population of the local community and as such would not result in the construction of new facilities. Impacts of the Project would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

v. Other Public Facilities

Less than Significant Impact. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on libraries shall be made considering the following factors: (a) the net population increase resulting from the Project; (b) the demand for library services anticipated at the time of project build-out compared to the expected level of service available, considering, as applicable, scheduled improvements to existing library services (renovation, expansion, addition or relocation) and the project's proportional contribution to the demand; and (c) whether the project includes features that would reduce the demand for library services (e.g., on-site library facilities or direct financial support to the Los Angeles Public Library [LAPL]).

Within the City of Los Angeles, the LAPL provides library services at the Central Library, 7 regional branch libraries, 56 community branches, and 2 bookmobile units consisting of a total of 5 individual bookmobiles. Approximately 6.5 million books and other materials form the LAPL collection. The closest branch to the Project site is the Pico Union Branch Library, located at 1030 South Alvarado Street, approximately 0.2 miles south of the Project site, although other branch locations are nearby. The proposed Project would result in an increase of visitors and employees. Visitors would be temporary users of the libraries. Moreover, as noted above, there would a net increase in approximately 40 employees to the Project site. However, most of these employees would already live nearby and, therefore, would not contribute to the overall population growth. Consequently, the projected resident population for the Project represents a relatively small change in the population of the local community. Given the multiple branches serving the area, as well as the other library facilities, new or physically altered library facilities would not be needed to serve the Project. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

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?*

Less than Significant Impact. A significant impact could occur if a project were to include substantial employment or population growth, which would increase the use of existing neighborhood and regional parks or other recreational facilities, such that substantial physical deterioration of the facility would occur or be accelerated. Based on the *L.A. 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, considering, as applicable, scheduled improvements to recreation and park services (renovation, expansion, or addition) and the Project's proportional contribution to the demand; and (c) whether the Project includes features that would reduce the demand for park services (e.g., on-site recreation facilities, land dedication, or direct financial support to the Department of Recreation and Parks).

The proposed Project would result in an increase of visitors and employees. Visitors would be temporary users of the recreational facilities, and as noted above, there would a net increase in approximately 40 employees to the Project site. However most of these employees would already live nearby, therefore not contributing to the overall population growth. Additionally, the Project includes on-site recreational amenities intended to serve some of the needs of the hotel guests. Notwithstanding the availability of on-site recreational amenities, it may be assumed that the future guests of the Project would utilize recreation and park facilities in the surrounding area. There are several existing parks and recreation centers that are located within the surrounding area and larger regional facilities located further away. The Project would not include the addition of permanent residents, and with the on-site amenities, it is not expected that the Project would substantially increase the use of existing neighborhood and regional parks or other recreational facilities to the extent that substantial physical deterioration of such facilities would result. Impacts would be less than significant.

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?

Less than Significant Impact. A significant impact could occur if a project were to include or require the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment. The Project does not include recreational facilities or require the construction or expansion of such facilities. As such, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

4.16 TRANSPORTATION AND TRAFFIC

The following section summarizes and incorporates by reference information from the *Traffic Impact Study, 2005 James M Wood Boulevard Hotel Project*, dated February 17, 2017 (Traffic Study) prepared by Linscott, Law & Greenspan, Engineers for the Applicant and the review memorandum dated April 6, 2017 by LADOT, as contained in **Appendix D of this Initial Study**.

- 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?***

Less than Significant Impact. A significant impact could occur if the Project were to result in substantial increases in traffic volumes in the vicinity of the Project such that the existing street capacity experiences a decrease in the existing volume-to-capacity (V/C) ratios or experiences increased traffic congestion exceeding LADOT's recommended level of service.

Operational Traffic

Seventeen study intersections were identified, in coordination with LADOT staff, for inclusion in the traffic analysis. The analyzed locations are shown in the Traffic Study and correspond to locations where potential traffic impacts from the Project are most likely to occur. The intersections identified for analysis are as follows:

1. Hoover Street/James M Wood Boulevard
2. Hoover Street/Olympic Boulevard
3. Alvarado Street/7th Street
4. Alvarado Street/8th Street
5. Alvarado Street/James M Wood Boulevard
6. Alvarado Street/Olympic Boulevard
7. Union Avenue/James M Wood Boulevard

Estimated Trip Generation

Trip generation estimates for the Project were reviewed and approved by LADOT and were calculated using trip generation rates contained in *Trip Generation, 9th Edition*. **Table 4.16-1, Trip Generation Estimates**, summarizes the trip generation estimates for the daily AM peak-hour and PM peak-hour periods, respectively. In addition to calculating the trip rates for the specific components of the proposed

Project, credits and offsets were calculated. The existing uses on the Project site would be removed, thus future traffic conditions surrounding the Project site would not include trips associated with the existing uses of the Project site. The Trip Generation manual also assumes separate, distinct land uses. However, there will be some internal activity by on-site hotel guests without generating off-site traffic. In addition, due to its proximity to transit, some of the trips assumed in the Trip Generation manual would occur by transit rather than private vehicle. Finally, there would be some trips to the Project site that would be drawn from existing traffic passing the site and thus would not be considered new trips. Based on these factors, the trip calculation was adjusted accordingly.

As shown in **Table 4.16-1**, the Project would generate a net increase of 545 weekday trips, including 42 morning peak-hour trips and 38 afternoon peak-hour trips.

Project Impacts

Existing with Project Impacts

Project traffic was added to the surrounding existing traffic conditions, and the potential for impacts was evaluated. **Table 4.16-2, Existing with Project Conditions—Intersection Level of Service, AM/PM Peak Hours**, summarizes the level of service for the existing with Project conditions at the analyzed intersections for the AM and PM peak hours, respectively. Based on the City's guidelines, an impact could be significant if one of the following scenarios would occur: at an intersection with Level of Service C if the volume-to-capacity (V/C) ratio increased by .04 or greater; at an intersection with Level of Service D if the volume-to-capacity (V/C) ratio increased by .02 or greater; or at an intersection with Level of Service E or F if the volume-to-capacity (V/C) ratio increased by .01 or greater. The analysis summarized in **Table-4.16-2** indicates that for the AM/PM peak hour, the addition of Project traffic would not cause an increase in V/C ratios above the threshold. Therefore, it is concluded that the Project would not cause any significant traffic impacts compared to existing conditions in either the AM or PM peak hours.

Future with Project Impacts

Table 4.16-3, Future without and with Project Conditions—Intersection Level of Service, AM/PM Peak Hours, summarizes the results of the future with Project conditions intersections analysis during the weekday morning and afternoon peak hours. The future with Project conditions were compared to the future without Project conditions to assess the impacts of the Project as compared to the future environment without of the Project. In addition, potential net increases in average daily vehicle trips and peak-hour vehicle trips from the related projects were taken into consideration. Based on the City's significance criteria, the change in traffic flow generated by the Project when compared to conditions without the Project, is not anticipated to result in a significant impact at any of the study intersections under future conditions.

**Table 4.16-1
Trip Generation Estimates for Project**

Land Use (ITE Code)	Size	Units	Daily	AM Peak-Hour Trips			PM Peak-Hour Trips		
				In	Out	Total	In	Out	Total
Proposed Project									
Hotel	100	rooms	817	31	22	53	31	29	60
Deduction for transit (15%)			(123)	(5)	(3)	(8)	(5)	(4)	(9)
Project Subtotal			694	26	19	45	26	25	51
Existing Uses									
Retail	(8,228)	glsf	351	5	3	8	15	16	31
Deduction for transit (15%)			(53)	(1)	(0)	(1)	(2)	(2)	(4)
Deduction for pass-by trips (50%)			(149)	(2)	(2)	(4)	(7)	(7)	(14)
Existing Subtotal			149	2	1	3	6	7	13
Total Net Project Trips			545	24	18	42	20	18	38

*Source: Traffic Impact Study, Linscott, Law & Greenspan, Engineers (February 17, 2017).
glsf = Gross Leasable Square Feet*

Table 4.16-2
Existing with Project Conditions—Intersection
Level of Service, AM/PM Peak Hours

No.	Intersection	Peak Hour	Existing 2017		Existing 2017 with Project		Change in V/C	Significant Impact?
			V/C	LOS	V/C	LOS		
1	Hoover Street/James M Wood Boulevard	AM	0.721	C	0.723	C	0.002	No
		PM	0.702	C	0.704	C	0.002	No
2	Hoover Street/Olympic Boulevard	AM	0.873	D	0.875	D	0.002	No
		PM	0.834	D	0.834	D	0.000	No
3	Alvarado Street/7th Street	AM	0.538	A	0.541	A	0.003	No
		PM	0.585	A	0.586	A	0.001	No
4	Alvarado Street/8th Street	AM	0.614	B	0.617	B	0.003	No
		PM	0.633	B	0.635	B	0.002	No
5	Alvarado Street/James M Wood Boulevard	AM	0.692	B	0.699	B	0.007	No
		PM	0.701	C	0.708	C	0.007	No
6	Alvarado Street/Olympic Boulevard	AM	0.756	C	0.760	C	0.004	No
		PM	0.797	C	0.803	D	0.006	No
7	Union Avenue/James M Wood Boulevard	AM	0.773	C	0.775	C	0.002	No
		PM	0.761	C	0.762	C	0.001	No

Source: Linscott, Law & Greenspan, Engineers (February 17, 2017)

LOS = level of service; V/C = volume to capacity.

**Table 4.16-3
Future without and with Project Conditions—
Intersection Level of Service, AM/PM Peak Hours**

No.	Intersection	Peak Hour	Future 2019 without Project		Future 2019 with Project		Change in V/C	Significant Impact?
			V/C	LOS	V/C	LOS		
1	Hoover Street/James M Wood Boulevard	AM	0.845	D	0.847	D	0.002	No
		PM	0.893	D	0.895	D	0.002	No
2	Hoover Street/Olympic Boulevard	AM	1.003	F	1.005	F	0.002	No
		PM	1.104	F	1.104	F	0.000	No
3	Alvarado Street/7th Street	AM	0.697	B	0.698	B	0.001	No
		PM	0.796	C	0.797	C	0.001	No
4	Alvarado Street/8th Street	AM	0.785	C	0.787	C	0.002	No
		PM	0.843	D	0.846	D	0.003	No
5	Alvarado Street/James M Wood Boulevard	AM	0.853	D	0.861	D	0.008	No
		PM	0.923	E	0.930	E	0.007	No
6	Alvarado Street/Olympic Boulevard	AM	0.885	D	0.888	D	0.003	No
		PM	1.045	F	1.050	F	0.005	No
7	Union Avenue/ James M Wood Boulevard	AM	0.985	E	0.987	E	0.002	No
		PM	1.068	F	1.069	F	0.001	No

Source: Linscott, Law & Greenspan, Engineers (February 17, 2017)

Congestion Management Plan Analysis

The Los Angeles County Congestion Management Plan (CMP) requires that when a Traffic Impact Assessment (TIA) is prepared for a project, traffic and transit impact analyses be conducted for select regional facilities based on the amount of project traffic expected to use these facilities.

CMP Significant Traffic Impact Criteria

The *CMP Guidelines* state that a CMP freeway analysis must be conducted if 150 or more trips attributable to the proposed Project are added to a mainline freeway-monitoring location in either direction during the morning or afternoon weekday peak hours. Similarly, a CMP arterial monitoring station analysis must be conducted if 50 or more peak-hour project trips are added to a CMP arterial monitoring station during the morning or afternoon weekday peak hours of adjacent street traffic.

A significant project-related CMP impact would be identified if the CMP facility is projected to operate at LOS F ($V/C > 1.00$) and if the project traffic causes an incremental change in the V/C ratio of 0.02 or greater. The proposed Project would not be considered to have a regionally significant impact, regardless of the increase in V/C ratio, if the analyzed facility is projected to operate at LOS E or better after the addition of the project traffic.

There is one CMP intersection-monitoring location within the vicinity of the Project:

- CMP Station No. 85, located at Wilshire Boulevard & Alvarado Street.

Based on the trip distribution analysis in the Traffic Impact Study, the Project would not contribute 50 or more new trips at these intersections during the morning or afternoon weekday peak hours.

The two CMP freeway-monitoring stations closest to the Project vicinity includes:

- CMP Station No. 1013, located on the I-10 Freeway at Budlong Avenue.
- CMP Station No. 1048, located at I-110 Freeway south of SR-101 Freeway.

As shown in **Table 4.16-1**, the Project would not generate 150 or more trips (in either direction) during the morning or afternoon weekday peak period. Thus, no further review of the Project's potential impacts to CMP freeway-monitoring locations is required. Impacts would be less than significant.

Regional Transit Impact Analysis

An analysis of potential Project impacts on the transit system was also performed, per the CMP requirements and guidelines. The CMP provides a methodology for estimating the number of transit trips expected to result from a proposed project based on the number of vehicle trips. This methodology assumes an average vehicle occupancy (AVO) factor of 1.4 to estimate the number of person-trips to and from the Project.

The CMP guidelines estimate that approximately 10 percent of total project person-trips may use public transit to travel to and from the site if the site is within 0.25 miles of a CMP transit center. The nearest station from the Project site is Metro's Alvarado Street/James M Wood Boulevard stop, located approximately 0.1 miles west of the Project site. Assuming an AVO of 1.4, the Project is estimated to generate approximately 77 daily transit trips, 6 morning peak-hour trips and 6 afternoon peak-hour trips. Using the 10 percent mode split suggested in the CMP, the Project would generate approximately 6 transit trips during the weekday morning peak-hour and 6 transit trips during the weekday afternoon peak hour.

The Project location is well served by numerous established transit routes. A review of the schedules of the lines serving the area (Metro, DASH, Big Blue Bus and Foothill Transit) shows a total of 91 buses or

trains during the AM peak and 81 buses or trains during the PM peak.³⁶ With multiple public transportation opportunities within the Project vicinity, including bus routes and Metro lines, the existing transit service in the Project vicinity would adequately accommodate the new transit trips generated by the Project. Thus, based on the calculated number of generated transit trips, impacts to the existing or future regional transit system in the vicinity of the Project site are not anticipated to be significant.

Construction—Traffic

The 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 Project. The demolition and site clearing phase has been estimated by the Project Applicant to require approximately 2,511 hauling trips. The Haul Route would utilize Western Avenue from Olympic Boulevard south to Interstate 10. The addition of these vehicles into the street system would contribute to increased traffic in the Project vicinity. The haul trips would occur outside of the peak hours. As stated above in **Table 4.16-1**, the operation of the Project is not expected to generate more than 1,200 trips per day. The Project's peak construction trip traffic is estimated at approximately 330 trips per day.³⁷ Therefore, it is not anticipated that the construction trips would contribute to a significant increase in the overall congestion in the Project vicinity. In addition, any truck trips would be limited to the length of time required for the Project's construction. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

36 Linscott, Law & Greenspan, Engineers, *Traffic Impact Study, 2005 James M Wood Boulevard Hotel Project*, (February 17, 2017).

37 Derived from construction worker and vendor trip rates contained in *California Emissions Estimator Users Guide*, Appendix E, "Technical Source Documentation," California Air Pollution Control Officers Association (July 2013).

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?

No Impact. As discussed previously in **Section 4.16a**, no CMP freeway-monitoring segment or intersection analysis is required, and there would be no Project-related impacts to the CMP. The Project would not conflict with any travel demand measures. No impacts would occur.

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 Project only if it involved an aviation-related use or would influence changes to existing flight paths. No aviation-related use or changes to existing flight paths, would occur. No impacts 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)?

Less than Significant Impact. A significant impact could occur if a project were to include new roadway design or introduce 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 access or other features were designed in such a way as to create hazardous conditions. The Project would include a new vehicular access driveway to the site from James M Wood Boulevard. This driveway would be properly designed and constructed to ensure the safety of vehicular and pedestrian circulation in the Project area. Therefore, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

e. Would the project result in inadequate emergency access?

Less than Significant Impact. 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 a project or adjacent uses.

As previously discussed, the Project site is located at 2005 James M Wood Boulevard, and is bordered by James M Wood Boulevard and, extending north, along South Westlake Avenue approximately 150 feet.

Neither James M Wood Boulevard nor South Westlake Avenue is a selected disaster route as identified by the City's General Plan.³⁸ However, the Project site is approximately 350 feet to the east of South Alvarado Street, which is a selected disaster route.

Construction of the Project site may require temporary and/or partial street and sidewalk closures due to construction activities. Any such closures would be temporary in nature and would be coordinated with the City of Los Angeles Departments of Transportation, Building and Safety, and Public Works. While such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans.

As described previously, the Project would satisfy the emergency response requirements of the LAFD. No hazardous design features are included in the access design or site plan for the Project that could impede emergency access. Furthermore, the Project would be subject to the site plan review requirements of both the LAFD and the LAPD to ensure that all access roads, driveways, and parking areas would remain accessible to emergency service vehicles. The Project would not be expected to result in inadequate emergency access. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

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?

Less than Significant Impact with Project Mitigation. For the purpose of this Initial Study, a significant impact could occur if a project were to conflict with adopted polices or involve modification of existing alternative transportation facilities on or off site. The Project would not require the disruption of public transportation services or the alteration of public transportation routes. Furthermore, the Project would not interfere with any Class I or Class II bikeway systems. However, the construction process could temporarily close sidewalks adjacent to the site. As such, potential impacts on pedestrian facilities could occur and the mitigation described below shall be incorporated into the Project.

Mitigation Measures: The incorporation of the following mitigation measure into the Project would reduce impacts to a less than significant level.

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

MM-TRAF-1: Work Area Traffic Management Plan

- The Project Applicant shall submit a formal Work Area Traffic Control Plan for review and approval by the Department of Building and Safety prior to the issuance of any construction permits. This plan shall incorporate safety measures around the site to reduce the risk to pedestrian traffic near the work area. This plan shall identify traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activity. This plan shall include:
 - 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 shall be adjacent to the 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.

4.17 TRIBAL CULTURAL RESOURCES

- a. **Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe and that is Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)**

Less than Significant Impact. As described in section 4.5a, **Cultural Resources**, above, the Project site does not contain any features that are listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources; nor would the Project adversely affect any nearby resources that are listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources. Therefore, potential 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 a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.**

Less than Significant Impact. Public Resources Code, Section 21080.3.1, establishes a formal process for Lead Agencies to consult with California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in Section 20174 of the Public Resources Code. In compliance with the Code, on September 7, 2017 the City sent notices to Native American tribes that are known to be traditionally and culturally affiliated with the Project area and have requested to be notified of projects. A response was received from the Gabrieleno Band of Mission Indians – Kizh Nation and the City subsequently consulted with the tribe regarding the potential to unearth subsurface artifacts during construction. The City has an established protocol that will be imposed as a condition of approval for handling cultural artifacts unearthed during construction. Given that no Tribal Cultural Resources have been identified on the site and there is not specific evidence of subsurface resource on the site, impacts to Tribal Cultural Resources would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

4.18 UTILITIES AND SERVICE SYSTEMS

Impact Analysis

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

Less than Significant Impact. A significant impact would occur if a project were to exceed wastewater treatment requirements of the applicable RWQCB. Section 13260 of the California Water Code states that persons 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 containing information that may be required by the appropriate RWQCB. The RWQCB then authorizes an NPDES permit that ensures compliance with wastewater treatment and discharge requirements. Currently, wastewater from the Project site is conveyed via municipal sewage infrastructure maintained by the Los Angeles Bureau of Sanitation to the Hyperion Treatment Plant (HTP), a public facility subject to the State's wastewater treatment requirements. Wastewater from the Project would continue to be conveyed through City sewage infrastructure to the HTP. Though the Project would generate more wastewater than is currently generated on the Project site, pollutant loads would be typical of urban wastewater already processed by the HTP. Furthermore, as discussed below, the HTP has the available capacity to accommodate the additional waste associated with the Project. As such, impacts would be less than significant.

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 could occur if a project were to increase water consumption or wastewater generation to such a degree that the capacity of facilities currently serving the project site would be exceeded. Water is provided by the Los Angeles Department of Water and Power (LADWP); the Los Angeles Bureau of Sanitation provides sewer service to the proposed Project area.

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. Water entering the Los Angeles Aqueduct Filtration Plant (LAAFP) undergoes treatment and disinfection before being distributed throughout the LADWP's Water Service Area. The LAAFP has the capacity to treat approximately 600 million gallons per day (mgd). The average plant flow is approximately 362 mgd averaged over calendar year 2013, and

operates at approximately 60 percent capacity. Therefore, the LAAFP has a remaining capacity of approximately 238 mgd, depending on the season.³⁹

The Los Angeles Bureau of Sanitation provides sewer service to the proposed Project area. Sewage from the 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.⁴⁰ This equals a remaining capacity of 88 mgd of wastewater able to be treated at the HTP.

The Project site is in a developed, urbanized portion of Los Angeles that is served by existing water and sewer mains. As shown in **Table 4.18-1, Estimated Water Demand**, below, it is estimated that the Project would have a net daily water demand of 14,742 gallons or an annual demand of 16.51 acre-feet. Water conservation design features are likely to reduce this estimate. Given the remaining capacity of the LAAFP, the Project would not require or result in the construction of new water treatment facilities or expansion of existing facilities. Furthermore, the Project Applicant shall be required to implement applicable LA Green Building Code requirements that would further reduce water flow. Impacts on water treatment facilities would be less than significant.

As shown in **Table 4.18-2, Estimated Sewage Generation**, below, it is estimated that the Project would generate a net increase of 11,794 gpd of wastewater. Given the available capacity of the HTP, the Project would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities. Impacts on wastewater treatment facilities would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

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?

Less than Significant Impact. A significant impact could occur if the volume of stormwater runoff would increase to a level exceeding the capacity of the existing storm drain system. The Project site is in a developed portion of Los Angeles that is currently served by stormwater infrastructure. In addition, the Project would be required to demonstrate compliance with the Los Angeles Low Impact Development (LID) Ordinance standards and retain or treat the first three-quarter inch of rainfall in a 24-hour period. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

39 Los Angeles Department of Water and Power, *Urban Water Management Plan* (2016)

40 City of Los Angeles Department of Public Works, Bureau of Sanitation, *Wastewater System Fact Sheet* (2014)

**Table 4.18-1
Estimated Water Demand**

Land Use	Quantity	Demand Factor (gpd/unit) ^a	Daily Demand (gpd)	Annual Demand (afy)
Hotel	100 rooms	150 gpd/room	15,000 gpd	16.80
Existing Use -Retail	8,228 sq ft	31 gpd/1000 Gr sq ft	257.12 gpd	0.23
Total:			14,742 gpd	16.51

Note: afy = acre-feet per year; gpd = gallons per day; sq ft = square feet.

^a 125 percent sewage generation loading factor; Los Angeles Bureau of Sanitation, Sewage Generation Factors, April 2012.

**Table 4.18-2
Estimated Sewage Generation**

Land Use	Quantity	Factor (gpd/unit) ^a	Daily Generation (gpd)
Hotel	100 rooms	120 gpd/room	12,000 gpd
Existing Use -Retail	8,228 sq ft	25 gpd/1000 Gr sq ft	205.7 gpd
Total:			11,794 gpd

Note: gpd = gallons per day.

^a Los Angeles Bureau of Sanitation, Sewage Generation Factors, April 2012.

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 were to increase water consumption to such a degree that new water sources would need to be identified. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the 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 completion; (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.

According to the 2015 City's Urban Water Management Plan (UWMP), the City's projected demand for water, during a single dry season would be 513,540 acre-feet per year (afy) for 2015 and 611,800 afy for 2020.⁴¹ The *UWMP* projects adequate water supplies through 2040. The net Project demand of 14,742

⁴¹ City of Los Angeles Department of Public Works, *2015 City of Los Angeles Urban Water Management Plan* (2016).

gpd would be approximately 2.9 percent of the City of Los Angeles' available capacity during a single dry year. As such, it is expected that LADWP has sufficient water supplies available to serve the Project.⁴² Furthermore, as previously stated, the Project Applicant shall adhere to current standards including the Green Building Code that would reduce demand on local water supplies. Impacts of the Project would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

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 upon the criteria established in the *L.A. 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. As stated above, the Hyperion Treatment Plant is expected to have capacity to serve the Project. As such, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

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 could 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 *L.A. 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 the 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 (SWMPP), or the Framework Element of the

42 City of Los Angeles Department of Public Works, *2015 City of Los Angeles Urban Water Management Plan* (2016).

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, and transformed at a waste-to-energy facility, or disposed of at a landfill. Within the City of Los Angeles, 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.⁴³ The Manning Pit Landfill has a remaining capacity of 540,000 tons.⁴⁴ Thus, the Chiquita Canyon Landfill and Manning Pit Landfill combined have a remaining permitted capacity of approximately 5.4 million tons. The Chiquita Canyon Landfill has an estimated remaining life of 4 years. An expansion of the Chiquita Canyon Landfill is currently proposed and would add a capacity of 23,872,000 tons (a 21-year life expectancy).

Construction of the Project would comply with the City's Citywide Construction and Demolition (C&D) Waste Recycling Ordinance. As such, construction waste would be removed from the Project site by a City-permitted solid waste hauler and taken to a City-certified C&D processing facility. As shown in **Table 4.18-3, Expected Operational Solid Waste Generation**, the Project's net generation during the life of the Project would be 150.64 pounds per day.

This estimate is conservative because it does not factor in any recycling or waste diversion programs. The amount of solid waste generated by the Project is within the available capacities at area landfills. Furthermore, the Project Applicant shall be required to comply with the following regulatory measures regarding recycling. As such, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

43 County of Los Angeles Department of Public Works, *Los Angeles Countywide Integrated Waste Management Plan, 2011 Annual Report* (March 2013).

44 County of Los Angeles Department of Public Works (February 2014).

**Table 4.18-3
Expected Operational Solid Waste Generation**

Type of Use	Size	Waste Generation Rate ^a (lb./unit/day)	Total Solid Waste Generated (lb./day)
Residential units	100 rooms	2 lb/room/day	200 lb/day
Existing – Retail	8,228 sq ft	.006 lb/sq ft/day	49.36 lbs/day
Total Project Waste Generation			150.64 lbs/day

Notes: lb. = pounds

^a City of Los Angeles Bureau of Sanitation, *Solid Waste Generation (1981)*. Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.

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

Less than Significant Impact. A significant impact could occur if a project were to generate solid waste that was not disposed of in accordance with applicable regulations. The Project would generate solid waste during both construction and operation that is typical of a commercial building with ground-floor commercial uses and would comply with all federal, State, and local statutes and regulations regarding proper disposal. As such, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

4.19 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?*

Less than Significant Impact. A significant impact could occur only if the Project would have an identified potentially significant impact for any of the issues cited above: quality of the environment; habitat or populations of fish or wildlife species; plant or animal communities; rare or endangered plant or animal; or important examples of the major periods of California history or prehistory. As indicated by the analysis in this Initial Study, the Project would not substantially reduce the habitat of fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; or reduce the number or restrict the range of a rare or endangered plant or animal. Nor would the Project potentially affect important historic or prehistoric resources. Though potentially significant impacts were identified with respect to construction noise, implementation of the mitigation measures described in this Initial Study would reduce those impacts to less than significant levels. Therefore, impacts on the quality of the environment would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

- 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.)*

Less Than Significant Impact. Cumulative impacts can occur when the impacts of two or more separate projects are considerable when considered together. In the preceding topical analyses, cumulative impacts have been considered where appropriate. For example, the evaluation of air quality impacts considered the Project's cumulative contribution to federal or State nonattainment pollutants within the South Coast Air Basin and the evaluation of traffic impacts considered the cumulative effect of other proposed projects in the immediate vicinity. Through the analyses, no significant cumulative impacts were identified for the Project.

Mitigation Measures: No mitigation measures are necessary.

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

Less than Significant Impact with Project Mitigation. As discussed in the preceding sections, the Project could result in potentially significant impacts due to construction noise. Mitigation Measures **MM NOI-1** as listed in **Section 4.12, Noise** respectively, have been identified to address these impacts.

Mitigation Measures: Applicable mitigation measures have been identified in the Noise section in this Initial Study. With incorporation of these measures, impacts of the Project would be less than significant.

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