


CITY OF LOS ANGELES OFFICE OF THE CITY CLERK ROOM 395, CITY HALL LOS ANGELES, CALIFORNIA 90012 CALIFORNIA ENVIRONMENTAL QUALITY ACT PROPOSED MITIGATED NEGATIVE DECLARATION		
LEAD CITY AGENCY City of Los Angeles	COUNCIL DISTRICT 14	
PROJECT TITLE ENV-2008-386-MND	CASE NO. CPC-2008-596-GPA-ZC-SPR, TT-72307	
PROJECT LOCATION 233 West Washington Blvd.		
PROJECT DESCRIPTION The proposed project is the construction of an approximately 271,119 square foot, 95 feet and 9 inch height, 7-story, mixed use building, consisting of 160 units and an approximately 24,000 square foot ground floor retail space. A total of 173 parking spaces are proposed within two complete levels of subterranean parking, with 139 parking spaces for residential use and 34 parking spaces for commercial use. The lot size is 35,096 square feet. Building and paving would cover 89% of the project site. The residential portion of the project includes a 6,740 square foot community room on the first floor (with a library and recreation room), and a 6,724 square foot common open space area on the second floor. The project includes 68 bicycle spaces for commercial use and 176 bicycle spaces for residential use. The requested entitlements are: 1) Tentative Tract Map for a condominium subdivision and the reduction per the Advisory Agency's Parking Policy No. AA-2000-1 to allow parking reduction of .87 per dwelling unit in lieu of 2 parking space per dwelling unit and 0 guest parking spaces per unit and 2) a General Plan Amendment from Light Industrial to Community Commercial, 3) Zone Change from M2-2-0 to C2-2-0 and a Site Plan Review.		
NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY Donna Tripp Craig Lawson & Co., LLC 8758 Vencie Blvd., Suite 200 Los Angeles, CA 90034		
FINDING: The City Planning Department of the City of Los Angeles has Proposed that a mitigated negative declaration be adopted for this project because the mitigation measure(s) outlined on the attached page(s) will reduce any potential significant adverse effects to a level of insignificance (CONTINUED ON PAGE 2)		
SEE ATTACHED SHEET(S) FOR ANY MITIGATION MEASURES IMPOSED.		
Any written comments received during the public review period are 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 THIS FORM ONDREA TYE	TITLE Planning Assistant	TELEPHONE NUMBER (818) 978-1197
ADDRESS 200 N. SPRING STREET, 7th FLOOR LOS ANGELES, CA. 90012	SIGNATURE (Official) 	DATE 05/16/14

I-10. Aesthetics (Landscape Plan)

- Environmental impacts to the character and aesthetics of the neighborhood may result from project implementation. However, the potential impacts will be mitigated to a less than significant level by the following measure:
- All open areas not used for buildings, driveways, parking areas, recreational facilities or walks shall be attractively landscaped and maintained in accordance with a landscape plan and an automatic irrigation plan, prepared by a Landscape Practitioner (Sec. 12.40-D) and to the satisfaction of the decision maker.

I-90. Aesthetics (Vandalism)

- Environmental impacts may result from project implementation due to graffiti and accumulation of rubbish and debris along the wall(s) adjacent to public rights-of-way. However, this potential impact will be mitigated to a less than significant level by the following measures:
- Every building, structure, or portion thereof, shall be maintained in a safe and sanitary condition and good repair, and free from, debris, rubbish, garbage, trash, overgrown vegetation or other similar material, pursuant to Municipal Code Section 91.8104.
- The exterior of all buildings and fences shall be free from graffiti when such graffiti is visible from a street or alley, pursuant to Municipal Code Section 91.8104.15.

I-110. Aesthetics (Signage on Construction Barriers)

- Environmental impacts may result from project implementation due to on-site signage in excess of that allowed under the Los Angeles Municipal Code Section 91.6205. However, the potential impact will be mitigated to a less than significant level by the following measures:
- The applicant shall affix or paint a plainly visible sign, on publically accessible portions of the construction barriers, with the following language: "POST NO BILLS".
- Such language shall appear at intervals of no less than 25 feet along the length of the publically accessible portions of the barrier.
- The applicant shall be responsible for maintaining the visibility of the required signage and for maintaining the construction barrier free and clear of any unauthorized signs within 48 hours of occurrence.

I-120. Aesthetics (Light)

- Environmental impacts to the adjacent residential properties may result due to excessive illumination on the project site. However, the potential impacts will be mitigated to a less than significant level by the following measure:
- Outdoor lighting shall be designed and installed with shielding, such that the light source cannot be seen from adjacent residential properties or the public right-of-way.

I-130. Aesthetics (Glare)

- Environmental impacts to adjacent residential properties may result from glare from the proposed project. However, the potential impacts will be mitigated to a less than significant level by the following measure:
- The exterior of the proposed structure shall be constructed of materials such as, but not limited to, high-performance and/or non-reflective tinted glass (no mirror-like tints or films) and pre-cast concrete or fabricated wall surfaces to minimize glare and reflected heat.

III-10. Air Pollution (Demolition, Grading, and Construction Activities)

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- All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.
- The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.
- All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust.
- All dirt/soil loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.
- All dirt/soil materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.
- General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.
- Trucks having no current hauling activity shall not idle but be turned off.

IV-70. Tree Removal (Non-Protected Trees)

- Environmental impacts from project implementation may result due to the loss of significant trees on the site. However, the potential impacts will be mitigated to a less than significant level by the following measures:
- Prior to the issuance of any permit, a plot plan shall be prepared indicating the location, size, type, and general condition of all existing trees on the site and within the adjacent public right(s)-of-way.
- All significant (8-inch or greater trunk diameter, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground) non-protected trees on the site proposed for removal shall be replaced at a 1:1 ratio with a minimum 24-inch box tree. Net, new trees, located within the parkway of the adjacent public right(s)-of-way, may be counted toward replacement tree requirements.
- Removal or planting of any tree in the public right-of-way requires approval of the Board of Public Works. Contact Urban Forestry Division at: 213-847-3077. All trees in the public right-of-way shall be provided per the current standards of the Urban Forestry Division the Department of Public Works, Bureau of Street Services.

IV-80. Tree Removal (Locally Protected Species)

- Environmental impacts may result due to the loss of protected trees on the site. However, these potential impacts will be mitigated to less than significant level by the following measures:
- All protected tree removals require approval from the Board of Public Works.
- A Tree Report shall be submitted to the Urban Forestry Division of the Bureau of Street Services, Department of Public Works, for review and approval (213-847-3077), prior to implementation of the Report's recommended measures.
- A minimum of two trees (a minimum of 48-inch box in size if available) shall be planted for each protected tree that is removed. The canopy of the replacement trees, at the time they are planted, shall be in proportion to the canopies of the protected tree(s) removed and shall be to the satisfaction of the Urban Forestry Division.
- The location of trees planted for the purposes of replacing a removed protected tree shall be clearly indicated on the required landscape plan, which shall also indicate the replacement tree species and further contain the phrase "Replacement Tree" in its description.
- Bonding (Tree Survival):
- a. The applicant shall post a cash bond or other assurances acceptable to the Bureau of Engineering in consultation with the Urban Forestry Division and the decision maker guaranteeing the survival of trees required to be maintained, replaced or relocated in such a fashion as to assure the existence of continuously living trees for a minimum of three years from the date that the bond is posted or from the date such trees are replaced or relocated, whichever is longer. Any change of ownership shall require that the new owner post a new oak tree bond to the satisfaction of the Bureau of Engineering. Subsequently, the original owner's oak tree bond may be exonerated.
- b. The City Engineer shall use the provisions of Section 17.08 as its procedural guide in satisfaction of said bond requirements and processing. Prior to exoneration of the bond, the owner of the property shall provide evidence satisfactory to the City Engineer and Urban Forestry Division that the oak trees were properly replaced, the date of the replacement and the survival of the replacement trees for a period of three years.

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

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

V-20. Cultural Resources (Archaeological)

- Environmental impacts may result from project implementation due to discovery of unrecorded archaeological resources. However, the potential impacts will be mitigated to a less than significant level by the following measures:
- If any archaeological materials are encountered during the course of project development, all further development activity shall halt and:

- The services of an archaeologist shall then be secured by contacting the South Central Coastal Information Center (657-278-5395) located at California State University Fullerton, or a member of the Society of Professional Archaeologist (SOPA) or a SOPA-qualified archaeologist, who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact.
 - The archaeologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource.
 - The applicant shall comply with the recommendations of the evaluating archaeologist, as contained in the survey, study or report.
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- Project development activities may resume once copies of the archaeological survey, study or report are submitted to: SCCIC Department of Anthropology, McCarthy Hall 477, CSU Fullerton, 800 North State College Boulevard, Fullerton, CA 92834.
 - Prior to the issuance of any building permit, the applicant shall submit a letter to the case file indicating what, if any, archaeological reports have been submitted, or a statement indicating that no material was discovered.
 - A covenant and agreement binding the applicant to this condition shall be recorded prior to issuance of a grading permit.

VI-10. Seismic

- *Environmental impacts to the safety of future occupants may result due to the project's location in an area of potential seismic activity. However, this potential impact will be mitigated to a less than significant level by the following measure:*
- The design and construction of the project shall conform to the California Building Code seismic standards as approved by the Department of Building and Safety.

VI-20. Erosion/Grading/Short-Term Construction Impacts

- Short-term erosion impacts may result from the construction of the proposed project. However, these impacts can be mitigated to a less than significant level by the following measures:
- The applicant shall provide a staked signage at the site with a minimum of 3-inch lettering containing contact information for the Senior Street Use Inspector (Department of Public Works), the Senior Grading Inspector (LADBS) and the hauling or general contractor.
- Chapter IX, Division 70 of the Los Angeles Municipal Code addresses grading, excavations, and fills. All grading activities require grading permits from the Department of Building and Safety. Additional provisions are required for grading activities within Hillside areas. The application of BMPs includes but is not limited to the following mitigation measures:
 - a. Excavation and grading activities shall be scheduled during dry weather periods. If grading occurs during the rainy season (October 15 through April 1), diversion dikes shall be constructed to channel runoff around the site. Channels shall be lined with grass or roughened pavement to reduce runoff velocity.
 - b. Stockpiles, excavated, and exposed soil shall be covered with secured tarps, plastic sheeting, erosion control fabrics, or treated with a bio-degradable soil stabilizer.

VI-50. Geotechnical Report

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

VIII-20. Explosion/Release (Methane Gas)

- Environmental impacts may result from project implementation due to its location in an area of potential methane gas zone. However, this potential impact will be mitigated to a less than significant level by the following measures:

- All commercial, industrial, and institutional buildings shall be provided with an approved Methane Control System, which shall include these minimum requirements; a vent system and gas-detection system which shall be installed in the basements or the lowest floor level on grade, and within underfloor space of buildings with raised foundations. The gas-detection system shall be designed to automatically activate the vent system when an action level equal to 25% of the Lower Explosive Limit (LEL) methane concentration is detected within those areas.
- All commercial, industrial, institutional and multiple residential buildings covering over 50,000 square feet of lot area or with more than one level of basement shall be independently analyzed by a qualified engineer, as defined in Section 91.7102 of the Municipal Code, hired by the building owner. The engineer shall investigate and recommend mitigation measures which will prevent or retard potential methane gas seepage into the building. In addition to the other items listed in this section, the owner shall implement the engineer's design recommendations subject to Department of Building and Safety and Fire Department approval.
- All multiple residential buildings shall have adequate ventilation as defined in Section 91.7102 of the Municipal Code of a gas-detection system installed in the basement or on the lowest floor level on grade, and within the underfloor space in buildings with raised foundations.
- All single-family dwellings with basements shall have a gas detection system which is periodically calibrated and maintained in proper operating condition in accordance with manufacturer's installation and maintenance specifications.

VIII-90. Listed Sites (Removal of Underground Storage Tanks)

- Environmental impacts may result from the potential soil and/or groundwater contamination from the existing underground storage tanks (USTs) used by the gas station to store petroleum. However, the potential impacts will be mitigated to a less than significant level by the following measures:
- Underground Storage Tanks shall be decommissioned or removed as determined by the Los Angeles City Fire Department Underground Storage Tank Division. If any contamination is found, further remediation measures shall be developed with the assistance of the Los Angeles City Fire Department and other appropriate State agencies.
- Prior to issuance of a use of land or building permit, a letter certifying that remediation is complete from the appropriate agency (Department of Toxic Substance Control or the Regional Water Quality Control Board) shall be submitted to the decision maker.

X-10. General Plan Designation/Zoning

- The proposed project would permit intensities and or densities exceeding those permitted by the existing _____ District Plan. However, this potential impact will be mitigated to a level of insignificance by the following measure:
- The applicant shall comply with mitigation measures required by this mitigated negative declaration (MND).

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

- The project shall comply with the City of Los Angeles Noise Ordinance No. 144,331 and 161,574, and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.
- Construction and demolition shall be restricted to the hours of 7:00 am to 6:00 pm Monday through Friday, and 8:00 am to 6:00 pm on Saturday.
- Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.
- The project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.

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

- Environmental impacts may result from project implementation due to noise from cars using the parking ramp. However, the potential impacts will be mitigated to a less than significant level by the following measures:
- Concrete, not metal, shall be used for construction of parking ramps.
- The interior ramps shall be textured to prevent tire squeal at turning areas.
- Parking lots located adjacent to residential buildings shall have a solid decorative wall adjacent to the residential.

XII-60. Increased Noise Levels (Mixed-Use Development)

- Environmental impacts to proposed on-site residential uses from noises generated by proposed on-site commercial uses may result from project implementation. However, the potential impact will be mitigated to a less than significant level by the following measure:

- Wall and floor-ceiling assemblies separating commercial tenant spaces, residential units, and public places, shall have a Sound Transmission Coefficient (STC) value of at least 50, as determined in accordance with ASTM E90 and ASTM E413.

XII-180. Increased Noise Levels (Residential within 500 feet of Freeway)

- Environmental impacts to proposed residential uses from higher ambient noise levels due to being located in close proximity to a freeway. However, this impact can be reduced to a less than significant level by the following measures:
 - Wall and roof-ceiling assemblies making up the building envelope shall have an STC of at least 50, and exterior windows shall have a minimum STC of 30, as determined in accordance with ASTM E90 and ASTM E413, or any amendment thereto.

XII-200. Severe Noise Levels (Railroad)

- Environmental impacts may result from project implementation due to noise from the adjacent railroad track. However, the potential impact will be mitigated to a less than significant level by the following measures:
 - Wall and roof-ceiling assemblies making up the building envelope shall have an STC of at least 50, and exterior windows shall have a minimum STC of 30, as determined in accordance with ASTM E90 and ASTM E413, or any amendment thereto.
 - The applicant shall verify, through an acoustical engineer, that installed sound insulation is sufficient to mitigate interior noise levels below a CNEL of 45 dBA in any habitable room.

XIV-10. Public Services (Fire)

- Environmental impacts may result from project implementation due to the location of the project in an area having marginal fire protection facilities. However, this potential impact will be mitigated to a less than significant level by the following measure:
 - The following recommendations of the Fire Department relative to fire safety shall be incorporated into the building plans, which includes the submittal of a plot plan for approval by the Fire Department either prior to the recordation of a final map or the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant, and entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.

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

- Fences shall be constructed around the site to minimize trespassing, vandalism, short-cut attractions and attractive nuisances.

XIV-30. Public Services (Police)

- Environmental impacts may result from project implementation due to the location of the project in an area having marginal police services. However, this potential impact will be mitigated to a less than significant level by the following measure:
 - The plans shall incorporate the design guidelines relative to security, semi-public and private spaces, which may include but not be limited to access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the project site if needed. Please refer to "Design Out Crime Guidelines: Crime Prevention Through Environmental Design", published by the Los Angeles Police Department. Contact the Community Relations Division, located at 100 W. 1st Street, #250, Los Angeles, CA 90012; (213) 486-6000. These measures shall be approved by the Police Department prior to the issuance of building permits.

XIV-60. Public Services (Schools)

- Environmental impacts may result from project implementation due to the location of the project in an area with insufficient school capacity. However, the potential impact will be mitigated to a less than significant level by the following measure:
 - The applicant shall pay school fees to the Los Angeles Unified School District to offset the impact of additional student enrollment at schools serving the project area.

XIV-70. Public Services (Street Improvements Not Required By DOT)

- Environmental impacts may result from project implementation due to the deterioration of street quality from increased traffic generation. However, the potential impact will be mitigated to a less than significant level by the following measure:

- The project shall comply with the Bureau of Engineering's requirements for street dedications and improvements that will reduce traffic impacts in direct portion to those caused by the proposed project's implementation.

XV-10. Recreation (Increased Demand For Parks Or Recreational Facilities)

- Environmental impacts may result from project implementation due to insufficient parks and/or recreational facilities. However, the potential impact will be mitigated to a less than significant level by the following measure:
- (Subdivision) Pursuant to Section 17.12-A or 17.58 of the Los Angeles Municipal Code, the applicant shall pay the applicable Quimby fees for the construction of dwelling units.

XVI-30. Transportation (Haul Route)

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- The developer shall install appropriate traffic signs around the site to ensure pedestrian and vehicle safety.
- (Non-Hillside): Projects involving the import/export of 20,000 cubic yards or more of dirt shall obtain haul route approval by the Department of Building and Safety.

XVI-80. Transportation/Traffic

- The project will result in impacts to transportation and/or traffic systems. However, the impact can be reduced to a less than significant level through compliance with the following measure(s):
- project shall comply with clearance requirements for MetroRail per ZI 1117 and with applicable requirements per Metro Memo dated 11/8/2013.
- Project shall comply with clearance requirements for MetroRail per ZI 1117 and with applicable requirements per Metro Memo dated 11/8/2013 (attached).
- Comply with the Los Angeles Department of Transportation "Traffic Analysis for the Proposed Grand Metropolitan Mixed-Use Development Project Located at 233 Washington Boulevard," memo dated September 25, 2013, Conditions A-E.
- Any roadway widening and striping as the result of the Project mitigation shall maintain existing bicycle lanes along Olive St. and Grand Ave. and not preclude or conflict with the implementation of the 2010 Bicycle Plan in the project vicinity.

XVII-10. Utilities (Local Water Supplies - Landscaping)

- Environmental impacts may result from project implementation due to the cumulative increase in demand on the City's water supplies. However, this potential impact will be mitigated to a less than significant level by the following measures:
- The project shall comply with Ordinance No. 170,978 (Water Management Ordinance), which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g. use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season).
- In addition to the requirements of the Landscape Ordinance, the landscape plan shall incorporate the following:
- Weather-based irrigation controller with rain shutoff
- Matched precipitation (flow) rates for sprinkler heads
- Drip/microspray/subsurface irrigation where appropriate
- Minimum irrigation system distribution uniformity of 75 percent
- Proper hydro-zoning, turf minimization and use of native/drought tolerant plan materials
- Use of landscape contouring to minimize precipitation runoff
- A separate water meter (or submeter), flow sensor, and master valve shutoff shall be installed for existing and expanded irrigated landscape areas totaling 5,000 sf. and greater.

XVII-20. Utilities (Local Water Supplies - All New Construction)

- Environmental impacts may result from project implementation due to the cumulative increase in demand on the City's water supplies. However, this potential impact will be mitigated to a less than significant level by the following measures:
- If conditions dictate, the Department of Water and Power may postpone new water connections for this project until water supply capacity is adequate.
- Install high-efficiency toilets (maximum 1.28 gpf), including dual-flush water closets, and high-efficiency urinals (maximum 0.5 gpf), including no-flush or waterless urinals, in all restrooms as appropriate.
- Install restroom faucets with a maximum flow rate of 1.5 gallons per minute.

- A separate water meter (or submeter), flow sensor, and master valve shutoff shall be installed for all landscape irrigation uses.
- Single-pass cooling equipment shall be strictly prohibited from use. Prohibition of such equipment shall be indicated on the building plans and incorporated into tenant lease agreements. (Single-pass cooling refers to the use of potable water to extract heat from process equipment, e.g. vacuum pump, ice machines, by passing the water through equipment and discharging the heated water to the sanitary wastewater system.)

XVII-30. Utilities (Local Water Supplies - New Commercial or Industrial)

- Environmental impacts may result from project implementation due to the cumulative increase in demand on the City's water supplies. However, this potential impact will be mitigated to a less than significant level by the following measures:
 - All restroom faucets shall be of a self-closing design.

XVII-40. Utilities (Local Water Supplies - New Residential)

- Environmental impacts may result from project implementation due to the cumulative increase in demand on the City's water supplies. However, this potential impact will be mitigated to a less than significant level by the following measures:
 - Install no more than one showerhead per shower stall, having a flow rate no greater than 2.0 gallons per minute.
 - Install and utilize only high-efficiency clothes washers (water factor of 6.0 or less) in the project, if proposed to be provided in either individual units and/or in a common laundry room(s). If such appliance is to be furnished by a tenant, this requirement shall be incorporated into the lease agreement, and the applicant shall be responsible for ensuring compliance.
 - Install and utilize only high-efficiency Energy Star-rated dishwashers in the project, if proposed to be provided. If such appliance is to be furnished by a tenant, this requirement shall be incorporated into the lease agreement, and the applicant shall be responsible for ensuring compliance.

XVII-90. Utilities (Solid Waste Recycling)

- Environmental impacts may result from project implementation due to the creation of additional solid waste. However, this potential impact will be mitigated to a less than significant level by the following measure:
 - **(Operational)** Recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the project's regular solid waste disposal program.
 - **(Construction/Demolition)** Prior to the issuance of any demolition or construction permit, the applicant shall provide a copy of the receipt or contract from a waste disposal company providing services to the project, specifying recycled waste service(s), to the satisfaction of the Department of Building and Safety. The demolition and construction contractor(s) shall only contract for waste disposal services with a company that recycles demolition and/or construction-related wastes.
 - **(Construction/Demolition)** To facilitate on-site separation and recycling of demolition- and construction-related wastes, the contractor(s) shall provide temporary waste separation bins on-site during demolition and construction. These bins shall be emptied and the contents recycled accordingly as a part of the project's regular solid waste disposal program.

XVII-100. Utilities (Solid Waste Disposal)

- All waste shall be disposed of properly. Use appropriately labeled recycling bins to recycle demolition and construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete, bricks, metals, wood, and vegetation. Non recyclable materials/wastes shall be taken to an appropriate landfill. Toxic wastes must be discarded at a licensed regulated disposal site.

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

LEAD CITY AGENCY: City of Los Angeles	COUNCIL DISTRICT: CD 14 - JOSE HUIZAR	DATE:
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RESPONSIBLE AGENCIES: Department of City Planning

ENVIRONMENTAL CASE: ENV-2008-386-MND	RELATED CASES: CPC-2008-596-GPA-ZC-SPR, TT-72307
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PREVIOUS ACTIONS CASE NO.:	<input type="checkbox"/> Does have significant changes from previous actions. <input type="checkbox"/> Does NOT have significant changes from previous actions
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PROJECT DESCRIPTION:
GPA FROM LIGHT MANUF TO COMNTY COMM AND ZC FROM M2-2-0 TO C2-2-0 TO ALLOW 160 RES UNITS W/ 24,000 SQ FT 1ST FLOOR RETAIL, 7 STORIES, 173 SUB PARKING.

ENV PROJECT DESCRIPTION:

The proposed project is the construction of an approximately 271,119 square foot, 95 feet and 9 inch height, 7-story, mixed use building, consisting of 160 units and an approximately 24,000 square foot ground floor retail space. A total of 173 parking spaces are proposed within two complete levels of subterranean parking, with 139 parking spaces for residential use and 34 parking spaces for commercial use. The lot size is 35,096 square feet. Building and paving would cover 89% of the project site. The residential portion of the project includes a 6,740 square foot community room on the first floor (with a library and recreation room), and a 6,724 square foot common open space area on the second floor. The project includes 68 bicycle spaces for commercial use and 176 bicycle spaces for residential use.

The requested entitlements are: 1) Tentative Tract Map for a condominium subdivision and the reduction per the Advisory Agency's Parking Policy No. AA-2000-1 to allow parking reduction of .87 per dwelling unit in lieu of 2 parking space per dwelling unit and 0 guest parking spaces per unit and 2) a General Plan Amendment from Light Industrial to Community Commercial, 3) Zone Change from M2-2-0 to C2-2-0 and a Site Plan Review.

ENVIRONMENTAL SETTINGS:

The project site is a level, rectangular-shaped parcel of land, approximately 35,096 square feet in size. The project is located on north side of West Washington Blvd between Grand Avenue and Olive Street. The property addresses include 1843S S, Olive Street, 1841 S. Olive Street, 243 W. Washington Blvd., 235 W. Washington Blvd, and 233 W. Washington Blvd. The site address to be used for the land use entitlement applications will be 233 W. Washington Blvd. Washington Blvd and Grand are designated as a Major Highways. Olive Street is designated a Secondary Highway.

The site is developed with an existing surface parking lot, two pole signs and two payphones which all will be demolished/removed. The block for the proposed project is surrounded by a mix of fast food establishments, parking lots, warehouses or office buildings and many small retail uses. The surrounding buildings range from 1-2 stories however, a few are approximately 11 stories in height and located within the mix of 1-2 story buildings along Washington Blvd. Across Washington Street to the southwest of the project site is Los Angeles Trade Tech College and directly to the south is the Superior Court Traffic Division and Metropolitan Courthouse. To the west of the project is site is the Church of the Latter Day Saints. The site is within 500 feet to the Santa Monica Freeway (I-10) and adjacent to the Grand Metro Blue Line Station. There is a bus stop to the north, at the end of the block on the southeast corner of Grand Avenue and 18th street.

Approximately 28,000 cubic yards of earth is proposed for grading.

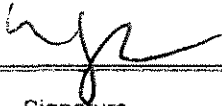
PROJECT LOCATION:
233 West Washington Blvd.

COMMUNITY PLAN AREA: SOUTHEAST LOS ANGELES STATUS: <input type="checkbox"/> Does Conform to Plan <input checked="" type="checkbox"/> Does NOT Conform to Plan	AREA PLANNING COMMISSION: SOUTH LOS ANGELES	CERTIFIED NEIGHBORHOOD COUNCIL: DOWNTOWN LOS ANGELES
EXISTING ZONING: M2-2-O	MAX. DENSITY/INTENSITY ALLOWED BY ZONING: 6:1/Unlimited Height	
GENERAL PLAN LAND USE: LIGHT MANUFACTURING	MAX. DENSITY/INTENSITY ALLOWED BY PLAN DESIGNATION: 6:1 unlimited Height	LA River Adjacent: NO
	PROPOSED PROJECT DENSITY: 1 DU/200SF	

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.



Planning Assistant

(818) 978-1197

Signature

Title

Phone

Evaluation Of Environmental Impacts:

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
 - a. Earlier Analysis Used. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
 7. Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
 8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
 9. The explanation of each issue should identify:
 - a. The significance criteria or threshold, if any, used to evaluate each question; and
 - b. The mitigation measure identified, if any, to reduce the impact to less than significance.
-

Environmental Factors Potentially Affected:

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

<input checked="" type="checkbox"/> AESTHETICS	<input type="checkbox"/> GREEN HOUSE GAS EMISSIONS	<input type="checkbox"/> POPULATION AND HOUSING
<input type="checkbox"/> AGRICULTURE AND FOREST RESOURCES	<input checked="" type="checkbox"/> HAZARDS AND HAZARDOUS MATERIALS	<input checked="" type="checkbox"/> PUBLIC SERVICES
<input checked="" type="checkbox"/> AIR QUALITY	<input type="checkbox"/> HYDROLOGY AND WATER QUALITY	<input checked="" type="checkbox"/> RECREATION
<input checked="" type="checkbox"/> BIOLOGICAL RESOURCES	<input checked="" type="checkbox"/> LAND USE AND PLANNING	<input checked="" type="checkbox"/> TRANSPORTATION/TRAFFIC
<input checked="" type="checkbox"/> CULTURAL RESOURCES	<input type="checkbox"/> MINERAL RESOURCES	<input checked="" type="checkbox"/> UTILITIES AND SERVICE SYSTEMS
<input checked="" type="checkbox"/> GEOLOGY AND SOILS	<input checked="" type="checkbox"/> NOISE	<input type="checkbox"/> MANDATORY FINDINGS OF SIGNIFICANCE

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

Background

PROPONENT NAME:
Donna Tripp

PHONE NUMBER:
(310) 838-2400

APPLICANT ADDRESS:
Craig Lawson & Co., LLC
8758 Vencie Blvd., Suite 200
Los Angeles, CA 90034

AGENCY REQUIRING CHECKLIST:
Department of City Planning

DATE SUBMITTED:
07/24/2013

PROPOSAL NAME (if Applicable):

Potentially significant impact	Potentially significant unless mitigation incorporated	Less than significant impact	No impact
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I. AESTHETICS				
a.	Have a substantial adverse effect on a scenic vista?			✓
b.	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?			✓
c.	Substantially degrade the existing visual character or quality of the site and its surroundings?	✓		
d.	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	✓		
II. AGRICULTURE AND FOREST RESOURCES				
a.	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?			✓
b.	Conflict with existing zoning for agricultural use, or a Williamson Act contract?			✓
c.	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?			✓
d.	Result in the loss of forest land or conversion of forest land to non-forest use?			✓
e.	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?			✓
III. AIR QUALITY				
a.	Conflict with or obstruct implementation of the applicable air quality plan?		✓	
b.	Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	✓		
c.	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)?		✓	
d.	Expose sensitive receptors to substantial pollutant concentrations?	✓		
e.	Create objectionable odors affecting a substantial number of people?		✓	
IV. BIOLOGICAL RESOURCES				
a.	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?			✓
b.	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?			✓
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?			✓
d.	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?			✓
e.	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	✓		
f.	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?			✓
V. CULTURAL RESOURCES				

Potentially significant impact	Potentially significant unless mitigation incorporated	Less than significant impact	No impact
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a.	Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?				✓
b.	Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?		✓		
c.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		✓		
d.	Disturb any human remains, including those interred outside of formal cemeteries?		✓		

VI. GEOLOGY AND SOILS

a.	Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.		✓		
b.	Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Strong seismic ground shaking?		✓		
c.	Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Seismic-related ground failure, including liquefaction?		✓		
d.	Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Landslides?				✓
e.	Result in substantial soil erosion or the loss of topsoil?		✓		
f.	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?		✓		
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?			✓	
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?				✓

VII. GREEN HOUSE GAS EMISSIONS

a.	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			✓	
b.	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			✓	

VIII. HAZARDS AND HAZARDOUS MATERIALS

a.	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?		✓		
b.	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?		✓		
c.	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			✓	
d.	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?			✓	
e.	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?				✓
f.	For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?				✓
g.	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			✓	

Potentially significant impact	Potentially significant unless mitigation incorporated	Less than significant impact	No impact
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h.	Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?				✓
IX. HYDROLOGY AND WATER QUALITY					
a.	Violate any water quality standards or waste discharge requirements?			✓	
b.	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 preexisting nearby wells would drop to a level which would not support existing land uses or planned 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 off-site?			✓	
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 off-site?				✓
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?			✓	
f.	Otherwise substantially degrade water quality?			✓	
g.	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?				✓
h.	Place within a 100-year flood hazard area structures which would impede or redirect flood flows?				✓
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?			✓	
j.	Inundation by seiche, tsunami, or mudflow?				✓
X. LAND USE AND PLANNING					
a.	Physically divide an established community?				✓
b.	Conflict with any 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?		✓		
c.	Conflict with any applicable habitat conservation plan or natural community conservation plan?				✓
XI. MINERAL RESOURCES					
a.	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?			✓	
b.	Result in the loss of availability of a locally important mineral resource' recovery site delineated on a local general plan, specific plan or other land use plan?				✓
XII. NOISE					
a.	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?		✓		
b.	Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?			✓	
c.	A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?			✓	
d.	A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?			✓	

Potentially significant impact	Potentially significant unless mitigation incorporated	Less than significant impact	No impact
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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?				✓
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?				✓

XIII. POPULATION AND HOUSING

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)?		✓		
b.	Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				✓
c.	Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?				✓

XIV. PUBLIC SERVICES

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: Fire protection?		✓		
b.	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: Police protection?		✓		
c.	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: Schools?		✓		
d.	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: Parks?		✓		
e.	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: Other public facilities?		✓		

XV. RECREATION

a.	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?		✓		
b.	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				✓

XVI. TRANSPORTATION/TRAFFIC

a.	Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?		✓		
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Potentially significant impact	Potentially significant unless mitigation incorporated	Less than significant impact	No impact
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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?		✓	
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?			✓
d.	Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	✓		
e.	Result in inadequate emergency access?	✓		
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 supporting alternative transportation (e.g., bus turnouts, bicycle racks)?		✓	
XVII. UTILITIES AND SERVICE SYSTEMS				
a.	Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?		✓	
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?	✓		
c.	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?			✓
d.	Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	✓		
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?		✓	
f.	Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	✓		
g.	Comply with federal, state, and local statutes and regulations related to solid waste?	✓		
XVIII. MANDATORY FINDINGS OF SIGNIFICANCE				
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?		✓	
b.	Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?		✓	
c.	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?		✓	

Note: Authority cited: Sections 21083, 21083.05, Public Resources Code. Reference: Section 65088.4, Gov. Code; Sections 21080, 21083.05, 21095, Pub. Resources Code; *Eureka Citizens for Responsible Govt. v. City of Eureka* (2007) 147 Cal.App.4th 357; *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th at 1109; *San Franciscans Upholding the Downtown Plan v. City and County of San Francisco* (2002) 102 Cal.App.4th 656.

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

The Environmental Impact Assessment includes the use of official City of Los Angeles and other government source reference materials related to various environmental impact categories (e.g., Hydrology, Air Quality, Biology, Cultural Resources, etc.). The State of California, Department of Conservation, Division of Mines and Geology - Seismic Hazard Maps and reports, are used to identify potential future significant seismic events; including probable magnitudes, liquefaction, and landslide hazards. Based on applicant information provided in the Master Land Use Application and Environmental Assessment Form, impact evaluations were based on stated facts contained therein, including but not limited to, reference materials indicated above, field investigation of the project site, and any other reliable reference materials known at the time.

Project specific impacts were evaluated based on all relevant facts indicated in the Environmental Assessment Form and expressed through the applicant's project description and supportive materials. Both the Initial Study Checklist and Checklist Explanations, in conjunction with the City of Los Angeles's Adopted Thresholds Guide and CEQA Guidelines, were used to reach reasonable conclusions on environmental impacts as mandated under the California Environmental Quality Act (CEQA).

The project as identified in the project description may cause potentially significant impacts on the environment without mitigation. Therefore, this environmental analysis concludes that a Mitigated Negative Declaration shall be issued to avoid and mitigate all potential adverse impacts on the environment by the imposition of mitigation measures and/or conditions contained and expressed in this document; the environmental case file known as **ENV-2008-386-MND** and the associated case(s), **CPC-2008-596-GPA-ZC-SPR, TT-72307**. Finally, based on the fact that these impacts can be feasibly mitigated to less than significant, and based on the findings and thresholds for Mandatory Findings of Significance as described in the California Environmental Quality Act, section 15065, the overall project impact(s) on the environment (after mitigation) will not:

- Substantially degrade environmental quality.
- Substantially reduce fish or wildlife habitat.
- Cause a fish or wildlife habitat to drop below self sustaining levels.
- Threaten to eliminate a plant or animal community.
- Reduce number, or restrict range of a rare, threatened, or endangered species.
- Eliminate important examples of major periods of California history or prehistory.
- Achieve short-term goals to the disadvantage of long-term goals.
- Result in environmental effects that are individually limited but cumulatively considerable.
- Result in environmental effects that will cause substantial adverse effects on human beings.

ADDITIONAL INFORMATION:

All supporting documents and references are contained in the Environmental Case File referenced above and may be viewed in the EIR Unit, Room 763, City Hall.

For City information, addresses and phone numbers: visit the City's website at <http://www.lacity.org>; City Planning - and Zoning Information Mapping Automated System (ZIMAS) cityplanning.lacity.org/ or EIR Unit, City Hall, 200 N Spring Street, Room 763. Seismic Hazard Maps - <http://gmw.consrv.ca.gov/shmp/> Engineering/Infrastructure/Topographic Maps/Parcel Information - <http://boemaps.eng.ci.la.ca.us/index01.htm> or City's main website under the heading "Navigate LA".

PREPARED BY:	TITLE:	TELEPHONE NO.:	DATE:
ONDREA TYE	Planning Assistant	(818) 978-1197	05/16/2014

Impact?	Explanation	Mitigation Measures
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APPENDIX A: ENVIRONMENTAL IMPACTS EXPLANATION TABLE

I. AESTHETICS		
a.	NO IMPACT	The project is not located in or near a scenic vista, therefore it will not have an adverse effect on a scenic vista.
b.	NO IMPACT	The project is not located on a designated scenic highway. Additionally, the project site does not contain any scenic resources or locally-recognized historic buildings. No impact would result.
c.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	<p>The proposed project is the construction of an in-fill mixed-use residential/commercial use. Existing development in the immediate area includes a mix of retail, office, surface parking, light-industrial and educational uses. The project is in conformance with the Citywide Urban Design guidelines for mixed-use development and will be conditioned to meet City requirements for graffiti removal and site maintenance. Signage on the site will conform to the requirements of the LAMC. Therefore the project would be consistent with the general character of the surrounding area.</p>
d.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	<p>The project has been conditioned so that lighting will be wall mounted or ground mounted and would be directed downward and shielded away from adjacent uses. Wall mounted security lighting will remain lit all night at each entrance and/or exit, but would be designed to prevent glare onto adjacent residential properties. Furthermore, the majority of lighting associated with the proposed project will be directed internal to the project site itself, away from neighboring land uses. The exterior portions of the proposed building will utilize various non-reflective materials</p>
II. AGRICULTURE AND FOREST RESOURCES		
a.	NO IMPACT	The subject site does not contain any type of farmland and is not currently zoned for agricultural uses. As a result, no impacts would occur.
b.	NO IMPACT	The subject site is not zoned for agricultural uses and does not conflict with any Williamson Act contract. As a result there would be no impacts.

Impact?	Explanation	Mitigation Measures
c.	NO IMPACT	
d.	NO IMPACT	
e.	NO IMPACT	
III. AIR QUALITY		
a.	LESS THAN SIGNIFICANT IMPACT	
b.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	<p>The project consists of a 160 unit condo building with ground floor commercial and would not result in a potentially significant air quality impact or conflict with or obstruct implementation of the Southern California Air Quality Management District or Congestion Management Plan (SCAQMD).</p>
		<p>The proposed project consists of the construction of approximately 200,000 square feet of building area. The mass daily emissions generated by project construction and operational activities would not exceed the thresholds of significance recommended by the SCAQMD. However, construction activities could increase dust and pollution levels temporarily. The project is required to comply with the requirements of SCAQMD Rule 403, Fugitive Dust, which requires the implementation of reasonably available control measures for all fugitive dust sources.</p>
III-10		
c.	LESS THAN SIGNIFICANT IMPACT	
d.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	<p>The mass daily and localized emissions generated by project construction and operational activities would not exceed the thresholds of significance recommended by the SCAQMD. Therefore, the proposed project would not contribute a cumulatively considerable increase in emissions for the pollutants for which the basin is in nonattainment. The cumulative air quality impacts associated with the proposed project would be less than significant.</p>
		<p>Impacts from construction of the project could temporarily affect nearby residents. However, the Mitigation Measures will reduce impacts to a less than significant level.</p>
See conditon III-10		

Impact?	Explanation	Mitigation Measures
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e.	LESS THAN SIGNIFICANT IMPACT	The proposed project involves the construction and operation of a new mixed-use residential and commercial building, which is not typically associated with the creation of off-site odor complaints. As the proposed project involves no elements related to industrial projects, no objectionable odors are anticipated. Therefore, the potential operational impacts associated with objectionable odors would be less than significant.	
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IV. BIOLOGICAL RESOURCES

a.	NO IMPACT	The subject site is not identified as a biological resource area. The subject site is currently utilized as a parking lot, located in an urbanized area that does not support any known protected or special-status species.	
b.	NO IMPACT	The project site is located in an urbanized area and is not located in a significant ecological area (sea) as designated by the city of Los Angeles and does not support any significant riparian or special status habitats. There would be no impact.	
c.	NO IMPACT	The site does not contain any federally protected wetlands.	
d.	NO IMPACT	The project site is located in an urbanized area that does not support any known wildlife corridor or designated migration path.	
e.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	The project site is developed with a surface parking lot and does not contain protected tree species. Significant trees (8	IV-70, IV-80, IV-90
f.	NO IMPACT	The project is not located in a significant ecological area or near an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan. There would be no impact.	

V. CULTURAL RESOURCES

a.	NO IMPACT	The subject site is not identified as having any historical resources.	
b.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	Environmental impacts could result from project implementation due to discovery of deeper lying archaeological resources. However, the potential impacts would be reduced to a less-than-significant level through the implementation of proposed mitigation measures.	V-20

Impact?	Explanation	Mitigation Measures
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c.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	While no unique geologic features are located on the site, construction of the proposed project may result in deeper excavations than previously performed. Any encounter with a potential paleontological resource or geologic feature during project construction would necessitate compliance with the proposed mitigation measures.	V-20
d.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	A significant adverse impact could occur if grading or excavation activities associated with the project were to disturb previously interred human remains. Implementation with the proposed mitigation measures would reduce the impact to less than significant.	V-20

VI. GEOLOGY AND SOILS

a.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	According to ZIMAS the project is not located within an Alquist-Priolo earthquake fault zone, however it is located 7 meters from the Puente Hills Blind Thrust . As with all projects in southern California, the project is located in an area known to have seismic activity, the project would be required to comply with all applicable Los Angeles and California building codes with respect to seismic hazards. With adherence to applicable codes, impacts would be less than significant.	VI-10
b.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	As with all projects in southern California, the project is located in an area known to have seismic activity, the project would be required to comply with all applicable Los Angeles and California building codes with respect to seismic hazards. With adherence to applicable codes, impacts would be less than significant.	VI-10 Following the building code and grading requirements will reduce seismic risks.
c.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	The project site is not located in a city-designated liquefaction hazards zone. As no groundwater was encountered during borings drilled to a maximum depth of 50 feet the soils underlying the site would not be capable of liquefaction during an earthquake. To ensure that geology and soil impacts regarding soil stability and expansive soils as a result of construction of the proposed building, including the subterranean parking garage, are reduced to the maximum extent practicable, mitigation measure vi-50 shall be	VI-50

Impact?	Explanation	Mitigation Measures	
		implemented. Therefore, impacts with respect to potential liquefaction would be less than significant.	
d.	NO IMPACT	The project site is not located within a landslide area.	
e.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	The applicant has indicated that 28,000 cubic yards of soil are to be moved, and the project will have an effect on the site's topsoil, but these effects are anticipated to be less than significant. The project is required to obtain a Soils Approval Letter from Building and Safety.	VI-10, VI-50
f.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	The subject site is located in an area prone to liquefaction. The project will be required to comply with the requirements listed in the Geology Technical Report and Building Codes, therefore, with appropriate mitigation measures the impacts will be less than significant.	VI-20
g.	LESS THAN SIGNIFICANT IMPACT	Construction of the project would be required to comply with seismic building codes, as site-specific as appropriate, to minimize risks posed by expansive soils.	
h.	NO IMPACT	The proposed project does not involve septic tanks and would be served by the existing city sewer infrastructure. there would be no impact.	
VII. GREEN HOUSE GAS EMISSIONS			
a.	LESS THAN SIGNIFICANT IMPACT	The proposed project would be subject to the energy efficiency requirements of the new title 24 Cal green codes and the city of Los Angeles green building ordinance. Based on this information, the proposed project would not conflict with an applicable plan, policy or regulation for the purpose of reducing the emissions of GHGS. The impact of the proposed project would be less than significant.	
b.	LESS THAN SIGNIFICANT IMPACT	The proposed project would be subject to the energy efficiency requirements of the new title 24 Cal green codes and the city of Los Angeles green building ordinance. Based on this information, the proposed project would not conflict with an applicable plan, policy or regulation for the purpose of reducing the emissions of GHGS. The impact of the proposed project would be less than significant.	
VIII. HAZARDS AND HAZARDOUS MATERIALS			

Impact?	Explanation	Mitigation Measures	
a.	<p>POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED</p>	<p>Project construction activities would result in a temporary increase in the use of typical construction materials at the site, including concrete, hydraulic fluids, paints, cleaning materials, and vehicle fuels. The use of these materials during project construction would be short-term in nature and would occur in accordance with standard construction practices and applicable federal, state and local regulations. Similarly, project operations would utilize minimal amounts of hazardous materials for routine cleaning and maintenance. As with project construction, all hazardous materials would be contained, stored, and used in accordance with manufacturer guidelines and applicable regulations. Implementation of mitigation measure would ensure that hazardous materials impacts during construction and operation of the proposed project are reduced to the maximum extent feasible and a less than significant impact would occur.</p>	VIII-90
b.	<p>POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED</p>	<p>A search of federal, state, tribal and local databases containing known and suspected sites of environmental contamination was conducted. The project site was not identified in any of the databases. The proposed project is located in a methane zone. Project development would occur in accordance with the Los Angeles building code requirements pertaining to methane zones. With implementation of methane gas mitigation measures, project impacts associated with hazards and hazardous materials would be less than significant.</p>	VIII-20
c.	<p>LESS THAN SIGNIFICANT IMPACT</p>	<p>The proposed project is a mixed (residential/commercial) use building and is not located within a quarter mile of any public schools. The nearest school is San Pedro Elementary which is .7 mile from the subject site. Los Angeles Trade Technical college is located directly southwest of the project site. The project would use minimal amounts of hazardous materials for routine cleaning and therefore would not pose any substantial potential for accident conditions involving the release of hazardous materials. The impact of the proposed project would be</p>	

Impact?	Explanation	Mitigation Measures
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		less than significant.	
d.	LESS THAN SIGNIFICANT IMPACT	The proposed project is a mixed use residential condo over ground floor commercial and is not expected to create hazards to the public.	
e.	NO IMPACT	The project is not located within an airport land use plan or within two miles of a public airport or public use airport. There would be no impact.	
f.	NO IMPACT	The project is not located within the vicinity of a private airstrip. There would be no impact.	
g.	LESS THAN SIGNIFICANT IMPACT	The project is not located along a designated emergency disaster route. Additionally, the project would not result in significant traffic impacts. Therefore, project implementation would not impair or physically interfere with an adopted emergency response plan. The impact of the proposed project would be less than significant.	
h.	NO IMPACT	The project is not located where wildlands are adjacent or where residences are intermixed with wildlands. There would be no impact.	

IX. HYDROLOGY AND WATER QUALITY

a.	LESS THAN SIGNIFICANT IMPACT	The proposed project does not include any point-source discharges. Project construction would involve ground-disturbing activities, such as the excavation, foundation construction, and the installation of utilities that would expose soils for a limited time. The project will comply with stormwater pollution control Best Management Practices (BMP) and the LID (Low Impact Development) regulations enacted in Section 64.72 of Article 4.4 of Chapter VI of the Los Angeles Municipal Code to ensure that pollution levels in stormwater discharge will comply with applicable water quality standards. Therefore, it is not anticipated to violate any water quality or waste discharge requirements.	
b.	LESS THAN SIGNIFICANT IMPACT	The geotechnical report concluded that no groundwater was encountered in borings drilled to a maximum depth of 50 feet. The project will not substantially deplete groundwater supplies or interfere with groundwater recharge. Less than significant impact would occur. The project will be required to conform to applicable stormwater pollution control BMPs with the LID (Low Impact Development) regulations enacted in Section 64.72 of	

Impact?	Explanation	Mitigation Measures
		Article 4.4 of Chapter VI of the Los Angeles Municipal Code.
c.	LESS THAN SIGNIFICANT IMPACT	The project site is fully paved. Therefore, the proposed project would not increase the amount of impervious surface area on the project site through development and all the runoff associated with the
		proposed project would be either directed to landscaped areas or directed to the existing storm drain system and would not encounter unprotected soils. The proposed project would include a drainage system with pipes that would adequately convey surface water runoff into the existing storm drain that is currently in Washington Boulevard.
d.	NO IMPACT	The project site is located in a highly urbanized area and is served by existing city storm drain infrastructure. Under existing conditions, the site is entirely covered by impervious surfaces. This condition would not change under the proposed project. The project site is not located adjacent to any stream or river and project runoff would continue to drain into existing city storm drain infrastructure. Therefore, the project would not substantially alter existing drainage patterns of the site or surrounding area in a manner which would result in flooding. Furthermore, the project is subject to the Low Impact Development Ordinance . No impact would result.
e.	LESS THAN SIGNIFICANT IMPACT	There are no known current deficiencies in the local storm water system. The storm drain system can adequately handle existing flows. Project development is not anticipated to result in runoff conditions that would exceed the capacity of the local storm drain system. The project will follow the the regulations of with the Low Impact Development Ordinance, will be a less than significant impacts.
f.	LESS THAN SIGNIFICANT IMPACT	The project is presently a parking lot that is completely paved and impervious and the proposed complete project will not change the amount of impervious layer or lead to substantial degradation of water quality. However, combined with the Low Impact Development Ordinance requirments, the impacts will be a less than significant.

Impact?	Explanation	Mitigation Measures
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g.	NO IMPACT	The proposed project is not located within a 100-year flood plain or within a flood zone. Therefore, the proposed project would not place housing within a 100-year flood hazard area and no impact would occur.	
h.	NO IMPACT	The proposed project is not located within a 100-year flood plain or within a flood zone. The proposed project is located in a highly urbanized area and would not have the potential to impede or redirect floodwater flows. No impact would occur.	
i.	LESS THAN SIGNIFICANT IMPACT	According to the safety element of the city of Los Angeles general plan and ZIMAS parcel profile, the project site lies within a potential inundation area. However, the project site is also located in an area that is fully urbanized and is designated as having a low flooding potential. Therefore, impacts associated with flooding, including flooding due to the failure of a levee or dam would be less than significant.	
j.	NO IMPACT	The project site is not located in a coastal area; therefore, tsunamis are not considered a hazard at this site. No impact would occur.	

X. LAND USE AND PLANNING

a.	NO IMPACT	The project is located within an existing urban area and is surrounded by an established street grid system. The project would not physically divide an established community. The project would not create a conflict of scale, intensity, or use that would serve as a physical division. Since the project would not physically disrupt or divide the surrounding established community, no impact would occur.	
b.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	The requested General Plan Amendment (and associated ZC) from Limited Industrial to Community Commercial will alter the use (intensity) of the subject site and permit increased residential density. Additionally, the site is located in the Greater Downtown Housing Incentive area which permits unlimited residential density (FAR limitations only) in order to support development of residential dwelling units. However, application of the required Conditions of Approval (inclusive of the subject Environmental Mitigation Measures) will reduce potentially significant	X-10

Impact?	Explanation	Mitigation Measures
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		impacts associated with the affected impact categories identified herein, to a level of insignificance.	
c.	NO IMPACT	There are no habitat conservation plans or natural community conservation plans applicable to the project site or project area. Implementation of the proposed project would not conflict with any habitat conservation or natural community conservation plan. no impact would occur.	

XI. MINERAL RESOURCES

a.	LESS THAN SIGNIFICANT IMPACT	The project site is not located within the boundaries or an identified oil field. No active oil wells or abandoned oil wells are known to be located on-site. However, it is located within immediate proximity to the state-designated boundaries of the Los Angeles downtown oil field. The project site is not located within a city-designated mineral resource zone where significant mineral deposits are known to be present nor within a mineral production area as classified by the California Geological survey. No mineral extraction operations currently occur or have occurred on the site. Therefore, less than significant impacts would occur with implementation of the proposed project.	
b.	NO IMPACT	No mineral resource of local importance is known to be present on the site. The project site is not located in an area containing significant mineral deposits. Therefore, development of the proposed project would not result in the loss of availability of a mineral resource that would be of value to the residents of the state or a locally-important mineral resource, or mineral resource recovery site, as delineated on a local general plan, specific plan, or land use plan. Thus, no impact associated with mineral resources would occur.	

XII. NOISE

a.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	Adjacent uses would be subject to a temporary increase in noise levels during the construction phase due to the heavy construction equipment and related construction activity. The duration of construction activities expected to be short-term. Construction/demolition hours will be limited to 7 AM to 9 PM – Monday through Friday, 8 AM to 6 PM on Saturdays or National Holidays, and no work permitted on Sundays. Therefore, the corresponding noise will be	XII-20, XII-40, XII-60, XII-180, XII-200
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Impact?	Explanation	Mitigation Measures	
	<p>minimized, and should reduce any potentially significant impacts related to construction activity to less than significant. In addition the proposed project, a mixed use residential and office/retail development, includes a residential portion (a noise sensitive receptor) that may be impacted by the noise from vehicular traffic from the close proximity of the site to the adjacent freeway and particularly to the Grand Station Metro Blue Line Light rail. The proposed sound mitigation measures should reduce the potential on-site and construction impacts to a less-than-significant level.</p>		
b.	<p>LESS THAN SIGNIFICANT IMPACT</p>	<p>The maximum vibration level of 0.089 inches per second would be below the thresholds of significance for both potential building damage and human annoyance. The proposed project does not include uses (retail/residential) that are expected to generate measurable levels of ground-borne vibration during operation. Therefore, the noise and vibration levels are anticipated to be less than significant.</p>	
c.	<p>LESS THAN SIGNIFICANT IMPACT</p>	<p>The proposed mixed use project will be located on an infill site in a fully urbanized area. There are also no sensitive receptors in close proximity to the project site that would be affected by noise emanating from the project site. Therefore, operation of the proposed project would not generate a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project. The impact of the proposed project would be less than significant.</p>	
d.	<p>LESS THAN SIGNIFICANT IMPACT</p>	<p>The maximum daytime noise levels generated by the project would be less than 5 DBA above the existing average daytime noise levels in the immediate area, however, a substantial temporary increase in ambient noise levels would not occur during construction of the proposed project. The short-term construction-related impact of the proposed project would be less than significant. However, the mitigation measures contained herein will ensure that the impact will be less than significant.</p>	

Impact?	Explanation	Mitigation Measures	
e.	NO IMPACT	The project site is not located within an airport land use plan area or within two miles of a public airport or public use airport. Therefore, construction and operation of the project would not expose people to excessive airport related noise levels. no impact would occur.	
f.	NO IMPACT	The project site is not located in the vicinity of a private airstrip and would therefore not subject area residents to substantial noise levels from aircraft operations.	
XIII. POPULATION AND HOUSING			
a.	LESS THAN SIGNIFICANT IMPACT	The proposed project involves the development of 160 dwelling units and 23,770 square feet commercial area is would not be considered a substantial increase for the area and is within the anticipated SCAG forecast for population in the area. In additon, the proposed project would not require the extension of roadway or other infrastruact (i.e., water, sewer facilities, etc) into undeveloped areas. As such, population growth and housing associated with the proposed project would be less than significant.	
b.	NO IMPACT	The project site is developed with a surface parking lot and would not displace existing residents. The project would add to the City's housing supply. No impact would occur.	
c.	NO IMPACT	The project would result in an increase of up to 160 dwelling units within the community plan area, and as such, the proposed project would increase housing stock in the community plan area. the existing site is vacant, and therefore, would not displace people or necessitate the construction of replacement housing elsewhere. No impact would occur.	
XIV. PUBLIC SERVICES			
a.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	The proposed project would be within a 0.75-mile response distance for an engine company and 1.0-mile response distance for a truck company, and will provide adequate fire flow and access, and meet building fire safety regulations, impacts with respect to fire services. However, the proposed 160 dwelling units and 23,000 square feet of new commercial construction may increase fire protection needs in the project area but will be less than significant with the implementation of mitigation	XIV-10

Impact?	Explanation	Mitigation Measures
		measures contained in XIV-10.
b.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	By increasing the density and intensity of use on the site, the project may result in increased demand for police services. With implementation of the proposed mitigation measures, the proposed project's impact would be reduced to a less-than-significant level. The proposed project would also be subject to LAPD review and would be required to comply with all applicable safety requirements of the LAPD and the city of Los Angeles in order to adequately address police protection service demands.
c.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	The project's 160 new units could place additional demands on the LAUSD. Pursuant to the California Government Code Section 17620, payment of the school fees established by the LAUSD in accordance with existing rules and regulations regarding the calculation and payment of such fees, would, by law, mitigate the proposed project's direct and indirect impacts on schools. Therefore, impacts on the schools identified to serve the proposed project would be less than significant.
d.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	The project involves the construction of 160 dwelling units within the Southeast Los Angeles Community Plan area where parks and recreation facilities are needed. However, this impact will be reduced to a less than significant level by the payment of dwelling unit construction tax fees for construction of apartment complexes.
e.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	Roadway improvements and/or dedications may be required by the Bureau of Engineering as part of the project approval process.
XV. RECREATION		
a.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	The proposed project will result in an increase in the use of parks. However, this impact will be reduced to a less than significant level by implementation of mitigation measures.
b.	NO IMPACT	The project is not currently proposing the construction or expansion of public recreational facilities. The project site will include private open space and on-site recreational facilities that will meet the open space requirements of the city.

Impact?	Explanation	Mitigation Measures
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Impacts would be less than significant.

XVI. TRANSPORTATION/TRAFFIC

a.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	<p>The Los Angeles Department of Transportation estimates the project will generate a net increase of approximately 1,764 daily trips, 81 trips during the am peak hour and 160 trips during the pm peak hour. The traffic impacts associated with the construction activities will be significant. The following mitigations are derived from DOT's Traffic Analysis for the proposed project, including a work area traffic control plan, a designated haul route, staging area, and traffic control procedures to mitigate the traffic impacts during construction. Since the project is within 100 feet of the blueline station, the project shall comply with construction requirements of the Metro Transportation Authority (MTA). With the implemenetaion of the mitigation measures, the impacts related to the construction would be at a level of insignificance.</p>	XVI-80
b.	LESS THAN SIGNIFICANT IMPACT	<p>Project peak hour generarion is less than 150 VPH (directional per CMP), therefore, the Project does not trigger a need for a detailed freeway analysis. In additon, local Congestion Management Plan (CMP) montitoring for the attached intersectdions shows project volumes below analysis thresholds.</p>	
c.	NO IMPACT	<p>The proposed project is not located within an airport hazard zone, airport land use plan, or within two miles of a public airport or public use airport. No impact would occur.</p>	
d.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	<p>Vehicular and bicycle traffic would access the parking structure via a full-access driveway that would intersect olive street approximately 200 feet north of Washington Boulevard. Driveway location and design will be subject to LADOT approval at the time of building permit issuance which will ensure that city standards regarding sight lines and turning movements that provide for safe access for the project and surrounding uses are implemented. The safety of pedestrians and vehicles would be ensured by an approved haul route plan and use of traffic signs and fencing during construction. Mitigation</p>	XVI-30, XVI-80

Impact?	Explanation	Mitigation Measures
	measures related to construction design and access will be implemented to ensure that impacts would be less than significant.	
e. POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	Emergency access to the project site would be provided by the existing and proposed street system. The proposed project would be subject to the site plan review requirements of the LAFD and the LAPD to ensure that all access roads, driveways and parking areas would remain accessible to emergency service vehicles. Impacts would be reduced to less than significant.	XVI-80
	The proposed project would be subject to the site plan review requirements of the LAFD and the LAPD to ensure that all access roads, driveways and parking areas would remain accessible to emergency service vehicles. Impacts would be reduced to less than significant.	
f. LESS THAN SIGNIFICANT IMPACT	The 2010 Bicycle Plan indicates a proposed Class II bike lane along Washington Blvd, adjacent to the project. The Metro Blue Station is adjacent to the project along with multiple bus lines which will accommodate the residents of the project. Therefore, the impacts would be less than significant.	
XVII. UTILITIES AND SERVICE SYSTEMS		
a. LESS THAN SIGNIFICANT IMPACT	The proposed project would convey wastewater via municipal sewage infrastructure maintained by the Department of Public Works Bureau of Sanitation, and is subject to the state's wastewater treatment requirements. As such, wastewater from the implementation of the proposed project at the project site would be treated according to the wastewater treatment requirements enforced by the Los Angeles Regional Water Control Board, and impacts would be less than significant.	
b. POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	Based on the estimated wastewater generation of 30,994 GPD it is reasonable to assume that the existing sewer lines have excess capacity and would thus be able to accommodate the additional flow. The city will require detailed gauging and evaluation of the proposed project's wastewater connection point at the time of connection to the system. If deficiencies are identified at that time, the applicant would be required, at its own cost, to build secondary sewer lines to a connection point in the sewer system with sufficient capacity, in accordance with standard city procedures. The installation of any such secondary lines, if needed, would require minimal trenching and pipeline	XVII-20, XVII-30, XVII-40

Impact?	Explanation	Mitigation Measures
	installation, which would be a temporary action and would not result in any adverse environmental impacts. As such, no new or expanded wastewater infrastructure would be required to serve the proposed project and impacts would be less than significant.	
c. NO IMPACT	There are no known deficiencies in the local storm water system and runoff from the site would not exceed the capacity of existing or planned storm water drainage systems. No impact would occur.	
d. POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	The Department of Water and Power's most recent urban water management plan indicates that a sufficient water supply is expected to be available to serve the project. Therefore, sufficient water supplies would be available to serve the project from existing entitlements and resources, and new or expanded entitlements would not be necessary. Implementation of mitigation measures related to water conservation would ensure that impacts are less than significant.	XVII-10
e. LESS THAN SIGNIFICANT IMPACT	The project's projected wastewater generation represents only a negligible percentage of the capacity available and would not require construction of new facilities. Impacts would be less than significant.	
f. POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	Existing landfills in Los Angeles County have the capacity to serve the proposed project. Nevertheless, implementation of mitigation measures related to solid waste recycling would ensure that solid waste impacts remain less-than-significant.	XVII-90
g. POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	This increase in solid waste per day is modest and would be handled by a local existing waste collection service. Additionally, the amount is minimal compared to daily capacities of nearby recycling or disposal facilities and transfer stations and these modest amounts would be further reduced through source reduction and recycling programs (as required by AB 939) and the implementation of the subject mitigation measure as stated above. Furthermore, the proposed project would not conflict with solid waste policies or objectives that are required by law, statute, or regulation. Nevertheless, implementation of	XVII-100

Impact?	Explanation	Mitigation Measures
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		mitigation measures related to solid wastewould ensure that solid waste impacts remain less-than-significant.	
XVIII. MANDATORY FINDINGS OF SIGNIFICANCE			
a.	LESS THAN SIGNIFICANT IMPACT	The proposed project is located in a densely populated urban area and would have no unmitigated significant impacts with respect to biological resources or cultural resources. The proposed project would not degrade the quality of the environment, reduce or threaten any fish or wildlife species (endangered or otherwise), or eliminate important examples of the major periods of California history or pre-history. Therefore, no impact would occur.	
b.	LESS THAN SIGNIFICANT IMPACT	As concluded in this analysis, the proposed project's contribution to cumulative impacts related to aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, geology/soils, greenhouse gas emissions, hazards/hazardous materials, hydrology/water quality, land use/planning, mineral resources, noise, population/housing, public services, recreation, transportation/traffic, and utilities would be less than significant. As such, the proposed project's contribution to cumulative impacts would be less than significant.	
c.	LESS THAN SIGNIFICANT IMPACT	With implementation of the recommended mitigation measures, the proposed project will not result in any unmitigated significant impacts. With the application of the foregoing mitigations, the project would not have the potential to result in substantial adverse effects on human beings and therefore would be less than significant.	

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

233 W. Washington Bl
 DOT Case No. CEN 13-41182

Date: September 25, 2013

To: Karen Hoo, City Planner
 Department of City Planning

From: 
 Tomas Carranza, Senior Transportation Engineer
 Department of Transportation

Subject: **TRAFFIC ANALYSIS FOR THE PROPOSED GRAND METROPOLITAN
 MIXED-USE DEVELOPMENT PROJECT LOCATED AT 233 WEST
 WASHINGTON BOULEVARD**

The Department of Transportation (DOT) has reviewed the traffic analysis prepared by Crain and Associates, dated August 2013, for the proposed mixed-use development project located on the northeast corner of Grand Avenue and Washington Boulevard. Based on DOT's traffic impact criteria¹, the traffic study included the analysis of twelve intersections and determined that none of the study intersections would be significantly impacted by project-related traffic. The results of the traffic analysis, which adequately evaluated the project's traffic impacts on the surrounding community, are summarized in **Attachment 1**.

DISCUSSION AND FINDINGS

A. Project Description

The project proposes to construct 160 apartment units and a 24,000 square-foot of retail use on a site that is currently a surface parking lot. The number of parking spaces to be provided by the project was not disclosed in the traffic study. Vehicular access will be provided via a two-way driveway on Olive Street. The project is expected to be completed by 2017.

B. Trip Generation

The project is estimated to generate a net increase of approximately 1,764 daily trips, 81 trips during the a.m. peak hour and 160 trips during the p.m. peak hour. These estimates were derived using trip generation rates from the Institute of Transportation Engineers (ITE) "Trip Generation Handbook, 9th Edition." DOT's traffic study guidelines allow projects to reduce their total trip generation to account for potential transit usage to and from the site, and for the internal-trip making opportunities that are afforded by mixed-use projects. Consistent with these guidelines, the estimated trip generation includes trip credits to account for the mixed-use nature of the project and for the expected transit mode share. A copy of the trip generation table from the traffic study can be found in **Attachment 2**.

¹ Per DOT's Traffic Study Policies and Procedures, a significant impact is identified as an increase in the Critical Movement Analysis (CMA) value, due to project related traffic, of 0.01 or more when the final ("with project") Level of Service (LOS) is LOS E or F; an increase of 0.020 or more when the final LOS is LOS D; or an increase of 0.040 or more when the final LOS is LOS C.

PROJECT REQUIREMENTS

A. Construction Impacts

DOT recommends that a construction work site traffic control plan be submitted to DOT for review and approval prior to the start of any construction work. The plan should show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. DOT also recommends that all construction related traffic be restricted to off-peak hours.

B. Highway Dedication And Street Widening Requirements

Highway dedication and widening may be required along the streets that front the proposed project. Along the project's frontage, **Washington Boulevard** is classified as a Major Highway Class II which requires a 40-foot half-width roadway on a 52-foot half-width right-of-way and **Olive Street** is classified as a Secondary Highway requiring a 35-foot half-width roadway within a 45-foot half-width right-of-way.

It should be noted that, per Council File No. 10-1755, it is recommended that **Grand Avenue** be redesignated to a Modified Major Highway Class II to maintain the existing roadway width of 56-feet and to accommodate a minimum 12-foot wide sidewalk/parkway on each side. This new designation and roadway standard for Grand Avenue is expected to be adopted through the Southeast Los Angeles Community Plan Update process that is currently advancing through the City's approval process. The Department of City Planning and DOT evaluated the current street designations within the community plan area to develop revised street standards that provide an enhanced balance between traffic flow and other important street functions including transit routes and stops, pedestrian environments, bicycle routes, building design and site access, etc.

The applicant should check with the Bureau of Engineering's (BOE) Land Development Group to determine the specific highway dedication, street widening and/or sidewalk requirements for this project.

C. Parking Requirements

The traffic study did not indicate the number of parking spaces that would be provided by the project. The developer should check with the Department of Building and Safety on the number of Code-required parking spaces needed for the project.

D. Driveway Access and Circulation

The conceptual site plan for the project (illustrated in **Attachment 3**) is acceptable to DOT. However, the review of this study does not constitute approval of the driveway dimensions, access and circulation scheme. Those require separate review and approval and should be coordinated with DOT's Citywide Planning Coordination Section (201 N. Figueroa Street, 4th Floor, Station 3, @ 213-482-7024). In order to minimize and prevent last minute building design changes, the applicant should contact DOT, prior to the commencement of building or parking layout design efforts,

for driveway width and internal circulation requirements so that such traffic flow considerations are designed and incorporated early into the building and parking layout plans. All driveways should be Case 2 driveways and 30 feet and 16 feet wide for two-way and one-way operations, respectively. All delivery truck loading and unloading shall take place on site with no vehicles having to back into the project via one of the proposed project driveways.

E. Development Review Fees

An ordinance adding Section 19.15 to the Los Angeles Municipal Code relative to application fees paid to DOT for permit issuance activities was adopted by the Los Angeles City Council in 2009. This ordinance identifies specific fees for traffic study review, condition clearance, and permit issuance. The applicant shall comply with any applicable fees per this ordinance.

If you have any questions, please contact Wes Pringle of my staff at (213) 972-8482.

Attachments

Letters\CEN13-41162_233 washington mixed-use ts ltr.wpd

c: Tanner Blackman, Council District No. 14
Mehrdad Moshksar, Central District, DOT
Taimour Tanavoli, Case Management Office, DOT
Carl Mills, Central District, BOE
George Rhyner, Crain and Associates

Attachment 1

233 Washington Bl

Table 10

Level of Service (LOS) Summary Future Without and With Project Traffic Conditions

No.	Intersection	Peak Without Project			With Project		
		Hour	CMA	LOS	CMA	LOS	Impact
1	Grand Avenue and 17th Street	AM	0.340	A	0.349	A	0.009
		PM	0.776	C	0.794	C	0.018
2	Olive Street and 17th Street	AM	0.476	A	0.487	A	0.011
		PM	0.499	A	0.517	A	0.018
3	Hill Street and 17th Street	AM	0.469	A	0.470	A	0.001
		PM	0.587	A	0.591	A	0.004
4	Flower Street and 18th Street	AM	0.089	A	0.090	A	0.001
		PM	0.380	A	0.386	A	0.006
5	Grand Avenue and 18th Street	AM	0.351	A	0.351	A	0.000
		PM	0.462	A	0.485	A	0.023
6	Olive Street and 18th Street	AM	0.422	A	0.433	A	0.011
		PM	0.458	A	0.477	A	0.019
7	Flower Street and Washington Boulevard	AM	0.327	A	0.328	A	0.001
		PM	0.614	B	0.616	B	0.002
8	Grand Avenue and Washington Boulevard	AM	0.479	A	0.494	A	0.015
		PM	0.639	B	0.645	B	0.006
9	Olive Street and Washington Boulevard	AM	0.536	A	0.560	A	0.024
		PM	0.573	A	0.651	B	0.078
10	Hill Street and Washington Boulevard	AM	0.523	A	0.526	A	0.003
		PM	0.628	B	0.634	B	0.006
11	Habor Freeway (I110) NB Off-Ramps Adams Boulevard	AM	0.634	B	0.635	B	0.001
		PM	0.709	C	0.711	C	0.002
12	Grand Avenue and Adams Boulevard	AM	0.463	A	0.465	A	0.002
		PM	0.553	A	0.560	A	0.007

An * Indicates a significant impact (LADOT Revised Scale).

Attachment 2

233 Washington Bl

account.

Table 4

Project Trip Generation Rates

<u>LUC</u>	<u>Land Use/Description</u>	<u>Equations</u>	
220	Apartments		
	Daily:	$T = (6.06 * D) + 123.66$	Trips per dwelling unit
	AM Peak Hour:	$T = (0.49 * D) + 3.73$	Trips per dwelling unit
	Inbound	20%	
	Outbound	80%	
	PM Peak Hour:	$T = (0.55 * D) + 17.65$	Trips per dwelling unit
	Inbound	65%	
	Outbound	35%	
820	Retail (Shopping Center)		
	Daily:	$LN(T) = 0.65 * LN(A) + 5.83$	Trips per 1,000 Square Feet of Gross Floor Area
	AM Peak Hour:	$LN(T) = 0.61 * LN(A) + 2.24$	Trips per 1,000 Square Feet of Gross Floor Area
	Inbound	62%	
	Outbound	38%	
	PM Peak Hour:	$LN(T) = 0.67 * LN(A) + 3.31$	Trips per 1,000 Square Feet of Gross Floor Area
	Inbound	48%	
	Outbound	52%	

Table 5

Project Trip Generation

<u>LU</u>	<u>Use/Description</u>	<u>Size</u>	<u>Units</u>	<u>Daily</u>	<u>AM Peak Hour</u>			<u>PM Peak Hour</u>		
					<u>I/B</u>	<u>O/B</u>	<u>Total</u>	<u>I/B</u>	<u>O/B</u>	<u>Total</u>
220	Apartments	160	D. U.s	1,093	16	66	82	69	37	106
820	Retail (Shopping Center)	24	ksf	2,686	40	25	65	110	120	230
	Subtotal [A]			3,779	56	91	147	179	157	336
	<u>Internal Linkages</u>									
	Apartments		5%	(55)	(1)	(3)	(4)	(3)	(2)	(5)
	Retail (Shopping Center)		Based on Apt Trips	(55)	(3)	(1)	(4)	(2)	(3)	(5)
	Subtotal [B]			(110)	(4)	(4)	(8)	(5)	(5)	(10)
	<u>Transit/Walk-in Trips</u>									
	Apartments		25%	(260)	(4)	(16)	(20)	(17)	(8)	(25)
	Retail (Shopping Center)		25%	(658)	(9)	(6)	(15)	(27)	(29)	(56)
	Subtotal [C]			(918)	(13)	(22)	(35)	(44)	(37)	(81)
	[D] Driveway/Adj. Int. Trips = [A] + [B] + [C]			2,751	39	65	104	130	115	245
	Retail Passby Trips [E]		50%	(987)	(14)	(9)	(23)	(41)	(44)	(85)
	[F] Area Int. Trips (Proposed Uses) = [D]+[E]			1,764	25	56	81	89	71	160

Attachment 3
233 Washington Bl

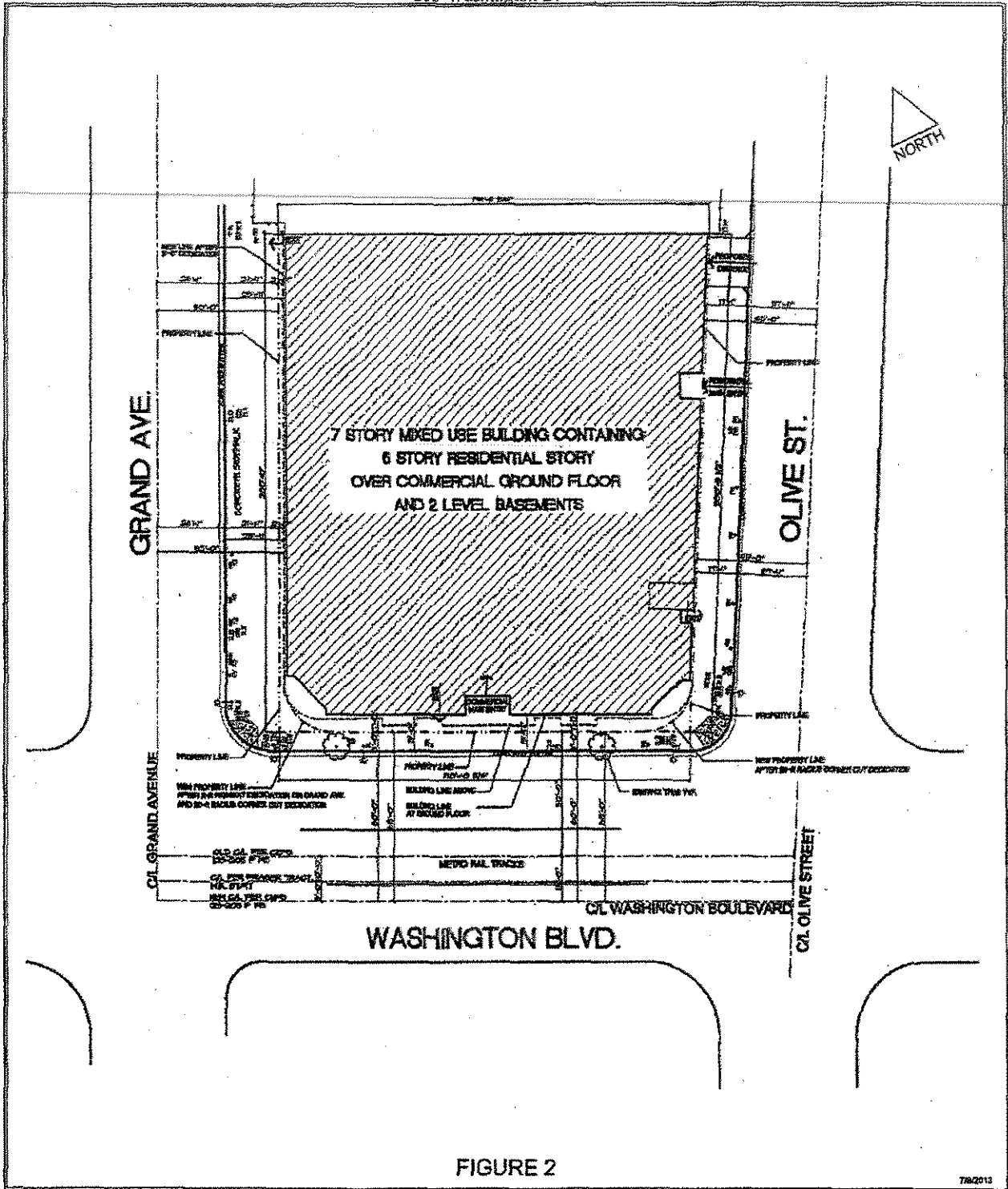


FIGURE 2

7/8/2013

FL GRAND METROPOLITAN MIXED USE GRAPHIC SITE PLAN

CONCEPTUAL PROJECT SITE PLAN

CA CRAIN
TRANSPORTATION PLANNING
&
TRAFFIC ENGINEERING
ASSOCIATES

300 Corporate Plaza, Suite 470
Culver City, California 90230
PH (310) 473-6956 F (310) 444-1771
www.crainandassociates.com

RESPONSES TO COMMENTS

COMMENTS ON THE INITIAL STUDY/PROPOSED MITIGATED NEGATIVE DECLARATION

The City of Los Angeles, Department of City Planning, the lead agency under the authority of the California Environmental Quality Act (CEQA), received two letters that provided comments on the Grand Metropolitan project (herein referred to as the "Proposed Project") Initial Study/Proposed Mitigated Negative Declaration (IS/PMND) before and during the designated comment period (between May 22 and June 23, 2014). Each comment letter has been assigned a corresponding number, and comments within each comment letter are also numbered. For example, comment letter "1" is from the South Coast Air Quality Management District. The comments in this letter are numbered "1-1", "1-2", etc..

Written comments made during the public review for the IS/PMND intermixed points and opinions relevant to project approval/disapproval with points and opinions relevant to the environmental review presented in the IS/PMND. Section 15204(a) of the State CEQA Guidelines¹ ("CEQA Guidelines") encourages reviewers to examine the sufficiency of the environmental document, particularly in regard to significant effects, and to suggest specific mitigation measures and project alternatives. Based on judicial interpretation of this section, the lead agency is not obligated to undertake every suggestion given it, provided that the lead agency responds to significant environmental issues and makes a good faith effort at disclosure. Furthermore, Section 15204(c) advises reviewers that comments should be accompanied by factual support. The responses to comments provided in this document provide detailed responses to all comments related to the environmental review and assessments provided in the IS/PMND and discuss as appropriate the points raised by commenters regarding project design and opinions relating to project approval. The latter are usually statements of opinion or preference regarding a project's design or its presence as opposed to points within the purview of an IS/MND: environmental impact and mitigation and often take the form of opinions that would be taken into consideration by decision makers regarding whether or not to approve the Proposed Project.

The following organizations/persons provided written comments on the IS/PMND to the lead agency before and during the designated review period, up to and including the Deputy Advisory Agency hearing. A summary of the issues raised in each comment letter is provided below.

- | | | |
|----|---|---------------|
| 1. | South Coast Air Quality Management District
Edward A. Eckerle, Program Supervisor
Planning, Rule Development & Area Sources | May 30, 2014 |
| 2. | Joyce Dillard, e-mail | June 23, 2014 |

¹ California Code of Regulations Title 14, Chapter 3, Sections 15000-15387.

**Table 1
Comments on the Draft MND**

SUMMARY OF COMMENTS Grand Metropolitan Project		Letter Number	Aesthetics	Agriculture	Air Quality	Biological Resources	Cultural Resources	Geology/Soils	Hazards & Hazardous Materials	Hydrology/Water Quality	Land Use/Planning	Mineral Resources	Noise	Population/Housing	Public Services	Recreation	Transportation/Traffic	Utilities/Service Systems	Other	Explanation of Other	
CEQA Environmental Review Process																					
South Coast Air Quality Management District		1			•				•												
Joyce Dillard		2						•	•		•						•	•			

Comment Letter No. 1



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178

(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS:

May 30, 2014

Ondrea.Tye@lacity.org

Ms. Ondrea Tye, Planning Associate
City of Los Angeles, City Hall
Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012

**Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) for the
Proposed Mixed-Use Residential and Retail Building Project Located at 233 W.
Washington Boulevard in Los Angeles (ENV-2008-386-MND)**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final MND.

Project Description

In the project description, the lead agency proposes to demolish the existing parking lot and construct a new 271,119 square foot, seven-story, mixed use building consisting of 160-unit residential condominium units, 24,000 square feet of ground floor commercial retail space, and a 173-space, two-level subterranean parking structure. Although excavation and soil export would likely occur during the construction phases for the proposed underground parking structure, the details surrounding the excavation and soil export were not included in the Draft MND. The project description should be revised to include any proposed excavation and soil export. The air quality impacts from these activities should also be incorporated into any applicable analysis in the Final MND.

Construction and Operation Air Quality Impacts

The SCAQMD staff is concerned that the lead agency determined that project air quality and health effect impacts were less than significant without quantifying these potentially adverse impacts in the Draft MND. In the Air Quality Section, the lead agency appears to have based its determination by using the screening tables in Chapter 6 of the SCAQMD's 1993 CEQA Air Quality Handbook (SCAQMD Handbook), which use the SCAQMD staff has not supported for a number of years because those screening tables are now outdated. In addition, the tables do not account for activities like excavation for the underground parking or locating residences near high-volume highways. As a result of relying solely on the screening tables, instead of quantifying air quality impacts, the

lead agency has failed to demonstrate that the proposed project will not generate significant adverse construction or operational air quality impacts that may trigger further analysis pursuant to the California Environmental Quality Act. Therefore, the SCAQMD staff recommends that the lead agency demonstrate that project impacts are less than significant in the Final MND by estimating short- and long-term air quality impacts using recognized resources such as the current California Emission Estimator Model (CalEEMod).¹ CalEEMod is a statewide land use emissions model that can quantify potential project criteria pollutant and greenhouse (GHG) emissions. The lead agency can also estimate project emissions by following the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the South Coast SCAQMD Handbook.² Should the lead agency conclude after its analyses that construction or operational air quality impacts exceed the SCAQMD daily significance thresholds, staff has compiled mitigation measures³ in addition to the mitigation included in the Draft MND starting on page two of the Draft MND to be implemented if the air quality impacts are determined to be significant.

1-1 cont.

Health Risk Effects from High Volume Freeway

Because of the proximity of the proposed residential use to a high volume freeway, the SCAQMD staff recommends that the lead agency conduct a health risk assessment (HRA) to determine the health risk effects from the proposed freeway traffic that includes diesel particulate matter, a carcinogenic, from diesel fueled vehicles operating on the freeway. Specifically, the proposed project includes 160 residential condominium units and appears to be located approximately 397 feet southwest of the I-10 Freeway,⁴ which has an average daily traffic volume of 243,000 vehicles. Current guidance from the California Air Resources Board recommends avoiding siting new sensitive receptors (e.g., residences, schools, daycare centers, playgrounds, medical facilities, etc.) within 500 feet of a freeway in their Land Use Handbook⁵ to avoid this exposure.

1-2

In addition, recent research has revealed that pollutants found in close proximity to freeways are associated with a variety of adverse health effects, independent of regional air quality impacts.⁶ These can include reduced lung capacity and growth,⁷ cardiopulmonary disease;⁸ increased incidence of low birth weight, premature birth, and birth defects.⁹

¹ <http://www.aqmd.gov/ceqa/models.html>

² <http://www.aqmd.gov/ceqa/hdbk.html>

³ http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

⁴ Aerial map inspection.

⁵ CARB Air Quality and Land Use Handbook: A Community Health Perspective (April 2005): <http://www.arb.ca.gov/ch/handbook.pdf>

⁶ "Special Report 17. Traffic-related air pollution: A critical review of the literature on emissions, exposure, and health effects". Health Effects Institute, May 2009; 394 p.

⁷ "Effect of exposure to traffic on lung development from 10 to 18 years of age: a cohort study". Gauderman WJ et al., Lancet, February 2007; 369 (9561): 571-7.

⁸ "Exposure to traffic and the onset of myocardial infarction". Peters A et al., The New England Journal of Medicine, 351(17):1721-1730.

⁹ Ritz B, et al. 2002 Ambient air pollution and risk of birth defects in Southern California. Am J Epidemiology, 155:17-25

Ms. Ondrea Tye,
Planning Associate

3

May 30, 2014

Further, while the health science behind recommendations against placing new homes close to freeways is clear, the SCAQMD staff recognizes the many factors lead agencies must consider when siting new housing. Many mitigation measures have been proposed for other projects to reduce exposure, including building filtration systems, sound walls, vegetation barriers, etc.. However, because of the potential health risks involved, it is critical that any proposed mitigation must be carefully evaluated prior to determining if those health risks would be brought below recognized significance thresholds.


1-2 cont.

Response to Comments and Contact Information

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The SCAQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

1-3

Sincerely,



Edward A. Eckerle
Program Supervisor
Planning, Rule Development & Area Sources

EE:GM

LAC140522-09
Control Number

Comment Letter No. 1

Edward A. Eckerle, Program Supervisor
 Planning, Rule Development & Area Sources
 South Coast Air Quality Management District
 21865 Copley Drive
 Diamond Bar, CA 91765-4178
 May 30, 2014

Response 1-1

The commenter expresses concern that the lead agency determined that potential air quality and health effects of the Proposed Project were determined to be less than significant without quantifying these effects. The commenter's concerns are addressed in the technical report prepared to address the air quality impacts of the Proposed Project (*Air Quality Impact Analysis for the Grand Metropolitan Mixed-Use Project*, prepared by Cadence Environmental Consultants, July, 2013), which is included as Appendix A to this Responses to Comments document. A project may have a significant impact if project-related emissions would exceed federal, State, or regional standards or thresholds, or if project-related emissions would substantially contribute to an existing or projected air quality violation. To address potential impacts from construction and operational activities, the SCAQMD currently recommends that impacts from projects with mass daily emissions that exceed any of the thresholds outlined in Table 2 below (SCAQMD Thresholds of Significance) be considered significant. The City of Los Angeles defers to these thresholds for the evaluation of construction-related and operational air quality impacts.

Table 2
SCAQMD Thresholds of Significance

Pollutant	Construction Thresholds (lbs/day)	Operational Thresholds (lbs/day)
Volatile Organic Compounds (VOC)	75	55
Nitrogen Oxides (NO _x)	100	55
Carbon Monoxide (CO)	550	550
Sulfur Oxides (SO _x)	150	150
Respirable Particulate Matter (PM ₁₀)	150	150
Fine Particulate Matter (PM _{2.5})	55	55
<i>Note: lbs = pounds.</i>		
<i>Source: South Coast Air Quality Management District, Air Quality Significance Thresholds, website: http://aqmd.gov/ceqa/handbook/signthres.pdf.</i>		

Mass Daily Construction Emissions

Construction of the Proposed Project is expected to begin in August 2015 and last for approximately 22 months. The construction-related activities would include the demolition of the existing surface parking

lot and excavation of the project site for the new subterranean parking garage, construction of the subterranean parking structure, and construction of the proposed mixed-use building. As with all construction projects less than five acres in size, the proposed project would be subject to the best available control measures of SCAQMD Rule 403 for the control of fugitive dust throughout the construction phases of development.

The analysis of mass daily construction emissions has been prepared utilizing the California Emissions Estimator Model (CalEEMod v. 2011.1.1) recommended by the SCAQMD. The estimated mass daily construction-related emissions are shown in Table 3 (Estimated Mass Daily Construction Emissions). These emissions assume a worst-case scenario in which the full set construction equipment would be used each day throughout the entire construction phase. In reality, each piece of equipment would only be used for a portion of each day and there would be days when very little equipment is used.

As shown in Table 3 (Estimated Mass Daily Construction Emissions), the mass daily construction-related emissions generated during the project construction phase would not exceed the thresholds of significance recommended by the SCAQMD. Therefore, this impact of the project would be less than significant.

Table 3
Estimated Mass Daily Construction Emissions

Year with Construction Activity	Peak Day Emissions in Pounds per Day					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
2015	3.21	26.11	18.17	0.04	89.21	1.66
2016	2.94	17.17	22.48	0.05	3.55	1.04
2017	29.28	17.92	25.09	0.06	4.09	1.14
SCAQMD Thresholds of Significance	75.0	100.0	550.0	150.0	150.0	55.0
Significant Impact?	No	No	No	No	No	No

Calculated PM₁₀ and PM_{2.5} emissions assume compliance with SCAQMD Rule 403.
Source: Cadence Environmental Consultants, 2013. CalEEMod results sheets are provided in Appendix A.

Mass Daily Operational Emissions

Operational emissions generated by area sources, energy sources, and mobile sources would result from the increased amount of normal day-to-day activities at the project site after occupation. The increase in daily operational emissions has been calculated utilizing CalEEMod. The results of these calculations are presented in Table 4 (Estimated Mass Daily Operational Emissions). As shown, the Proposed Project would generate an increase of mass daily emissions that does not approach the thresholds of significance recommended by the SCAQMD. As such, the impact of the project would be less than significant.

Table 4
Estimated Mass Daily Operational Emissions

Emissions Source	Emissions in Pounds per Day					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area Sources	5.88	0.16	13.45	0.00	0.07	0.07
Energy Consumption	0.06	0.48	0.21	0.00	0.04	0.04
Mobile Sources	10.29	22.95	87.41	0.18	19.98	1.25
Total Emissions	16.23	23.59	101.07	0.18	20.09	1.36
SCAQMD Thresholds	55.00	55.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No

Source: Cadence Environmental Consultants, 2013. CalEEMod results sheets are provided in Appendix A.

A significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors. Land uses that are considered more sensitive to changes in air quality than others are referred to as sensitive receptors. Land uses such as primary and secondary schools, hospitals, and convalescent homes are considered to be sensitive to poor air quality because the very young, the old, and the infirm are more susceptible to respiratory infections and other air quality-related health problems than the general public. Residential uses are considered sensitive because people in residential areas are often at home for extended periods of time, so they could be exposed to pollutants for extended periods. Recreational areas are considered moderately sensitive to poor air quality because vigorous exercise associated with recreation places a high demand on the human respiratory function.

The nearest sensitive receptors to the proposed project site are the students of the LA Trade Tech Community College located to the southeast of the project site.

The SCAQMD has developed localized significance threshold (LST) look-up tables for project sites that are one, two, and five acres in size to simplify the evaluation of localized emissions at small sites. LSTs are provided for each SRA and various distances from the source of emissions. In the case of this analysis, the Proposed Project site is located within SRA 1 and the nearest sensitive receptor location is approximately 300 feet from the site. Therefore, the LSTs for a one-acre site and receptors located within 25 meters are used to address the potential localized NO_x, CO, PM₁₀, and PM_{2.5} impacts to the area surrounding the project site.²

² The closest receptor distance in the SCAQMD's mass rate look-up tables is 25 meters. Projects that are located closer than 25 meters to the nearest receptor are directed to use the LSTs for receptors located within 25 meters.

Localized Construction Emissions

Table 5 (Estimated Daily Localized Construction Emissions) identifies the maximum daily emissions that are estimated to occur at the project site during the construction phases of the Proposed Project. As shown, emissions during the construction phases would not exceed the SCAQMD's LST for the specified pollutants. Therefore, impacts related to localized pollutant concentrations during construction would be less than significant.

Table 5
Estimated Daily Localized Construction Emissions

Construction Phase	Total On-site Emissions (Pounds per Day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Demolition of Existing Surface Parking Lot				
On-site Emissions	12.02	9.21	1.01	0.84
SCAQMD Localized Thresholds	74.00	280.00	5.00	3.00
Significant Impact?	No	No	No	No
Site /Foundation Preparation				
On-site Emissions	10.52	8.49	1.03	0.88
SCAQMD Localized Thresholds	74.00	280.00	5.00	3.00
Significant Impact?	No	No	No	No
Parking Structure Construction				
On-site Emissions	8.84	6.31	0.43	0.43
SCAQMD Localized Thresholds	74.00	280.00	5.00	3.00
Significant Impact?	No	No	No	No
Building Construction (including architectural coatings)				
On-site Emissions	13.23	12.37	0.78	0.78
SCAQMD Localized Thresholds	74.00	280.00	5.00	3.00
Significant Impact?	No	No	No	No
<i>Note: Localized thresholds for construction emissions at a 1-acre site at a receptor distance of 25 meters, as established by the SCAQMD for sites in SRA 1.</i>				
<i>Source: Cadence Environmental Consultants, 2013. CalEEMod results sheets are provided in Appendix A.</i>				

Localized Operational Emissions

The average daily operational emissions that would be generated at the Proposed Project site are shown in Table 6 (Estimated Daily Localized Operational Emissions) along with the applicable operational LSTs for SRA 1. As shown on-site operational emissions generated by the Proposed Project would not approach the established SCAQMD localized thresholds. Therefore, this impact would be less than significant.

Table 6
Estimated Daily Localized Operational Emissions

Emissions Source	Emissions in Pounds per Day			
	NO _x	CO	PM ₁₀	PM _{2.5}
Area Sources	0.16	13.45	0.07	0.07
Energy Sources	0.48	0.21	0.04	0.04
Total Emissions	0.64	13.66	0.11	0.11
SCAQMD Localized Thresholds	74.00	280.00	3.00	1.00
Significant Impact?	No	No	No	No

Note: Localized thresholds for operational emissions at a 1-acre site at a receptor distance of 25 meters, as established by the SCAQMD for sites in SRA 1.

Source: Cadence Environmental Consultants, 2013. CalEEMod results sheets are provided in Appendix A.

Response 1-2

The commenter contends that the lead agency should conduct a health risk assessment to determine the effects in the Proposed Project from freeway traffic. The commenter acknowledges that the SCAQMD recognizes the many factors that lead agencies must consider in siting housing and recommends consideration of mitigation measures to reduce exposure. The proposed project would locate residences within 1,000 feet of a freeway, where studies have shown potential health risks to residents from ambient air quality in the immediate vicinity of freeway routes. On November 8, 2012, the Freeway Adjacent Advisory Notice for Sensitive Uses (Zoning Information [Z.I.] No. 2427), adopted by the Los Angeles City Planning Commission, became effective. This notice serves to advise applicants for discretionary land use requests under the authority of the City Planning Commission of the Commission's concerns regarding the placement of sensitive uses near freeways. While Z.I. No 2427 does not prohibit the siting of sensitive uses within 1,000 feet of a freeway, it does recommend the incorporation of measures designed to lessen the effects of exposure to ambient air quality within such area. These measures include the following, which shall be implemented by the Proposed Project as design features:

- Improve Indoor Air Quality with MERV-rated or HEPA Air Filtration Equipment – the Proposed Project will install and maintain air filters meeting or exceeding the ASHRAE Standard 52.2 Minimum Efficiency Reporting Value (MERV) of 11 or higher.
- Further Reduce Exposure Through Project Design
 - Building Orientation – The Proposed Project would be oriented toward Washington Boulevard away from the freeway to the north. As such, a minimal number of units would be located along the building edge closest to the freeway. The common area courtyard is located in the interior of the building, where it would be screened by the building walls from the higher concentrations of particulates that can be found within the ambient air immediately adjacent to the freeway.

- Screening with Vegetation – The Proposed Project would include landscaping and trees between the proposed building and the freeway, which would have the potential to remove particulate matter.
 - Reduce Operable Windows – The Proposed Project design would minimize the number of operable windows on the north (freeway-facing) frontage.
-

Additionally, there are many State and Local policy initiatives that directly and indirectly seek to reduce the pollution levels generated from transportation. A few examples include the State of California's landmark land use legislation; SB 375 which implements AB 32, and was adopted in September 2008. These state laws effectively linked transportation planning and funding to land use and housing needs. These measures would lessen the effects of ambient air quality on the residents of the Proposed Project and would thus not pose a serious public health risk to either residents or neighbors of the Proposed Project.

Response 1-3

The commenter requests that SCAQMD be provided with written responses to these comments prior to adoption of the Final IS/MND. The responses contained within this Responses to Comments document were provided to SCAQMD prior to the hearing on the project at which the decision makers considered whether or not to adopt the MND and approve the project.

Comment Letter No. 2

From: **Joyce Dillard** <dillardjoyce@yahoo.com>

Date: Mon, Jun 23, 2014 at 4:00 PM

Subject: Comments ENV-2008-386. 233 W. Washington Blvd due 6.23.2014

To: Darlene Navarrete <Darlene.Navarrete@lacity.org>

Methane Prevention Detection and Monitoring Program (Mitigation Plan) has not been submitted with the Methane Control System.

There is no indication of any methane mitigation measures, monitoring and reporting or any construction safeguards for migrating methane gas during the construction phase or during continuous occupancy. Dewatering has not been addressed nor have the NPDES National Pollutant Discharge Elimination System permit and the MS4 permit.

The City of Los Angeles has failed to implement Ordinance 175790 to properly protect the Health and Safety of its citizens.

The Ordinance 175790 states: issued upon

*Permits may be issued upon **submittal of detailed plans** that show adequate protection against flammable gas incursion by providing the installation of suitable methane mitigation systems.*

There remain no ongoing Methane Task Force or open public meetings.

There are no position authorities authorized in the budget for properly trained personnel to oversee, scientifically report and monitor. There are no incorporated standards of the National Fire Protection Association. Reliance on un-trained, un-licensed personnel to approve any actions leaves the city liable.

Methane gas should be analyzed in its role as greenhouse gas contributor to climate change and sea level rise. Sea level rise increases the potential for flooding.

The project is within a Fault Zone.

The General Plan reflects no plan for mitigation measures of this nature. The Conservation Element of the General Plan was adopted September 26, 2001, CFI 01-1094. The Conservation Element is required by the State of California.

There is no adopted Circulation Element which is a comprehensive infrastructure plan addressing the circulation of people, goods, energy, water, sewage, storm drainage and communications. Circulation Element is required by State law.

The project is not consistent with Framework Element Policy No. 3.3.2.

Infrastructure needs are attached in the enclosed 2010-2011 Infrastructure Report Card.

An Environmental Impact Report needs to be prepared.

Joyce Dillard
P.O. Box 31377
Los Angeles, CA 90031

Attachment:
INFRASTRUCTURE REPORT CARD_2010_2011 B&W

2-1

2-2

2-3

2-4

2-5

2-6

2-7

Comment Letter No. 2

Joyce Dillard, e-mail

June 23, 2014

Response 2-1

The commenter contends that a Methane Prevention Detection and Monitoring Program has not been submitted for the Proposed Project. The commenter further contends that mitigation measures for methane gas have not been identified, nor have the requirements of the NPDES permit and MS4 permit. The commenter's opinion in this regard is noted and will be considered by the decision making bodies in determining whether to approve the project. The IS/PMND identifies (page 25) that the Proposed Project site is located within a methane zone and includes a mitigation measure (VIII-20) that would reduce potential impacts related to methane gas conditions to less than significant. This mitigation measure requires that a methane study be performed and a methane mitigation system meeting the requirements of the Citywide Methane Code (Section 91.7102 of the Municipal Code) be installed in the Proposed Project. This system must be approved by the Department of Building and Safety prior to construction of the Proposed Project. The Department of City Planning, as lead agency for the Proposed Project under CEQA, relies on the Department of Building and Safety for expertise in ensuring that the Proposed Project will meet the requirements of the City's Building Code that are intended to ensure that projects within the City are constructed and operated safely.

With respect to the requirements of the NPDES permit and MS4 permit, construction associated with the Proposed Project would be subject to the requirements of the Los Angeles Regional Water Quality Control Board Order No. R4-2012-0175, NPDES No. CAS00400, effective December 28, 2012, Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles County (the "Los Angeles County MS4 Permit"), which controls the quality of runoff entering municipal storm drains in the County. Section VI.D.8, of this Permit, Development Construction Program, requires Permittees (which include the City of Los Angeles) to enforce implementation of Best Management Practices (BMPs), including, but not limited to, approval of an Erosion and Sediment Control Plan (ESCP) for all construction activities within their jurisdiction. Accordingly, the construction contractor for the Proposed Project would be required to implement BMPs that would meet or exceed local, State, and Federal mandated guidelines for storm water treatment to control erosion and to protect the quality of surface water runoff during the construction period. *BMPs utilized could include, without limitation, disposing of waste in accordance with all applicable laws and regulations; cleaning up leaks, drips, and spills immediately; conducting street sweeping during construction activities; limiting the amount of soil exposed at any given time; covering trucks; keeping construction equipment in good working order; and installing sediment filters during construction activities.*

With respect to runoff water quality during operation of the Proposed Project, Los Angeles County and all cities within LA County (except for the City of Long Beach) are permittees under the Los Angeles County MS4 Permit. Section VI.D.7 of this Permit, Planning and Land Development Program, is applicable to, among others, land-disturbing activities that result in the creation or addition or replacement of 5,000 square feet or more of impervious surface area on an already developed site, would thus apply to the proposed project. The Proposed Project would also be subject to the BMP requirements of the Standard Urban Stormwater Mitigation Plan (SUSMP) adopted by the Regional Water Quality Control Board for the Los Angeles Region. As a permittee, the City of Los Angeles is responsible for implementing the requirements of the County-wide SUSMP within the City. A Project-specific SUSMP would be implemented during the operation of the proposed project. The City of Los Angeles implements the MS4 and SUSMP requirements through the Low Impact Development (LID) Ordinance. Implementation of the LID Ordinance within the Proposed Project is addressed in the IS/PMND on pages 26 and 27. With appropriate Project design and compliance with the applicable Federal, State, local regulations, and permit provisions, impacts of the Proposed Project related to stormwater runoff quality would be less than significant.

Response 2-2

The commenter contends that methane gas should be analyzed for its role in climate change as a greenhouse gas contributor. Methane emitted from soil as a result of organic decomposition that will continue to occur with or without the Proposed Project does not constitute a GHG emission attributable to the Proposed Project. The Proposed Project will include a methane mitigation system are required by the Citywide Methane Ordinance, which will not affect the quantity or quality of any gases which are currently venting, but will, as required: (1) prevent pressure buildup in the soil; (2) direct vented gases safely through engineered vent riser pipes; and (3) mitigate any current "capping" that may be associated with the existing paved parking area. The Proposed Project will have no impact on the quantity or quality of any gases which are currently venting, and therefore no change in greenhouse gas effects from methane.

Response 2-3

The commenter contends that the project is within a fault zone. The IS/PMND addresses (page 23) that the Proposed Project site is located within the Puente Hills Blind Thrust Fault Zone and identifies a mitigation measure (VI-10) that would reduce any impacts that would be associated with this location to less than significant. There are no mapped active or potentially active faults identified by the State, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, known to be present on or beneath the Project Site. The distance to the nearest active fault to the site, the Newport-Inglewood Fault, is approximately 4.3 miles (7.0 kilometers).

Response 2-4

The commenter contends that the General Plan Conservation Element does not include mitigation measures for projects in fault zones. The Conservation of the City of Los Angeles General Plan indicates that issues related to seismic hazards are addressed in the Safety Element of the General Plan (Conservation Element, page II-29). The Safety Element addresses seismic hazards within the City of Los Angeles (Safety Element, pages II-19 through II-22) and includes goals, objectives and policies related to hazard mitigation (Safety Element, pages III-1 and III-2). The Safety Element meets the requirements of State law for General Plan Safety Elements (Safety Element, pages I-3 through I-6). As discussed in Response 2-3, the IS/PMND addressed conditions at the Project Site related to fault zones and includes a mitigation measure that would reduce impacts to less than significant.

Response 2-5

The commenter contends that no General Plan Circulation Element has been adopted. The City of Los Angeles General Plan includes a Transportation Element, adopted September 8, 1999, that meets the requirements of State law for General Plan Circulation Elements.

Response 2-6

The commenter contends that the project is not consistent with Framework Element Policy 3.3.2 and does not address infrastructure needs. In summary, policy 3.3.2 of the General Plan Framework establishes a policy of conducting monitoring and reporting of population, development, and infrastructure and service capacities within the City and each community plan area. It requires the collection and reporting of information by the Department of City Planning for the City and individual community plan areas, specifically a Monitoring Program (Program 42) and an Annual Report on Growth and Infrastructure (Program 43). As such, policy 3.3.2 is not directly applicable to individual development projects, such as the Proposed Project, but rather addresses total growth in the community plan areas and the City as a whole.

Furthermore, in the case of *Saunders v. City of Los Angeles*, the Court of Appeal held that the manner by which the monitoring and requirements of the General Plan Framework are met is at the discretion of the Department of City Planning, stating:

“When the language of Programs 42 and 43 is read together and harmonized with other language of the Framework Element, including the clear and unambiguous introductory language to Chapter 10 governing the implementation of the programs established by the Framework Element, the implementation duties created by those programs emerge as discretionary. As the first paragraph of Chapter 10 explains, "not all plan policies can be achieved in any given action, and in relation to any decision, some goals may be more compelling than others. On a decision-by-decision basis, taking into consideration

facual circumstances, *it is up to decision makers to decide how best to implement the adopted policies* of the general plan in any way which best serves the public health, safety and general welfare." (Italics added.) That general language suggests that, as to program implementation, the City Council intended to vest the Planning Department with broad discretion and flexibility when deciding how best to implement the policies of the Framework Element."

The Court of Appeal also confirmed the finding of the trial court that the Department of City Planning had complied with these requirements by publishing the requisite data on its website, stating:

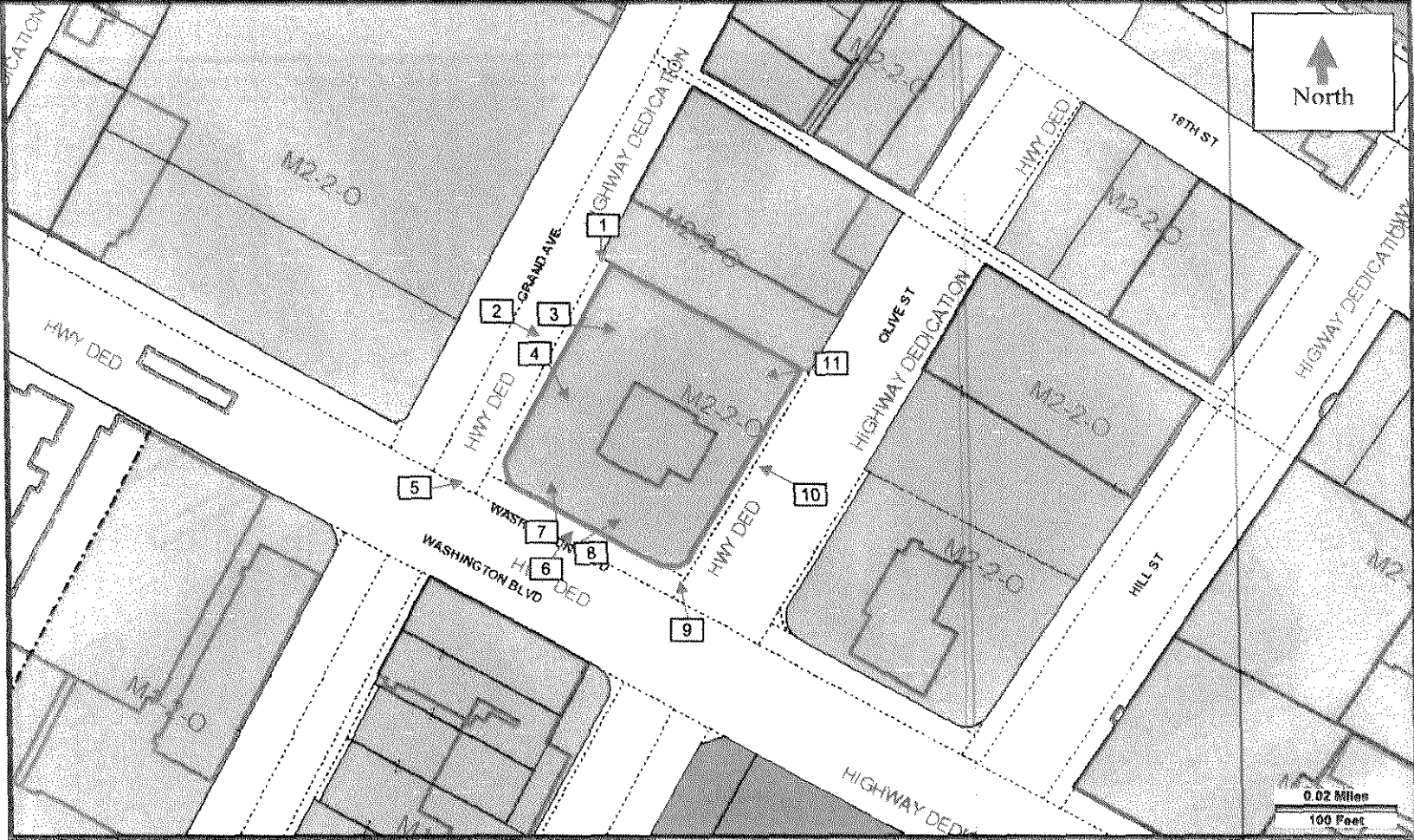
"The City implemented program 43 by preparing three bound annual reports for the years 1990-94, 1994-1996, 1996-1998. . . . The reports were expensive to produce and by the time they were bound they were already out of date. Thereafter, the City took advantage of new technology and expanded the information it made available to the public on its website. The information that would have been published as a bound report was available on the website. The City Council, Mayor and Planning Commission were notified of the changes. The information is updated quarterly and annually. . . . [¶] The City also established a monitoring program. The Planning Department has always monitored growth and development and worked with 11 technical departments to track infrastructure. . . . The City also has a transportation database. (Fn. omitted.) . . . Unlike the smaller cities familiar to petitioners' expert, responsibility for monitoring infrastructure is not centralized in [a] single `Community Development Department.'"

Accordingly, the City has been confirmed to be in compliance with Programs 42 and 43 of the General Plan Framework and there is no substantial evidence presented in the comment to conclude that the Proposed Project would be inconsistent with the General Plan Framework.

Response 2-7

The commenter contends that an Environmental Impact Report needs to be prepared for the Proposed Project. The commenter's opinion is noted and will be considered by the decision makers in deciding whether or not to approve the Proposed Project. Based upon substantial evidence provided in the record of the lead agency (the IS/PMND and this Responses to Comments Document), the Proposed Project may have a significant effect on the environment, but changes included in the Project as set forth in the mitigation measures in the IS/PMND would mitigate the effects to a point where clearly no significant effect on the environment would occur and there is no substantial evidence in light of the whole record before the lead agency that the project may have a significant effect on the environment. Therefore, in accordance with CEQA Guidelines Section 15064(f)(2), a mitigated negative declaration has been prepared for the Proposed Project, and no Environmental Impact Report is required.

SITE PHOTO EXHIBIT
Site Address: 233 W. Washington Boulevard
Applicant: 233 West Washington, LLC



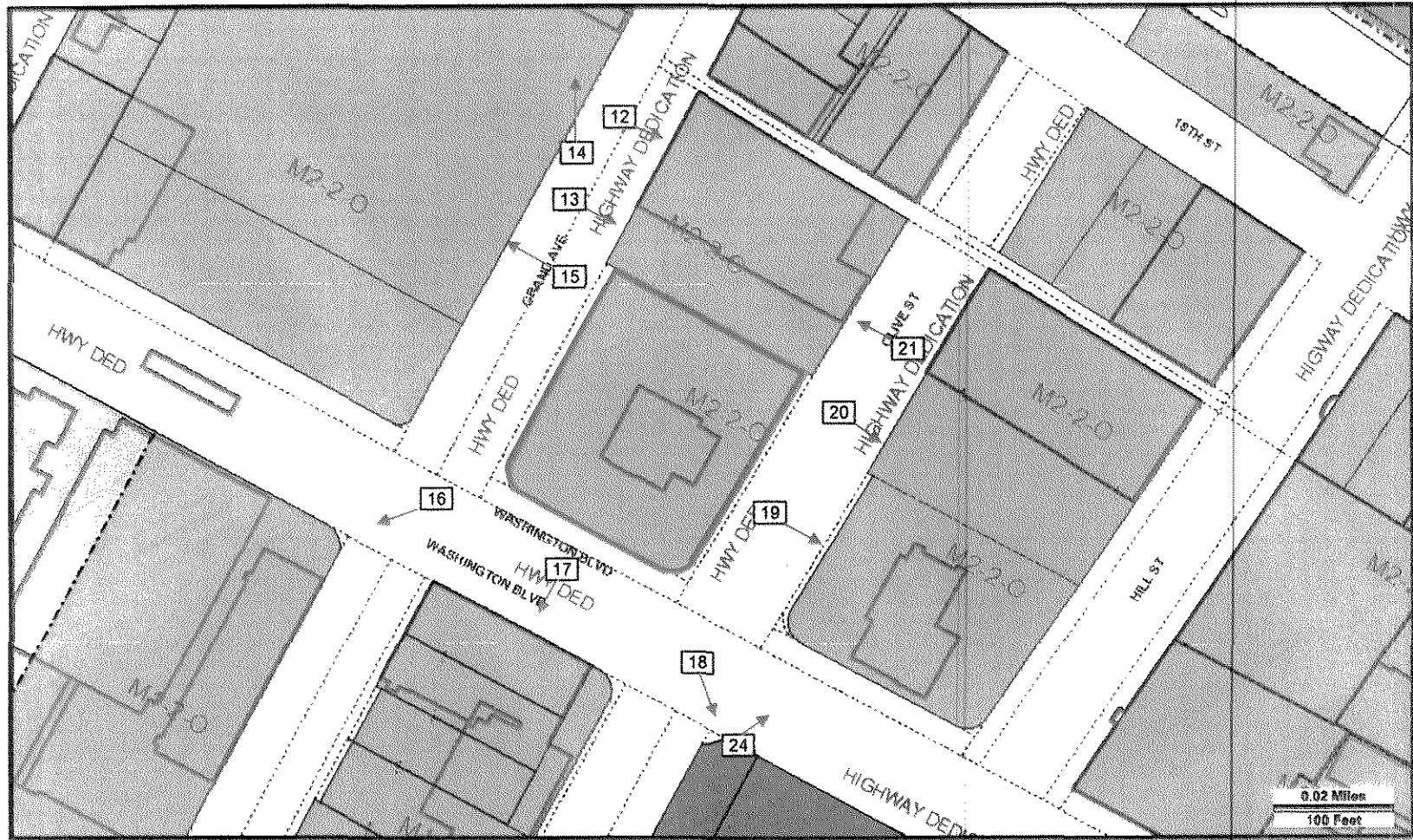
233 W. Washington Boulevard
233 West Washington, LLC

Prepared by Craig Lawson & Co., LLC
April 4, 2013

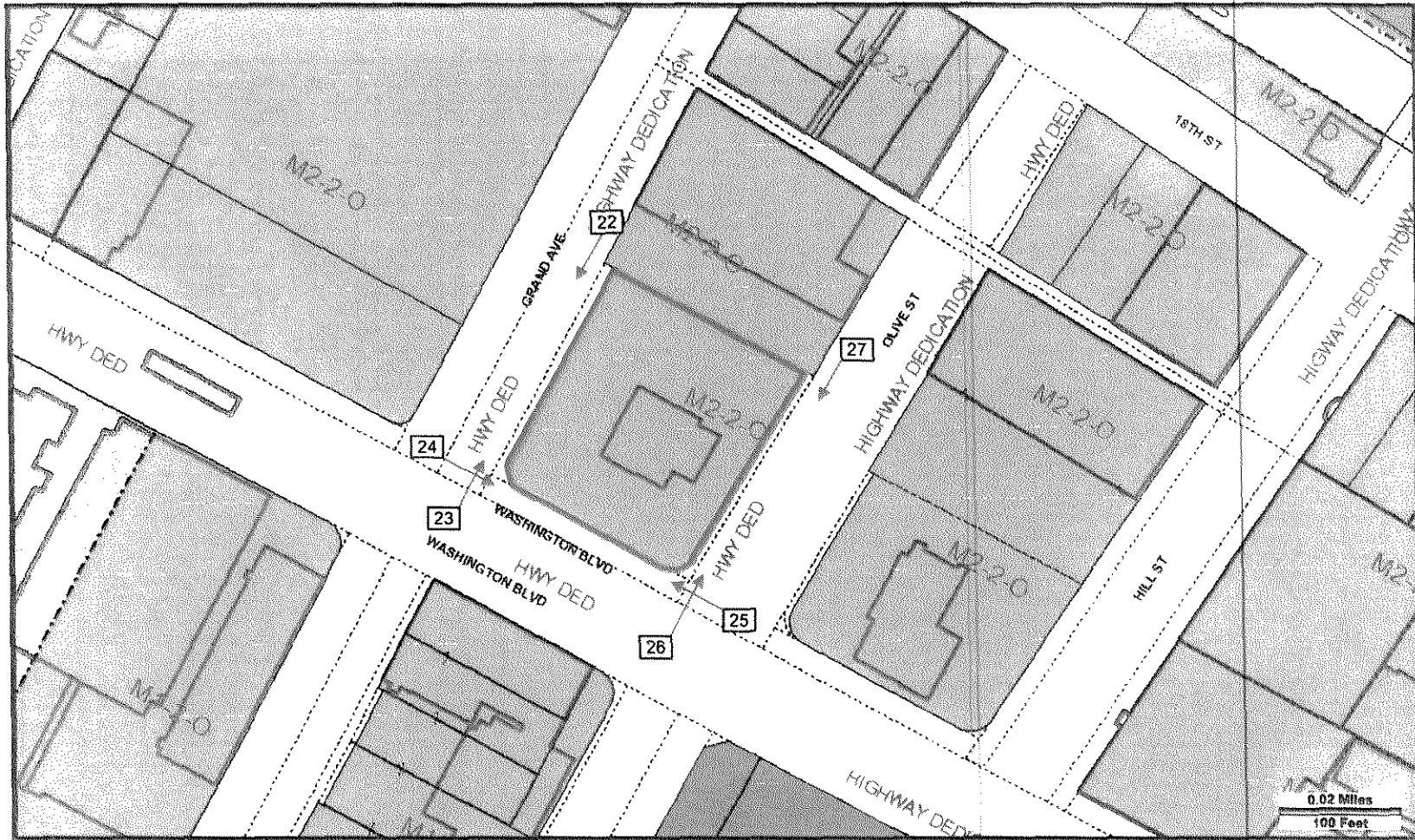
PHOTOS
CPC-2008-596-GPA-ZC-SPR

EXHIBIT D

SITE PHOTO EXHIBIT
Site Address: 233 W. Washington Boulevard
Applicant: 233 West Washington, LLC



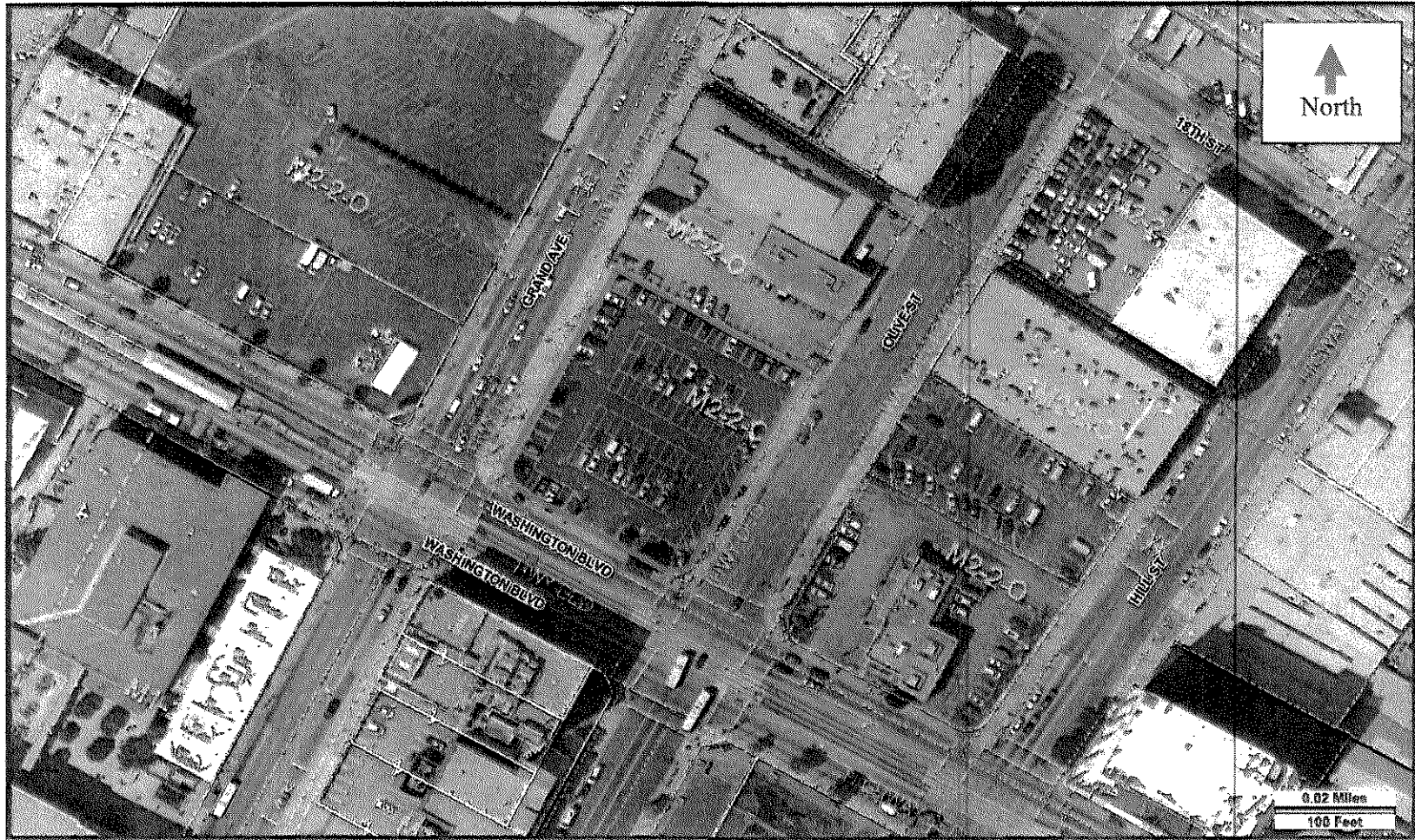
SITE PHOTO EXHIBIT
Site Address: 233 W. Washington Boulevard
Applicant: 233 West Washington, LLC



233 W. Washington Boulevard
233 West Washington, LLC

Prepared by Craig Lawson & Co., LLC
April 4, 2013

SITE PHOTO EXHIBIT
Site Address: 233 W. Washington Boulevard
Applicant: 233 West Washington, LLC



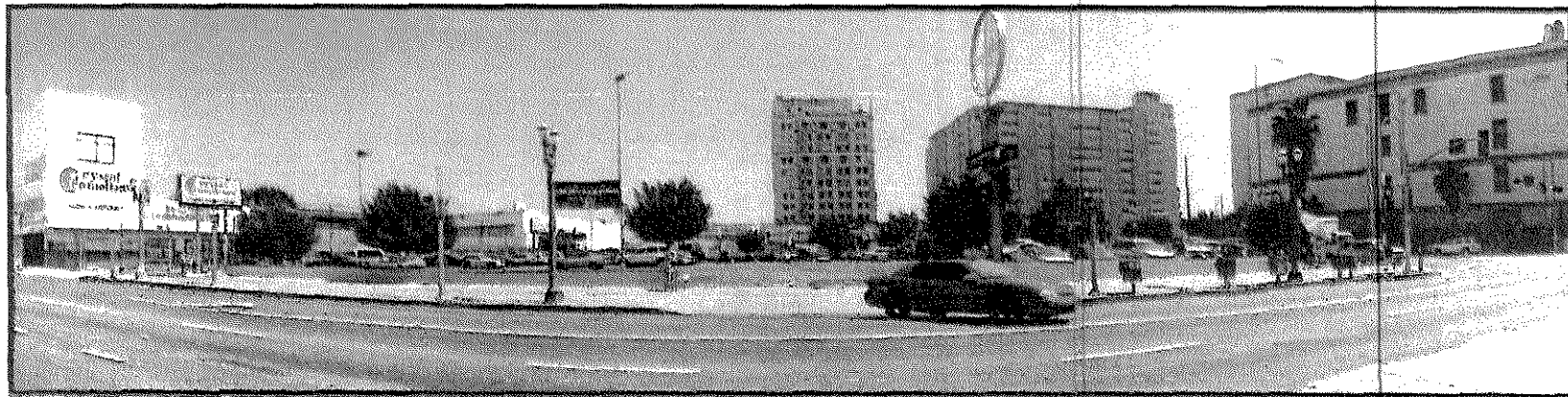
SITE PHOTO EXHIBIT

Site Address: 233 W. Washington Boulevard

Applicant: 233 West Washington, LLC



1. View of subject site, southerly facing from the northwestern corner of subject site along Grand Avenue.



2. View of Grand Avenue subject site frontage, southeasterly facing.

SITE PHOTO EXHIBIT
Site Address: 233 W. Washington Boulevard
Applicant: 233 West Washington, LLC



3. View of subject site, easterly facing from the driveway on Grand Avenue.

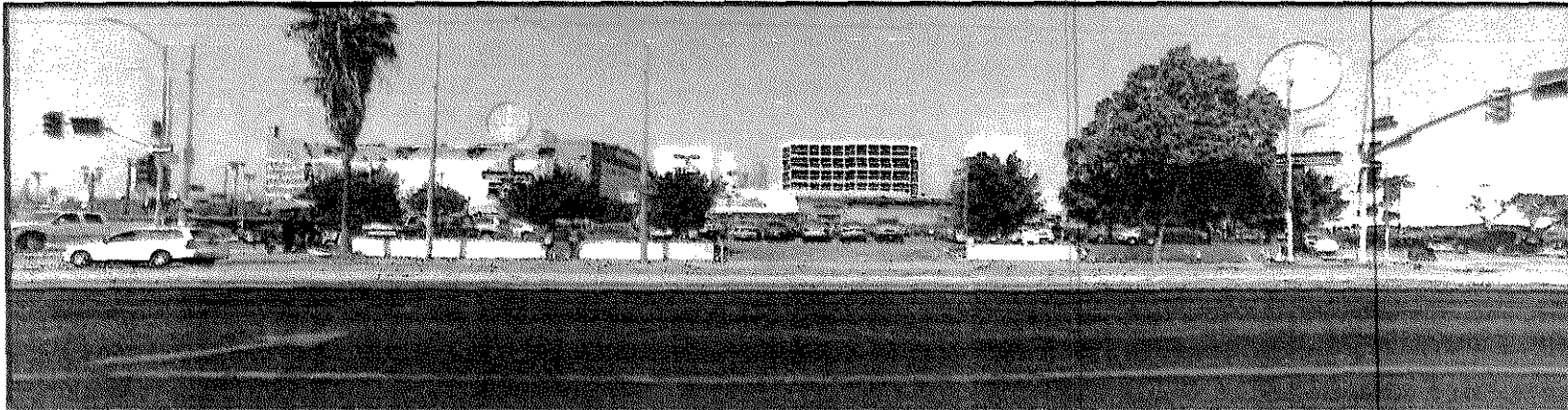


4. View of subject site, southeasterly facing from the driveway on Grand Avenue.

SITE PHOTO EXHIBIT
Site Address: 233 W. Washington Boulevard
Applicant: 233 West Washington, LLC



5. View of subject site, northeasterly facing from the corner of Grand Avenue at Washington Boulevard.



6. View of Washington Boulevard subject site frontage, northeasterly facing.

SITE PHOTO EXHIBIT
Site Address: 233 W. Washington Boulevard
Applicant: 233 West Washington, LLC



7. View of subject site, northerly facing from the driveway on Washington Boulevard.



8. View of subject site, northeasterly facing from the driveway on Washington Boulevard.

SITE PHOTO EXHIBIT

**Site Address: 233 W. Washington Boulevard
Applicant: 233 West Washington, LLC**



9. View of subject site, northwesterly facing from the corner of Washington Boulevard and Olive Street.



10. View of Olive Street subject site frontage, northwesterly facing.

SITE PHOTO EXHIBIT
Site Address: 233 W. Washington Boulevard
Applicant: 233 West Washington, LLC



11. View of subject site, southwesterly facing from Olive Street.

SITE PHOTO EXHIBIT
Site Address: 233 W. Washington Boulevard
Applicant: 233 West Washington, LLC



12. View of neighboring property northeast of subject site, southeasterly facing from Grand Avenue.



13. View of adjacent property northeast of subject site, southeasterly facing from Grand Avenue.

SITE PHOTO EXHIBIT
Site Address: 233 W. Washington Boulevard
Applicant: 233 West Washington, LLC



14. View of neighboring property north of subject site across Grand Avenue, northerly facing from Grand Avenue.



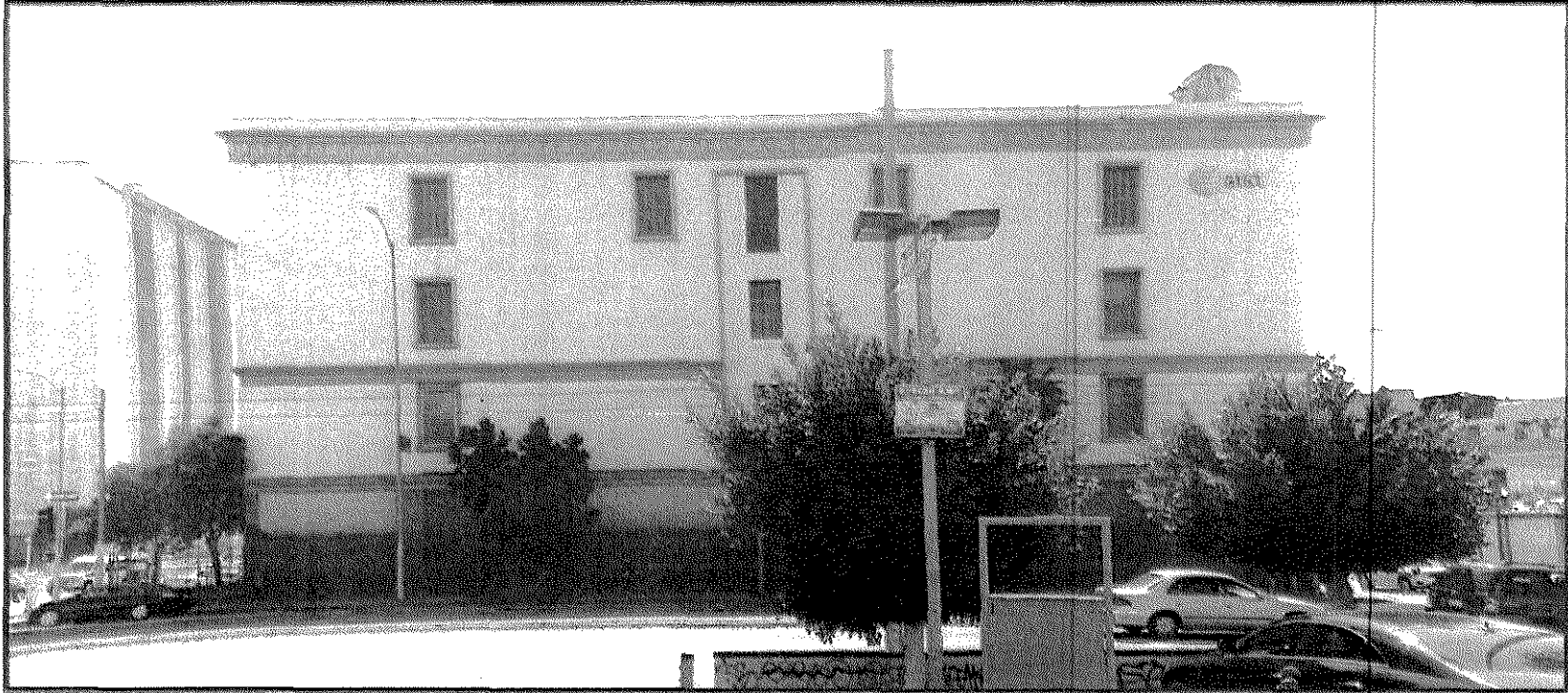
15. View of neighboring property northwest of subject site across Grand Avenue, northwesterly facing from Grand Avenue.

SITE PHOTO EXHIBIT
Site Address: 233 W. Washington Boulevard
Applicant: 233 West Washington, LLC



16. View of neighboring properties southwest of subject site across Grand Avenue and Washington Boulevard, southwesterly facing.

SITE PHOTO EXHIBIT
Site Address: 233 W. Washington Boulevard
Applicant: 233 West Washington, LLC



17. View of neighboring property southwest of subject site across Washington Boulevard, southwesterly facing.

SITE PHOTO EXHIBIT
Site Address: 233 W. Washington Boulevard
Applicant: 233 West Washington, LLC



18. View of neighboring properties southeast of subject site across Washington Boulevard and Olive Street, southeasterly facing.



19. View of neighboring property southeast of subject site across Olive Street, southeasterly facing.

SITE PHOTO EXHIBIT
Site Address: 233 W. Washington Boulevard
Applicant: 233 West Washington, LLC



20. View of neighboring property northeast of subject site across Olive Street, northeasterly facing.

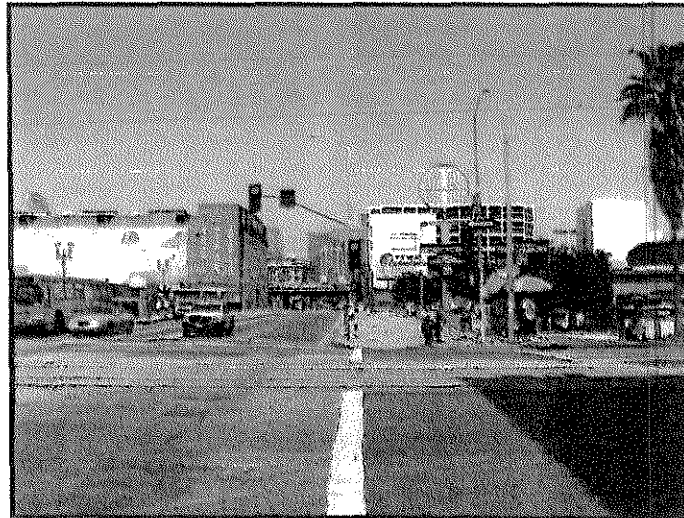


21. View of neighboring properties northeast of subject site, northwesterly facing.

SITE PHOTO EXHIBIT
Site Address: 233 W. Washington Boulevard
Applicant: 233 West Washington, LLC



22. View of Grand Avenue curb line, southwesterly facing from Washington Boulevard.

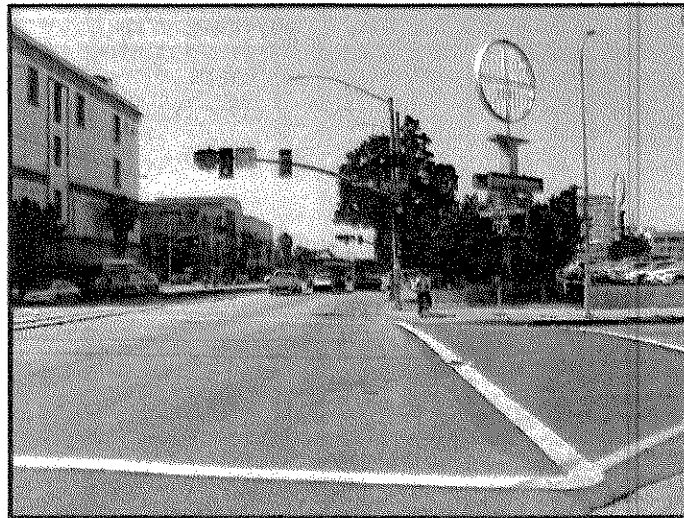


23. View of Grand Avenue curb line, northeasterly facing from Washington Boulevard.

SITE PHOTO EXHIBIT
Site Address: 233 W. Washington Boulevard
Applicant: 233 West Washington, LLC



24. View of Washington Boulevard curb line, southeasterly facing from Grand Avenue.

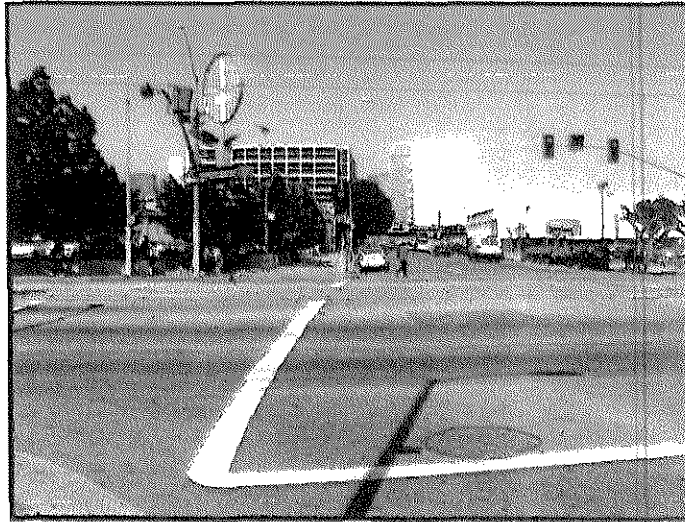


25. View of Washington Boulevard curb line, northwesterly facing from Olive Street.

SITE PHOTO EXHIBIT

Site Address: 233 W. Washington Boulevard

Applicant: 233 West Washington, LLC



26. View of Olive Street curb line, northeasterly facing.



27. View of Olive Street curb line, southwesterly facing.

