FINDINGS
As Amended by the Central Area Planning Commission on February 26, 2018

SPECIFIC PLAN EXCEPTION FINDINGS

1. **That the strict application of the regulations of the specific plan to the subject property would result in practical difficulties or unnecessary hardships inconsistent with the general purpose and intent of the specific plan**.

Setback Standards

The strict application of the regulations of the specific plan result in difficulties and hardships inconsistent with the general purposes and intent of the Central City West Specific Plan ("CCWSP"). Having a multi-zoned site in conjunction with the setback, landscaping, slope, and street improvement requirements create practical difficulties for the construction of a high-density mixed-use development in an urban area where lot size and the high cost of construction result in constraints on project development. The Applicant is requesting reduced setbacks in order to accommodate the proposed project.

Exceptions from the CCWSP are necessary to achieve the underlying purpose of providing flexibility especially for larger sites, as shown below:

P. Promote increased flexibility in the design of a large site in order to ensure a well-planned combination of commercial and residential uses with adequate open space.

R. Provide for more flexibility and precision in the regulation of the height and bulk of buildings.

The following setbacks for each building of the project are requirements of the LAMC as deferred by the CCWSP.

South Building

The CCWSP zoning of the South Building is C2(CW)-U/6 and C4(CW)-U/4.5, which requires compliance with LAMC Section 12.16 ("C4" Commercial Zone) and LAMC Section 12.14 ("C2" Commercial Zone). LAMC Section 12.16.C provides: *that a front yard is not required, nor are side and rear yards for buildings erected and used exclusively for commercial purposes*. Additionally, LAMC Section 12.22.A.18.c.3 permits the portions of buildings used exclusively for residential uses to be exempt from the yard requirements for the portions of the buildings that abut a street, private street, or alley, if the first floor of such buildings at ground level is used for commercial uses or access to the residential portions of such buildings. Consistent with these provisions, the portions of the South Building facing 6th street, Bixel Street and the alley would observe 0'0" setback, and the west property line (which does not abut a street, private street or alley) would be required to provide setbacks.

The west property line has been designated by the Department of Building and Safety as a rear yard and would, thus, require a 19-foot setback. While this large setback standard is more appropriate for low-density structures, such as single-family homes that have usable yards directly accessible to each home, it does not provide the same benefit to midrise, high density, multiple residential structures with multiple floors that lack direct access to the setback space, resulting in an unnecessary hardship to projects that would provide much needed housing and commercial opportunities in areas of the Specific Plan that encourage such uses.

Unique features of the project include open balconies, structural setbacks above the lower levels, and an open entry courtyard that is heavily landscaped, all of which provide a visual break in the building, reducing the impact of the reduced setback. The South Building's rear yard would abut a commercial building that does not need a buffer from adjacent residential uses. As such, the reduced setback would be compatible with surrounding uses.

North Building

As the North Building is entirely residential with no street level commercial floor area, 16-foot setbacks are required based on the R4 Zone for rear yard adjacent to the alley, 5-foot setbacks for side yards facing the west and east property lines, and 15-foot setbacks for the R3 Zone for the front yard. However, the proposed reduction of the front yard setback on 5th Street would be justified as the residential "stoop" units at the street level would have landscaping and a deck area designed to fit each unit, in conjunction with street trees within a planting strip at the curb. The street wall of the building would be setback at least 8 feet from 5th Street.

A reduction of the setbacks for the two side yards fronting on the south and north property lines of the North Building is justified because the west-facing wall would adjoin a blank wall from the adjacent commercial building and surface parking lot. The east facing yard faces a 2-level parking structure. If setbacks were to be included along these property lines it would become dead space and serve no purpose in a high-density residential and mixed-use neighborhood, preventing a well-planned, integrated project, resulting in an unnecessary hardship.

In order for the Applicant to provide a well-planned project with a creative design, this request for reduced setbacks is necessary.

These setback requirements also have financial impacts that create additional unnecessary hardships on the project. As a result if the setbacks are applied in order to achieve the same floor area and density, the building may have to be constructed taller in order to create a sufficient density. There are substantial cost increases associated with developing a taller building, such as costs associated with a steel high-rise structure. The result is that much needed housing would either not be constructed or if it were constructed, higher rents would be necessary to cover increased construction costs. To impose the required setbacks would result in a project that is out-of-scale with the prevailing setbacks of existing development, and the unnecessary hardship of reducing building area would render a project that is financially infeasible to implement without passing those costs onto future renters.

For the reasons stated above, the strict application of the regulations of the CCWSP would result in practical difficulties or unnecessary hardships inconsistent with the general purpose and intent of the specific plan.

Street Standards

The street standards set forth in the CCWSP designate 5th Street as a Modified Collector Street that requires a 75-foot right-of-way and 56-foot roadway width. The City Council adopted the Mobility Plan 2035, which is a revision to the General Plan Transportation Element, on August 11, 2015[1], that revises the street designations for many streets in the

[1] Note: City Council rescinded amendments to the Plan on November 25, 2015. Council File Number 15-0719-S11

city. In this instance, the Mobility Plan designates 5th Street as a Collector Street with a required 66-foot right-of-way and 40-foot roadway width. Currently, the right-of-way is 60 feet, and the roadway is 40 feet. An 8-foot dedication would be required to meet the CCWSP right-of-way standards. However, the Mobility Plan would only require a 3-foot dedication to meet the new standards.

The Applicant is requesting that an exception be granted so that a 3-foot dedication can be made consistent with Mobility Plan requirements. Implementation of the CCWSP right-of-way standards would result in an unnecessary hardship for a street designation that is no longer feasible, as 5th Street terminates at Bixel Street and Lucas Avenue.

2. **That there are exceptional circumstances or conditions applicable to the subject property involved or to the intended use or development of the subject property that do not apply generally to other property in the specific plan area.**

Setback Standards

The area surrounding the project site was developed primarily before adoption of the CCWSP in 1991 and its amendment in 2009. There is a general mix of older office and commercial buildings that are 1- and 2-stories in height. The land use and zoning redesignated the entire area covered by the CCWSP area to a uniform pattern of taller commercial properties closer to the 110 Freeway, stepping back to the west to low-rise buildings that have more high density residential land use and zoning. Current development trends have resulted in more mixed-use projects that have utilized the commercial zoning together with its reduced setbacks in order to maximize the residential portions of a project.

Due to the unusual configuration of the site (i.e., sloping site from 5th Street to 6th street, location of an alley which separates the two main structures) and the 3 zoning designations, the strict application of the regulations of the Specific Plan creates exceptional circumstances not applicable to other properties and would result in dead space on the project site which would not provide any practical benefits to either the project site or adjoining properties.

The required side yard of the South Building and the rear yard facing the alley have little value and no practical purpose to a medium rise building that has its own amenities, landscaping, and courtyards that provide visual relief to the neighborhood and project residents. There are no blank walls that would overlook adjacent properties and the building heights would not overpower smaller adjacent existing structures. Furthermore, alleys typically serve as driveways for service vehicles, deliveries, and parking access and are not used for open space, recreation, or a buffer for adjacent properties and setbacks would not be necessary for these purposes. The 20-foot wide separation created by the alley right-of-way would serve for light and air circulation between the North Building and South Building but not have much aesthetic value to the rear service spaces of the buildings. Any additional separation would serve little purpose in a high-density, mixed-use development. As such, granting the reduced setbacks would result in a better project that is consistent with the intent of the Specific Plan.

The challenging configuration of the project's 2 off-centered building sites on sloping terrain separated by an alley are constraints that most other sites in the vicinity do not have. The North Building setbacks are not necessary due to the exceptional conditions of (1) the project borders itself on each side of the alley (North Building and South Building are separated by an alley) and (2) the project is surrounded by parking lots with the South Building bordering

a parking lot to the west and the North Building bordering a parking lot to the East. As there are no sensitive uses and there are no residential uses existing or planned adjacent to the Project site, there are exceptional circumstances that do not apply to other properties and these conditions justify granting of the exceptions. This offset nature of the project site does not allow the building design to achieve the required setbacks without increasing the height.

Therefore, the unusual site configuration, the alley separation of the project, the lack of necessity of protecting adjacent land uses, and costs associated with constructing a taller building that includes the setbacks required by the Specific Plan, are exceptional circumstances that do not apply to other properties in the CCWSP and justify the requested setback exception. The project provides architectural interest to the community with articulated walls, creative architectural features, landscaped courtyards (exceeding the open space requirement), and decks visible from surrounding properties and is compatible with other buildings in the area in massing, setbacks and articulation.

Street Standards

The exceptional circumstances for street standards are related to the adoption of the Mobility Element that requires a greater right-of-way of 66 feet, which is greater than the 60-foot right-of-way that presently exists on 5th Street. It should be noted that state law requires a Specific Plan to be consistent with the General Plan, including all associated elements, such as the Mobility Element. The exceptional circumstance in this case is that the City has not yet updated the Specific Plan to make it consistent with the General Plan. The Applicant would be required to dedicate 3 feet to meet the new Mobility Element standard. As it is highly unlikely that the other properties on 5th Street would comply with the out-of-date standards in the CCWSP since 5th street now terminates at both Bixel Street and Lucas Avenue, there are exceptional circumstances justifying that the maximum dedication be no greater than the 3 feet set forth in the Mobility Element.

3. **That an exception from the specific plan is necessary for the preservation and enjoyment of a substantial property right or use generally possessed by other property within the specific plan area in the same zone and vicinity but which, because of special circumstances and practical difficulties or unnecessary hardships is denied to the property in question**.

Setback Standards

The exceptions are necessary for the preservation and enjoyment of a use generally possessed by other property in the same zone. In this portion of Los Angeles, many existing buildings occupy their entire site. The project design complements the positive characteristics of the surrounding existing uses, while serving as a visual transition to the areas of the Financial District and South Park, which have seen major redevelopment within the past decade.

The project site is currently developed with minimal setbacks and has existed for many years without significant impacts to the surrounding neighborhood and adjacent property. Approximately one-half of the 5th Street frontage is bordered by commercial zones that are typically not required to provide setbacks for commercial/mixed-use developments. The zoning on the south side of 6th Street, immediately across from the project, includes a C4 designation that would not require setbacks for a similar mixed-use project. Under Case No. DIR-2008-3407-SPP-SPPA-DB, this C4 zoned site was approved for the development of 648 residential units and 39,989 square feet of commercial uses.

Similar projects in the immediate vicinity of the project and subject to the same requirements of the LAMC and CCWSP have been granted reduced yard setbacks. For example, the property located immediately across 5th Street from the project was granted zero-foot front and side yards under Case No. APCC 2005-2155-SPE-ZAD-SPP for an 84 unit residential development in the C4 and R5 zones. Case No. APCC 2006-1300-SPE-SPP was approved with a zero-foot rear yard and other reduced yards along the alley and St. Paul Street frontage.

Additionally, the South building would be required to provide a 19-foot setback along the westerly property line. Such a setback is a practical difficulty for a high-density neighborhood with a mix of commercial and residential land use and zoning. This type of residential setback is required by the R4 zoning. However, this standard is one that is more typically suited for lower density zones where the separation of low density residential uses is more critical to expected privacy. The project is proposing decks, articulations, architectural details, courtyards, and other landscaped areas visible from the exterior of the structures that breakup blank walls, and avoid a box-like design that the might otherwise result from the underlying zoning. The requested zero-foot rear yard along the Property line is consistent with existing high-density, mixed-use projects in this area of the CCWSP.

By bringing the ground floor commercial to the property line, the project would enhance the pedestrian orientation of the project, providing pedestrians with views into an active building along the street frontage. Given the unique qualities of the size – irregular shape, slope, and multiple zone designations, coupled with the project's location along a stretch of the street that contains similar uses, the reduction of yards would allow for the development of a much needed mixed-use development.

Therefore, the development trends and approvals in the project vicinity have provided that there are practical difficulties and unnecessary hardship that justify the requested reduced setbacks that are consistent with these previous approvals.

Street Standards

The special circumstances would preserve a property right generally enjoyed by the other property owners on 5th Street, which would result in unnecessary hardship to the project by requiring an 8-foot dedication under the CCWSP. Other properties on 5th Street do not have to make any dedication at this time. Once the CCWSP has been updated to reflect the street standards of the Mobility Plan 2035, the Applicant would only have to dedicate 3 feet. A practical difficulty would result if a full 8 feet were required for dedication. This would result in an unnecessary hardship in that the CCWSP standards and required dedications would increases the required dedication of a street that is being redesignated to a reduced right-of-way and ends at Lucas Street, which only needs a minimal right of-way to serve the residents and the few businesses on this limited street.

4. **That the granting of an exception will not be detrimental to the public welfare or injurious to the property or improvements adjacent to or in the vicinity of the subject property.**

Granting of the exceptions would not be detrimental to the public welfare, injurious to property or improvement to property in the surrounding neighborhood. On the contrary, the project would result in a significant improvement and benefit to the neighborhood by revitalizing commercial property and an underutilized parking garage by providing a well-designed and

contemporary, mixed-use building with more than the required open space and code required off-street parking. In addition, the project would provide much needed housing and neighborhood serving commercial uses. The granting of the exception to allow for reduced yards adjacent to an existing parking structure and along an alley would not be detrimental to the public welfare or injurious to property or improvements in the vicinity of the project site. While the request is for zero setbacks, the actual structures are not proposed to be built to the property line at the above-ground levels.

Most existing buildings in the surrounding commercial and residential zones are built to the property line. Historically, commercial streets have been developed with buildings built to the property line in order to promote pedestrian activity. By orienting the commercial uses on a main commercial thoroughfare along 6th Street, the project would create an inviting and pedestrian friendly environment. Thus, the approval of this request would allow for a development that is consistent with the surrounding community.

The project would enhance the neighborhood by providing a significant residential development that brings with it neighborhood-serving commercial uses and residential units in a location that provides the opportunity to live near a large employment center in the Central City.

The design and location of the proposed project would enhance the surrounding neighborhood by providing jobs and housing, being conveniently located near the Downtown area, a major jobs center in the city, in conformance with the following CCWSP Purposes:

G. Provide for an improved jobs/housing ratio over that which would otherwise have occurred, through the requirement that housing be constructed commensurate with commercial Projects.

H. Create new mixed-use residential/commercial land use categories, in order to locate housing closer to jobs, reduce vehicle miles travelled and improve air quality.

O. Provide for an expanded and enhanced relationship to the Central Business District and the greater downtown area.

Therefore, granting of an exception to the setbacks would not be detrimental to the public welfare or injurious to the property or improvements adjacent to or in the vicinity of the project site. The project would provide much needed housing and jobs, resulting in a significant improvement to previous uses of the project site.

Street Standards

The granting of the exception to make the street right-of-way for 5th Street as set forth in the CCWSP to be consistent with the Mobility Element would not be detrimental to the public welfare or injurious to the property or improvements adjacent to or in the vicinity of the project site. The City has determined that the Transportation Element of the General Plan should be amended and has, therefore, adopted the Mobility Element, which establishes new standards, including revised rights-of-ways dimensions for streets throughout the City, including the CCWSP. In this instance, the right-of-way for 5th Street is revised to reduce the amount of land needed for this street for new development, which in turn would add to the public welfare by higher-density uses, thereby creating more housing and/or jobs, instead of for unnecessary street improvements. Therefore, there is no detriment or injury to property or improvements adjacent to or in the project vicinity, as the setbacks are compatible with other properties adjacent and near to, the project site.

5. **That the granting of an exception will be consistent with the principles, intent and goals of the specific plan and any applicable element of the general plan.**

Setback Standards

The granting of the exception to allow for reduced yards would be consistent with the principles, intent, and goals of the CCWSP and the General Plan.

The subject Property is located within the area covered by the Westlake Community Plan, for which zoning is set forth in the CCWSP area, which designates the property's zoning and land use as C4(CW)-U/4.5 (Regional Commercial), C2(CW)-U/3 (Community Commercial) and R5(CW)-U/6 (High Density Residential).

The Specific Plan

The proposed Project is in substantial conformance with the following goals contained in the "Purposes" section of the CCWSP:

> ***Section 2.B.*** *Establish a complete 24-hour community for all segments of the population, with jobs and housing, needed public facilities, recreation/entertainment and amenities, open spaces and pedestrian oriented places.*

The proposed mixed-use project would provide much needed housing opportunities for those who work in the adjacent Downtown area, the commercial core of the City. Housing typically is the catalyst in creating and expanding commercial and retail services in a given area. In mixed-use developments, businesses usually extend their hours in order to accommodate those who live in the area and within the development, thus giving rise to a more vibrant and safer community. The commercial environment of Downtown would prove attractive to potential new residents, and in turn more recreational, entertainment, and shopping opportunities should arise for a growing community. The project is in proximity to the commercial core of the City, and residents are within easy walking distance of many Downtown office buildings. Furthermore, with the project's location near Wilshire Boulevard, residents have easy access to a number of public transit alternatives, including the Metro Rapid Bus and subway systems. It is anticipated that in addition to driving, residents of the project would walk or use public transit, thereby creating a more pedestrian oriented neighborhood.

> ***Section 2.C.*** *Regulate all development including use, location, height and density to ensure compatibility of uses, and to provide for the consideration of transportation and public facilities, aesthetics, historic preservation, open space and the economic and social well-being of area residents.*

The project consists of residential and commercial uses that are compatible with existing and future uses in the Specific Plan area. By replacing two commercial office buildings and a parking structure, the project would enhance the physical character and stimulate economic activity and investment in the surrounding neighborhood. The availability of public transportation and the pedestrian-friendly nature of the community would assure the social well-being of area residents because they would have easy access to the jobs, culture, and entertainment opportunities widely available in the Downtown area.

> ***Section 2.D.*** *Protect the existing residential community from further displacement, replace*

dwelling units previously removed from the Specific Plan area, and provide new housing in proportion to the need, by household size and income, associated with the existing community and new jobs generated in the Plan area.

The existing buildings and parking structure have consistently been used for offices and parking, hence no dwelling units would be lost or displaced as a result of the project. The project addresses housing needs in a range of household sizes and incomes. Moreover, with the jobs rich environment of the Downtown commercial core, there is high demand for housing in the area. Other projects are being developed within the existing Westlake community to provide for similar types of housing, creating a more vibrant residential community for the area. Furthermore, the greater availability of housing in the area will be a catalyst in generating jobs in the CCWSP and Westlake Community Plan areas.

Section 2.G. *Provide for an improved jobs/housing ratio over that which would otherwise have occurred, through the requirement that housing be constructed commensurate with commercial Projects.*

By replacing two commercial office buildings and a parking structure with a mixed-use development, the project proposes to improve the jobs/housing balance within the greater vicinity. The Downtown commercial core, which is proximate to the subject site, is a major source of jobs in Los Angeles. However, the Downtown area lacks the appropriate jobs/housing ratio due to the presence of many high-rise office buildings that lack residential housing facilities in close proximity. Construction of 369 residential units helps to provide housing that is commensurate with commercial projects in the area.

Section 2.H. *Create new mixed use residential/commercial land use categories, in order to locate housing closer to jobs, reduce vehicle miles traveled and improve air quality.*

By replacing two commercial office buildings and parking structure, with residential dwelling units and neighborhood commercial, this project fulfills the purpose of the CCWSP to create a hybrid of residential and commercial land uses. With the major employment center of nearby Downtown Los Angeles, new residents would also be able to access many businesses. The use of nearby public transit or the ability to walk to Downtown allows for a significant reduction in vehicle miles traveled, and subsequently, will improve local air quality.

The Community Plan

The Westlake Community Plan also contains applicable principles and goals for residential development embodied in the "Community Issues and Opportunities" section:

Access and proximity to employment for community residents;

The project is providing housing in close proximity to Downtown employment and entertainment opportunities, with access to the job market easily accessible by walking or public transit.

Potential for residential and mixed-use development along Commercial Corridors;

The project would create commercial and residential uses near the commercial corridor of Wilshire Boulevard, as well as 6th Street where new housing and commercial businesses are being developed and where public transit offers easy access to the Downtown area.

Provide for a variety of housing opportunities by income, with an emphasis on the creation of middle-income neighborhoods, especially targeted for downtown workers.

New residential developments have emerged in the neighborhood. The project is designed for a variety of income levels that can take advantage of the nearby commercial core job market of Downtown Los Angeles.

The Land Use Plan Policies and Programs section of the Westlake Community Plan contains several Objectives and Policies with which the project is also consistent:

To designate a supply of residential land adequate to provide housing of the types, sizes, and densities required to satisfy the varying needs and desires of all segments of the community's population.

The Applicant proposes to create 369 dwelling units from what is currently two underutilized office buildings and a parking structure. These new units would provide a supply of various types and sizes to meet the needs of a diverse group of potential residents. These units would satisfy the varying needs and desires of different income groups within the community's population. Due to its location near Downtown, the project is likely to attract a wide range of households seeking proximity to other businesses and cultural and entertainment attractions, in a vibrant urban center with a multitude of employment and entertainment opportunities.

To improve the compatibility between commercial and residential uses.

The project contains 369 dwelling units and 22,000 square feet of neighborhood-serving commercial floor area, which combines both commercial and residential uses into one cohesive development. Living in the urban environment of Downtown Los Angeles affords the residents easy access to other businesses and commercial opportunities. This project site is within convenient walking distance to many businesses and other residential properties within the surrounding area.

The Housing Element of the General Plan

The 2013-2021 Housing Element provides the assessment that the City of Los Angeles is "facing an unprecedented housing crisis," and this crisis impacts all segments of the housing market. The Housing Element notes that for over 20 years the City has been "pursuing a sustainable approach to accommodating long-range growth," and that this approach is established in the Framework Element of the General Plan, which "encourages sustainable growth in higher- intensity commercial and mixed-use districts, centers and boulevards, and in proximity to transit." The Executive Summary of the Housing Element notes "the primary goal of the Housing Element is to provide a range of housing opportunities for all income groups." The Housing Element calls for a yearly production of 10,250 housing units, which is significantly greater than the approximately 6,000 units annually generated, on average, from 2006 through 2012 (the period preceding the 2013-2021 focus of the current Housing Element), as identified in the Housing Element's Regional Housing Needs Assessment.

The Housing Element notes that in 2006 the City issued permits for 13,276 units. The pace of development fell to a low of 2,093 housing permit in 2009. By any reasonable objective measure, the needed amount of housing to accommodate growth is not being achieved.

The need for more housing is a primary issue for the 2013-2021 Housing Element, which notes in its Executive Summary that the City's General Plan Framework Element lays out the strategy to meet the challenges of accommodating residential growth by *"encouraging sustainable growth in higher-intensity commercial and mixed-use districts, centers and boulevards, and in proximity to transit."* The project achieves this smart growth objective by locating its density near the transit corridor of Wilshire Boulevard and in close proximity to the job-rich center of Downtown Los Angeles. The project delivers the type of housing needed and encouraged by the Housing Element.

The construction of the 369 dwelling units is consistent with the principles, intents and goals of the CCWSP, the Community Plan and the Housing Element of the General Plan.

Street Standards

The granting of the exception to CCWSP to allow for the right-of-way of 5th Street is to be consistent with The Mobility Plan standards. Therefore, the principals, intent, and goals of the General Plan and CCWSP are met.

SPECIFIC PLAN PROJECT PERMIT ADJUSTMENT FINDINGS

LAMC Sec. 11.5.7E Findings. The Director shall grant a Project Permit Adjustment upon a written finding that the project satisfies each of the following requirements, in addition to any other required specific plan findings that may pertain to the Project Permit Compliance:

1. **That there are special circumstances applicable to the project or project site which make the strict application of the specific plan regulation(s) impractical.**

   Density Averaging

   The project would consist of 2 mid-rise buildings with integrated underground parking under each that would be consistent with existing and new development that is changing the neighborhood from underutilized parking lots and commercial buildings into a vibrant mixed-use residential area. The project is located in a neighborhood that is ideally suited to provide housing for those who are employed near the Central City of Los Angeles. The project is located near a growing entertainment center and major jobs center just east of the 110 freeway.

   The South Building of the project is a single integrated building combining access, parking, residential uses, and neighborhood-serving retail that straddles 2 zones: C4(CW)-U/4.5 and C2(CW)-U/3. The C4(CW)-U/4.5 zoned portion allows up to 172,705.5 square feet of floor area and generates a base density of 191 dwelling units within its lot area (permitted density is R5 Density of 1 unit per 200 SF of lot area). The C2(CW)-U/3 zoned portion allows up to 43,200.0 square feet of floor area and generates a base density of 36 dwelling units within its lot area (permitted density is R4 density of 1 unit per 400 SF of lot area). Total base density for the C4(CW)-U/4.5 and C2(CW)-U/3 zoned portions is 227 dwelling units. The Applicant is requesting a Specific Plan Project Permit Adjustment to average the permitted density and floor area within the South Building portion of the site, so that the C4(CW)-U/4.5 zoned portion has 173 dwelling units and the C2(CW)-U/3 zoned portion has 54 dwelling units, for a total of 227 dwelling units.

The granting of the floor area and density averaging will result in a seamless development of the structures located in each zone facing 6th Street so that the external architecture is consistent and the floors that connect the residential units have easy access to the various amenities for internal consistently. The averaging of floor area and density between the south parcels is necessary to create a fully integrated and well-balanced mixed-use building, with shared facilities, open space and amenities.

Open Space

The applicant is requesting a Specific Plan Adjustment to reallocate permitted open space within the entire project. The project site is unique in that it consists of 2 buildings, separated by an alley, and fronting on 3 streets. The North Building that will front on 5th Street will be entirely residential with associated parking. Open space and common area amenities will be distributed throughout this building in a variety of locations and configurations. The project is proposing street level private decks; a clubhouse, pool, and courtyard open to the sky on the second floor; and sky deck on the seventh floor.

The South Building will have comparable open space and amenities, as well as retail on the ground floor. The project is proposing an outdoor plaza on the first floor; multiple courtyards, including a pool and clubhouse on upper floors, and a sky deck on the seventh floor.

The proposed amenities are designed for the benefit of all the residents and visitors to the project site (for both buildings), to be made accessible by a foot bridge between buildings. As a result, the design gives an open feeling that avoids the boxlike structure of so many residential structures that are built out to the cover every square foot possible. The creative design on the project results in a design that maximizes the location and variety of open space and allows for the open-air feeling. Openness of the design allows more light and air to the residential units in a manner that benefits residents while providing for the optimum number of dwelling units.

2. **That in granting the Project Permit Adjustment, the Director has imposed project requirements and/or decided that the proposed project will substantially comply with all applicable specific plan regulations**.

Density Averaging

Specific Plan

The granting of the requested floor area averaging would be consistent with the principles, intent, and goals of the CCWSP and with the General Plan. The granting of the floor area averaging would allow for a creatively designed, seamless structure that would complement the neighborhood and provide much needed housing. The construction of new residential units is a major emphasis of the CCWSP, an objective of the Westlake Community Plan, and would be consistent with the objectives of the City's Housing Element.

The project is in substantial conformance with the following goals contained in the "Purposes" section of the CCWSP:

> ***Section 2.B.*** *Establish a complete 24-hour community for all segments of the population, with jobs and housing, needed public facilities, recreation/entertainment and amenities, open spaces and pedestrian oriented places.*

The mixed-use project would provide much needed housing opportunities for those who work in the adjacent Downtown area, the commercial core of the City. Housing is often the catalyst for creating and expanding commercial and retail services in a given area as there is a need for housing near jobs. Because "residential" is a 24-hour use, businesses usually extend their hours in order to accommodate those who live in the area, thus giving rise to a vibrant, safer community. The commercial environment of Downtown would prove attractive to new residents, and in turn more recreational, entertainment and shopping opportunities should arise in the Specific Plan area for a growing community. The project is in close proximity to the commercial core of the City, and residents are within easy walking distance of many Downtown office buildings. Furthermore, with the project's location near Wilshire Boulevard, residents have easy access to a number of public transit alternatives, including the Metro Rapid Bus and subway systems. It is anticipated that residents of the project would walk or use public transit, thereby creating a more pedestrian oriented neighborhood.

Section 2.C. *Regulate all development including use, location, height and density to ensure compatibility of uses, and to provide for the consideration of transportation and public facilities, aesthetics, historic preservation, open space and the economic and social well-being of area residents.*

The project consists of residential and commercial uses that are compatible with existing uses in the community. By replacing the existing commercial buildings and parking structure, the project would also assist in improving the project site. In turn, by enhancing the physical character of the area and by stimulating economic activity and investment in the area. The availability of public transportation and the pedestrian-friendly nature of the community would assure the social well-being of area residents because they would have easy access to the jobs, culture and entertainment opportunities widely available in the Downtown area.

Section 2.D. *Protect the existing residential community from further displacement, replace dwelling units previously removed from the Specific Plan area, and provide new housing in proportion to the need, by household size and income, associated with the existing community and new jobs generated in the Plan area.*

The existing buildings and parking structure have always been used as commercial buildings and parking, thus no dwelling units would be lost or displaced as a result of the project. The project addresses housing needs in a range of household sizes and incomes. Moreover, with the jobs rich environment of the Downtown commercial core, there is high demand for the type of residential units contemplated in the project. Other projects are being developed within the Westlake community to provide for similar type of housing, creating a vibrant residential community. Furthermore, the greater availability of housing in the area is certain to have a positive impact on jobs generated in the CCWSP area.

Section 2.G. *Provide for an improved jobs/housing ratio over that which would otherwise have occurred, through the requirement that housing be constructed commensurate with commercial Projects.*

By replacing two commercial office buildings and a parking structure into a mixed-use development, the project proposes to improve the jobs/housing balance within the greater vicinity. The Downtown commercial core, which is proximate to the subject site, is a major source of jobs in Los Angeles. However, the Downtown area lacks the appropriate

jobs/housing ratio due to the presence of many high-rise office buildings that lack residential facilities. The construction of 369 dwelling units helps to provide housing that is commensurate with commercial projects in the area.

Section 2.H. *Create new mixed use residential/commercial land use categories, in order to locate housing closer to jobs, reduce vehicle miles traveled and improve air quality.*

By replacing two commercial office buildings and parking structure with residential dwelling units and neighborhood-serving commercial, the project fulfills the purpose of the CCWSP to create a hybrid of residential and commercial uses. With the major employment center of nearby Downtown Los Angeles, new residents would also be able to access many of the businesses. The use of public transit or the ability to walk to Downtown allows for a significant reduction in vehicle miles traveled, and subsequently, to the improvement of local air quality.

The project as proposed complies with the regulations of the CCWSP; including the requested variations. Averaging floor area would permit the South Building to be efficiently designed, configured, and constructed with 168,812.2 square feet located in the C4(CW)-U/4.5 Zone and 47,068.2 square feet in the C2(CW)-U/3 Zone.

Notwithstanding floor area averaging, the building would still comply with height limitations for each zone, and the South Building would still be less than the maximum floor area permitted on the project site. The proposed South Building floor area is 215,880.4 square feet, and 215,905.5 square feet is permitted. The Applicant is requesting to move 3,868.2 square feet of floor area from the C4(CW)-U/4.5 Zone to the C2(CW)-U/3 Zone.

The structure would not shade or overpower any other buildings fronting on 6th Street. The design would appear seamless and would have a uniform pattern across the 2 zones.

Open Space

The project as designed would substantially comply with goals and intent of the CCWSP. The project provides a variety of open space amenities that are distributed throughout both structures that exceeds the City's minimum requirement, is satisfying the parking requirements, and provides a mixed-use development that provides many residential opportunities.

3. That in granting the Project Permit Adjustment, the Director has considered and found no detrimental effects of the adjustment on surrounding properties and public rights-of-way.

Density Averaging

Granting the Adjustment would not result in any detrimental effects on surrounding properties. The averaging would shift a portion of the South Building's floor area from the C4 zone with the 4.5:1 FAR to the C2 zone with a 3.0:1 FAR. The overall building would be a balanced design that is a continuous structure without a "stair-step" effect that would cause the floors between the two portions of the buildings located in each zone to be on 2 different planes if the averaging was not granted. The C4 zone floor area would be slightly reduced and the C2 Zone floor area would be slightly increased. Furthermore, the amount of dwelling units in the C4 zoned portion (173) would be slightly less than the amount otherwise permitted without

the Adjustment (191), and the amount of dwelling units in the C2 zoned portion (54) would be slightly greater that the amount otherwise permitted without the Adjustment (36). Nevertheless, the project, as proposed, would not result in any increased floor area for the overall project, and the total amount of dwelling units (227) would equal the total amount permitted (227) for the South Building portion of the site. The increase in density between sites would not affect surrounding commercial properties.

Open Space

The Project provides a unique design in which street levels are designed with varied facades, ample landscaping, street trees, landscaped street level decks and landscaped mezzanine levels that are all visible from the surrounding properties that will enhance the surrounding neighborhood.

4. **That the project incorporates mitigation measures, monitoring of measures when necessary, or alternatives identified in the environmental review, which would mitigate the negative environmental effects of the project, to the extent physically feasible.**

Density Averaging and Open Space

In compliance with requirements of the California Environmental Quality Act ("CEQA"), the project would comply with mitigation measures for environmental impacts set forth in the Mitigation and Monitoring Program for ENV-2015-3033-EIR (SCH# 2016031029) as shown in Exhibit B of this report.

PROJECT PERMIT COMPLIANCE FINDINGS

Findings Pursuant to LAMC Sec. 11.5.7C and CCWSP Sec. 17.A2. The Director shall grant a Project Permit Compliance upon written findings that the project satisfies each of the following requirements:

1. **That the project substantially complies with the applicable regulations, findings, standards and provisions of the specific plan.**

Land Use

The project site consists of 3 zones: the North Building lots fronting on 5th Street are zoned R5(CW)-U/6 and permit residential development at the R5 density; and the South Building zones include C2(CW)-U/3 and C4(CW)-U/4.5, which are both commercial zones. The C2 zone permits commercial uses, mixed uses, and multiple residential uses up to an R4 density and the C4 zone permits commercial uses, mixed uses, and multiple residential uses up to an R5 density when in a Redevelopment area.

The North Building is proposed to be developed with 142 dwelling units and the South Building is proposed to be developed with 227 dwelling units and 22,000 SF of commercial uses.

The project requires Project Permit compliance for a total of 369 dwelling units, and 22,000 square feet of commercial space, consistent with the development of CCWSP uses and density as permitted in these zones.

Building Height

The South Building lots are located in the C2(CW)-U/3 zone, which permits a maximum height of 1,218 feet above mean sea level with a maximum FAR of 3:1, and the C4(CW)-

U/4.5 zone, which permits maximum height of 1,218 feet above mean sea level and an FAR or 4.5:1. The maximum height of the South Building is approximately 91 feet 11 inches per LAMC and approximately 452 feet above mean sea level, which is well within this requirement. Building appurtenances such as stairways and elevator shafts may be permitted pursuant to LAMC Section 12.21.1 B.3.

The North Building lots are located in the R5(CW)-U/6 zone within an area in CCWSP Section 8.A.3 that permits a maximum height of 1,218 feet above mean sea level with a maximum FAR of 6:1. The maximum height of the North Building is approximately 98 feet 2 inches per LAMC and 466 feet above mean sea level, which is well within this requirement. Building appurtenances such as stairways and elevator shafts may be permitted pursuant to LAMC Section 12.21.1 B.3.

Open Space / Landscaping

The CCWSP requires 150 square feet of open space per unit. Up to a maximum of 50 square feet per unit of the required open space may be provided as private open space. Of that amount 100 square feet per unit must be provided as common open space. The project is required to provide a total of approximately 40,675 SF of open space.

Approximately 24,600 square feet of open space is proposed at the South Building and approximately 16,075 square feet of open space is proposed at the North Building, meeting CCWSP requirements. Furthermore, an additional 8,525 square feet of uncredited open space is proposed at the South Building, and an additional 3,660 square feet of uncredited open space is proposed at the North Building. Open space at each building includes common areas and amenities such as courtyards, swimming pools, sky decks, lobbies, club house, and fitness centers.

The CCWSP requires 1 tree per residential unit. Per this standard, the project would be required to provide 369 trees. Of that amount 50% are required to be provided on-site. The project will provide 185 trees on-site. The remainder of the required trees will be planted off-site at locations to be approved by the Department of City Planning.

Automobile Parking

The CCWSP requires parking for uses other than office use to be provided per the LAMC. Parking for the North Building would consist of 139 residential spaces, and parking for the South Building would consist of 216 residential spaces and 35 commercial spaces. The project would require a total of 438 parking spaces. However, the project is requesting the bicycle parking incentive program, which would reduce the required automobile parking to 390 required parking spaces with the provision of 429 bicycle parking stalls.

2. **That the project incorporates mitigation measures, monitoring measures when necessary, or alternatives identified in the environmental review which would mitigate the negative environmental effects of the project, to the extent physically feasible.**

   In compliance with requirements of the California Environmental Quality Act ("CEQA"), the project would comply with mitigation measures for environmental impacts set forth in the Mitigation and Monitoring Program for ENV-2015-3033-EIR (SCH# 2016031029) as shown in Exhibit B of this report.

DIRECTOR'S DECISION FINDINGS:

Findings pursuant to LAMC Sec. 12.21 G.3(b). The Director of Planning shall have the authority to review and approve or disapprove all proposed landscape plans with a ten percent increase in the qualifying area of recreation rooms up to a maximum of 35% of the total required usable open

space. The Applicant is requesting a 10% increase in the qualifying area of recreation rooms (including interior amenities, such as a fitness center, club house, and lobbies) up to a maximum 35% of the total required usable space. The Director shall grant a Director's Decision upon written findings that the project satisfies each of the following requirements.

1. That the open space provided conforms with the objectives of this subsection.

Per LAMC Section 12.21.G.1, the Purpose of this subsection is as follows:

"[To] afford occupants of multiple residential dwelling units opportunities for outdoor living and recreation; provide safer play areas for children as an alternative to the surrounding streets, parking areas and alleys; improve the aesthetic quality of multiple residential dwelling units by providing relief to the massing of buildings through the use of landscape materials and reduced lot coverage; and provide a more desirable living environment or occupants of multiple residential dwelling units by increasing natural light and ventilation, improving pedestrian circulation and providing access to on-site recreation facilities."

The project meets the objectives of this subsection. The project will provide a total of 40,675 square feet of open space. Approximately 24,600 square feet of open space is proposed at the South Building and approximately 16,075 square feet of open space is proposed at the North Building. Open space at each building includes common areas and amenities as courtyards, swimming pools, sky decks, lobbies, club house, and fitness centers, which will provide a desirable living environment for occupants, increasing natural light and ventilation, improving pedestrian circulation and providing access to on-site recreation facilities.

2. That the proposed project complies with the total usable open space requirements.

LAMC Section 12.21.G requires usable open space for new developments with 6 or more dwelling units. Per LAMC Section 12.21.G, there shall be 100 square feet of open space provided for each residential unit having less than 3 habitable rooms; 125 square feet of open space provided for each residential unit containing 3 habitable rooms; and 175 square feet of open space provided for each residential unit containing more than 3 habitable rooms. The project requires a total of 40,675 square feet of open space for the proposed 369 dwelling units, including 24,600 square feet for the South Building and 16,075 square feet for the North Building.

Under LAMC Section 12.21.G.2.a.1, common open space standards are described, including that such space:

- Be open to the sky;
- Be readily accessible to all residents of the site;
- Have a minimum area of 400 square feet with no horizontal dimension less than 15 feet when measured perpendicular from any point on each of the boundaries of the open space area; and
- Constitute at least 50% of the total required usable open space in developments built at R4 and R5 densities.

A total of 22,644 square feet of the project's proposed open space (including 14,090 square feet at the South Building and 8,574 square feet at the North Building) meets LAMC Section 12.21.G.2,a(1) common open space standards. The project's open space exceeds the 50% minimum of required usable open space, with the 50% minimum requirement being 20,337.5 square feet.

LAMC Section 12.21.G.2,a(4) describes that recreation rooms of at least 600 square feet in area for a development of 16 or more dwelling units may qualify as common open space, but shall not qualify for more than 25 percent of total required usable space. The Applicant is requesting that approximately 14,236 square feet of recreation rooms (including interior amenities, such as a fitness center, club house, and lobbies), including 8,610 square feet at the South Building and 5,626 square feet at the North Building (for a total of 35% of the required 40,675 square feet of open space) be counted toward usable open space requirements.

Beyond the common open space and recreation rooms described above, the project also provides 3,775 square feet of private open space at unit balconies. Furthermore, an additional 8,525 square feet of uncredited open space is proposed at the South Building, and an additional 3,660 square feet of uncredited open space is proposed at the North Building. Uncredited open space includes indoor and outdoor, common and private open space.

Based on the above, and as shown in the table below, the project provides a total of 52,860 square feet of usable open space (including uncredited open space), which significantly exceeds the required total of 40,675 square feet and is consistent with the 50% minimum of required total space for common open space, as well as the requested 35% maximum of recreation room qualifying area. Thus, the project complies with total usable open space requirements.

Required and Provided Open Space				
Open Space Classification	**Amount Provided, to Count Toward LAMC Requirements**	**Percent Provided, to Count Toward LAMC Requirements**	**Total Amount Provided, Including Uncredited Open Space**	**Percent Provided**
Common Open Space (Open to Sky)	22,664.00 SF	55.71%	28,649.00 SF	54.20%
Recreation Rooms	14,236.00 SF	35.00%	14,236.00 SF	26.93%
Private Open Space	3,775.00 SF	9.28%	9,975.00 SF	18.87%
Total	**40,675.00 SF**	**100.00%**	**52,860.00 SF**	**100.00%**

5. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) FINDINGS

FINDINGS OF FACT (CEQA)

A. INTRODUCTION

The Environmental Impact Report (EIR) consisting of the Draft EIR and Final EIR, is intended to serve as an informational document for public agency decision-makers and the general public

regarding the objectives and components of the project. Sapphire Equity LLC, the "Applicant," or its successor, proposes the demolition of the existing structures on-site, which includes a three-level parking structure, one five-story commercial office and medical office building, and one four-story commercial office and medical office building, for the development of a residential and commercial mixed-use project. The Proposed Project would consist of the construction of two buildings (North Building and South Building) that would be connected by a footbridge spanning above the adjacent alleyway. The North Building would include 142 apartment units within seven levels and would front 5th Street. The South Building would include 22,000 square feet (sf) of ground-floor retail and 227 apartment units within six levels above the ground-floor retail and would front both 6th Street and Bixel Street. The Proposed Project would have a total of 369 residential apartment units and approximately 22,000 sf of ground-floor commercial space. The ground-floor commercial space may include retail, restaurant, coffee shop uses, and/or other uses permitted by the Central City West Specific Plan ("CCWSP"). The unit mix would include 193 studio units, 96 one-bedroom units, 56 two-bedroom units, and 24 three-bedroom units of varying sizes and configurations. Both buildings include seven stories above grade and two levels of subterranean parking. The elevation across the Project Site increases from south to north and west to east. The Proposed Project would provide required on-site vehicle and bicycle parking spaces pursuant to the LAMC. Open space courtyards and landscaping features are proposed throughout the Project Site which would include 16,075 sf of open space within the North Building property and 24,600 sf of open space within the South Building property for a total of 40,675 sf of open space on-site. In total, the Project would contain approximately 348,431 sf of floor area.

B. ENVIRONMENTAL DOCUMENTATION BACKGROUND

The Project was reviewed by the Los Angeles Department of City Planning (serving as Lead Agency) in accordance with the requirements of the CEQA. The City prepared an Initial Study in accordance with Section 15063(a) of the State CEQA Guidelines. Pursuant to the provisions of Section 15082 of the State CEQA Guidelines, the City then circulated a Notice of Preparation (NOP) to State, regional and local agencies, and members of the public for a 30-day period commencing on March 10, 2016. The purpose of the NOP was to formally inform the public that the City was preparing a Draft EIR for the Project, and to solicit input regarding the scope and content of the environmental information to be included in the Draft EIR.

The NOP included notification that a public scoping meeting would be held to further inform public agencies and other interested parties of the Project and to solicit input regarding the Draft EIR. The public scoping meeting was held on March 24, 2016, from 6:00 P.M. to 8:00 P.M. at 888 S. Figueroa Street, Suite 510, Los Angeles, CA 90017.

Written comment letters responding to the NOP were submitted to the City by public agencies and interested organizations. Comment letters were received from various public agencies. The NOP and NOP comment letters are included in Appendix A of the Draft EIR.

The Draft EIR evaluated in detail the potential effects of the Project. It also analyzed the effects of a reasonable range of four alternatives to the Project, including a "No Project" alternative. The Draft EIR for the Project (State Clearinghouse No. 2016031029), incorporated herein by reference in full, was prepared pursuant to CEQA and State, Agency, and City CEQA Guidelines (Pub. Resources Code Sec. 21000, et seq.; 14 Cal. Code Regs. Sec.15000, et seq.; City of Los Angeles California Environmental Quality Act Guidelines). The Draft EIR was circulated for a 47-day public comment period beginning on July 6, 2017, and ending on August 21, 2017. A notification of the release of the Draft EIR was published by the City in the Los Angeles Times newspaper notifying interested parties of the availability of the Draft EIR for the Project. This notice was also mailed to

government agencies, interested parties, entities that commented on the Draft EIR, and owners and occupants residing within 500 feet of the Project Site, as well as any individual or organization requesting notification. The notice included information on how to access the Draft EIR, which also included access on the City's website.

A Notice of Completion (NOC) was also submitted to the State Clearinghouse. Copies of the written comments received are provided in the Final EIR. Pursuant to Section 15088 of the CEQA Guidelines, the City, as Lead Agency, reviewed all comments received during the review period for the Draft and responded to each comment in Section III, Responses to Comments, of the Final EIR.

The City released a Final EIR for the Project on January 12, 2018, which is hereby incorporated by reference in full. The Final EIR is intended to serve as an informational document for public agency decision-makers and the general public regarding objectives and components of the Project. The Final EIR addresses the environmental effects associated with implementation of the Project, identifies feasible mitigation measures and alternatives that may be adopted to reduce or eliminate these impacts, and includes written responses to all comments received on the Draft EIR during the public review period. Responses were sent to all public agencies that made comments on the Draft EIR at least 10 days prior to certification of the Final EIR pursuant to CEQA Guidelines Section 15088(b). The Final EIR was also made available for review on the City's Department of City Planning website. Digital versions of the Final EIR were also made available at three libraries and the Department of Planning. Notices regarding availability of the Final EIR and the Notice of Public Hearing were sent to those within a 500-foot radius of the Project Site, as well as individuals who commented on the Draft EIR, attended the NOP scoping meeting, or provided comments during the NOP comment period.

A duly noticed public hearing for the Project was sent out for the Deputy Advisory Agency and Hearing Officer hearing, on behalf of the Area Planning Commission, and held on February 7, 2018.

The documents and other materials that constitute the record of proceedings on which the City's CEQA findings are based are located at the Department of City Planning, Los Angeles City Hall, Room 750, 200 N. Spring St. Los Angeles, CA 90012. This information is provided in compliance with CEQA Section 21081.6(a)(2).

C. FINDINGS REQUIRED TO BE MADE BY A LEAD AGENCY UNDER CEQA

Section 21081 of the California Public Resources Code and Section 15091 of the CEQA Guidelines require a public agency, prior to approving a project, to identify significant impacts of the project and make one or more of three possible findings for each of the significant impacts:

- "Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR. (State CEQA Guidelines Section 15091, subd. (a)(1))."
- "Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency. (State CEQA Guidelines Section 15091, subd. (a)(2))."
- "Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the

mitigation measures or project alternatives identified in the final EIR. (State CEQA Guidelines Section 15091, subd. (a)(3)).”

The findings reported in the following pages incorporate the facts and discussions of the environmental impacts that are found to be significant in the Final Environmental Impact Report (EIR) for the Project as fully set forth therein. Although Section 15091 of the CEQA Guidelines does not require findings to address environmental impacts that an EIR identifies as merely “potentially significant,” these findings nevertheless fully account for all such effects identified in the Final EIR for the purpose of better understanding the full environmental scope of the Proposed Project. For each environmental issue analyzed in the Draft EIR, the following information is provided:

- Description of Effects - A specific description of the environmental effects identified in the EIR.
- Project Design Features - Identified project design features or actions that are included as part of the Proposed Project.
- Mitigation Measures - Identified mitigation measures or actions that are required as part of the Proposed Project (numbering of the Mitigation Measures corresponds to the Mitigation Monitoring Program, which is included as Section IV of the Final EIR).
- Finding - One or more of three specific findings in direct response to CEQA Section 21081 and CEQA Guidelines Section 15091 as discussed in the previous paragraph.
- Rationale for Finding - A summary of the reasons for the finding(s).
- Reference - A notation on the specific section of the Draft EIR and Revised Draft EIR, which includes the evidence and discussion of the identified impact.

D. DESCRIPTION OF THE PROJECT

1. Project Location

The Project Site is located at 1324-1342 W. 5th Street, 1101-1135 W. 6th Street, and 517-521 S. Bixel Street in Los Angeles, California 90017. The Project Site is identified by the following Assessor Parcel Numbers (APNs): 5152001021, 5152001014, and 5152001023. The Project Site is located west of the Harbor (I-110) Freeway and west of Downtown Los Angeles.

The Project Site is an infill development site and is designated as a “transit priority area” as defined by CEQA (See P.R.C. § 21099) and pursuant to the Department of City Planning’s Zoning Information File ZI No. 2452, Transit Priority Areas (TPAs) / Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA. The Project Site is located within one-half mile from the Seventh Street Metro Center Station (at 7th Street and Flower Street). Additionally, the Project Site is within 0.75 of a mile (walking distance) from the Pershing Square Station (at 5th Street and Hill Street) and 0.86 of a mile (walking distance) to the Westlake MacArthur Park Station.

Primary regional access to the Project Site is provided by the Hollywood Freeway (US-101) and the Harbor/Pasadena Freeway (I-110/SR-110). The Hollywood Freeway runs in a north-south direction north of the Project Site, while the Harbor/Pasadena Freeway runs in a north-south direction east of the Project Site. These two freeways also provide access to the San Bernardino (I-10) and Santa Ana (I-5) freeways to the east, to the Golden State Freeway (I-5) to the north, and to the Santa Monica (I-10) and Pomona (SR-60) freeways to the south.

The roadways adjacent to the Project Site are served by several bus lines managed by multiple transit operators that include the Los Angeles County Metropolitan Transportation Authority ("Metro"), LADOT DASH, Montebello Bus Lines, and Orange County Transportation Authority ("OCTA"). The Project Site's proximity to the 7th Street/Metro Center Station, approximately one-half mile to the southeast, provides transfer opportunities to other Metro rail services, Amtrak, Metrolink, and numerous bus routes served by Metro, LADOT, and municipal bus operators.

Local street access is provided by the grid roadway system surrounding the Project Site and surrounding area. W. 5th Street, which borders the Project Site to the north, is a two-way east-westbound street providing one travel lane in each direction. 5th Street is classified as a Collector Street. S. Bixel Street, which borders the Project Site to the east, is a two-way north-southbound street providing one travel lane in each direction. Bixel Street is classified as a Modified Avenue II roadway. 6th Street, located south of the Project Site, is a two-way east-westbound street providing two travel lanes in each direction. 6th Street is classified as an Avenue II roadway. Lucas Avenue, located west of the Project Site, is a two-way north-southbound Avenue II roadway that provides one travel lane in each direction.

2. Existing Conditions

a. Project Site Conditions

The Project Site contains approximately 83,659 gross square feet (1.92-acre) of lot area and is comprised of two sites joined by an alleyway. The northern portion of the Project Site (also referred to herein as the "North Block") includes five parcels fronting 5th Street. The southern portion of the Project Site (also referred to herein as the "South Block") includes five parcels fronting 6th Street and three parcels fronting Bixel Street. The elevation across the Project Site increases from south to north and west to east. The South Block is approximately 361 feet above mean sea level and the North Block is approximately 376 feet above mean sea level.

The Project Site is currently improved with one three-level parking structure on the North Block that fronts W. 5th Street and two commercial buildings on the South Block that front W. 6th Street. For purposes of this EIR the buildings on the South Block are identified as "Building A" and "Building B." Building A is a five-story commercial office and medical building located at 1115 – 1135 W. 6th Street. Building A consists of approximately 69,160 square feet of gross building area. Building B is a four-story commercial office and medical office building located at 1101-1113 W. 6th Street and 517 and 521 S. Bixel Street. Building B includes 42,112 square feet of gross building area. In total, the South Block consists of 111,272 square feet of gross building area.

b. Existing Planning and Zoning

The Project Site is located in the Westlake Community Plan Area (CPA) within the City of Los Angeles. The Specific Plan area is divided into three subareas: the North Subarea, Central Subarea (includes the Witmer/Lucas District, the 1st/2nd Street District, and the Crown Hill District), and South Subarea (includes the Wilshire Corridor District and the 8th/9th Street District). The Project Site is located within the Crown Hill District in the Central Subarea.

The Project Site is zoned R5(CW)-U/6, C2 (CW)-U/3 and C4(CW)U/4.5. As indicated by the "(CW)" designation, the entire Project Site falls within the "CW" overlay, which refers

to the zoning designations of the Central City West Specific Plan ("Specific Plan"). The specific development regulations pertaining to the Project Site's zoning designation is therefore addressed below under the Central City West Specific Plan subheading. With respect to zoning, the Project Site is also located in a Los Angeles State Enterprise Zone (ZI No. 2374) that regulates parking standards. The Project Site is also within the jurisdiction of the Freeway Adjacent Advisory Notice for Sensitive Uses (ZI No. 2427) and is designated as a transit priority area (ZI No. 2452).

c. Surrounding Land Uses

The properties surrounding the Project Site include commercial retail, office, multi-family residential buildings, schools, the Good Samaritan Hospital, and an active construction site for the approved Bixel and Lucas Project. When complete, the Bixel and Lucas Project will add approximately 648 dwelling units and 40,000 square feet of ground-floor commercial space. A description of the land uses surrounding the Project Site is as follows:

North: 5th Street immediately borders the North Block of the Project Site to the north. Multi-family residential buildings and an office building front the north side of 5th Street. An office building borders the northeast edge of the Project Site on the southwest corner of Bixel Street and 5th Street. The land uses that front the north side of 5th Street are designated as Regional Center Commercial and High Density Residential.

East: Bixel Street immediately borders the South Block of the Project Site to the east. A surface parking lot lies to the east of Bixel Street and the Project Site. An office building, located on the southwest corner of 5th Street and Bixel Street, the Los Angeles Center Studios and a multi-family apartment building (along 5th Street) are located to the northeast of the Project Site. A multi-family apartment building (the Piero Apartment building) is located southeast of the Project Site. The land uses to the east are designated as Regional Center Commercial.

South: 6th Street immediately borders the South Block of the Project Site to the south. The Bixel and Lucas Project Site, currently under construction, borders the south side of 6th Street. The Bixel and Lucas Project, once operational, will consist of 648 dwelling units and approximately 40,000 square feet of ground floor commercial space. One office building remains on the construction site and is being converted to apartments. The building is located on the northwest corner of the construction site. The land uses to the south of the Project Site are designated as Community Commercial and Regional Center Commercial.

West: Commercial land uses along W. 6th Street and Para Los Niños building border the Project Site to the west. Lucas Avenue is located to the west of the Project Site. On the west side of Lucas Avenue, the Para Los Niños – Evelyn Thurman Gratts Primary School and the Good Samaritan Hospital complex are located to the northwest and southwest of the Project Site, respectively. The land uses to the west are designated as Regional Center Commercial, Community Commercial, and High Density Residential.

3. Proposed Project

The Proposed Project includes the demolition of the existing structures on-site (a multi-level parking garage, one four-story commercial office and medical office building, and one five-story

commercial office and medical office building) and the construction of two buildings (North Building and South Building) with a total of 369 residential units and 22,000 square feet of ground-floor commercial use. The North Building would include 142 residential units. The South Building would include 227 residential units and 22,000 square feet of ground floor retail, which may include retail, restaurant, and coffee shop uses. The two buildings would be connected by a footbridge that spans above the adjacent alleyway. Both buildings would include seven stories above grade and two levels of subterranean parking.

a. Residential Uses

The Applicant is proposing to provide up to 369 residential units within two buildings (North Building and South Building). The North Building would include up to 142 residential units, anticipated to include 56 studio units, 45 one-bedroom units, 30 two-bedroom units, and 11 three-bedroom units. The South Building would include up to 227 residential units, anticipated to include 137 studio units, 51 one-bedroom units, 26 two-bedroom units, and 13 three-bedroom units. In total, the Proposed Project would include approximately 193 studio units, 96 one-bedroom units, 56 two-bedroom units, and 24 three-bedroom units; of varying sizes and configurations.

The proposed development would include residential lobbies, mailroom, residential amenities, and a leasing office. Residential amenities may include but are not limited to: swimming pools, spas, landscaped courtyards, cabana, outdoor seating, clubhouse, fitness center, skydeck, ping pong table, fire pit, barbeque areas, outdoor relaxing areas, outdoor kitchen, and dog wash station.

b. Commercial Uses

The Proposed Project includes neighborhood-serving commercial space, which totals approximately 22,000 square foot of floor area. The commercial uses would be located on the ground floor of the South Building, fronting both 6th Street and Bixel Street. The commercial uses proposed for the ground level on the South Building include a total of 18,600 square feet of general retail space, a 2,200 square foot quality restaurant, and a 1,200 square-foot café/coffee shop.

c. Floor Area

The Project Site's gross lot area is approximately 83,659 square feet. The North Block has a land use category of R5(CW)-U/6 and has a land use designation of High Density Residential; the two western parcels on the South Block have a land use category of C2(CW)-U/3 and has a land use designation of Community Commercial; and the remaining parcels on the South Block have a land use category of C4(CW)-U/4.5 and have a land use designation of Regional Center Commercial. The allowable Floor Area Ratio (FAR) in the R5 designation is 6:1; C2 designation is 3:1; and C4 designation is 4.5:1. The total allowable FAR for the Site is 4.70:1, which allows up to 363,227.7 square feet of development. The Proposed Project proposes a 348,430.5 square feet of floor area (4.51:1 FAR), which is within the allowable FAR.

d. Building Height

The Specific Plan guides development on the Project Site. For the Project Site, the Specific Plan specifies that buildings or structures shall not exceed a maximum height of

1,218 feet above mean sea level (MSL). The Project Site is between 361 feet above MSL on the South Block and 376 feet above MSL on the North Block. The proposed buildings would be a total of seven stories above grade. The North Building would reach approximately 98 feet and 2 inches above grade, and the South Building would reach approximately 91 feet and 11 inches above grade. The proposed building heights would result in a maximum of approximately 465 feet above MSL. The South Building would appear to be lower than the North Building due the elevation change across the Project Site. The Proposed Project would contain approximately two levels of subterranean parking. The North Building would include seven levels of residential uses. The South Building would include ground-floor commercial space with six levels of residential uses atop the first floor, which would include commercial space and the residential lobby.

e. Architectural Features

Architectural features would include a mix of materials and architectural elements, which may include but is not limited to: aluminum windows, pre-finished metal panels, painted metal railing, glass railing, vinyl window, exterior plaster, and composite siding.

f. Open Space and Landscaping

Open space courtyards and landscaping features are proposed throughout the Proposed Project. Amenities proposed within the common open space areas include swimming pools, spas, landscaped courtyards, cabana, outdoor seating, clubhouse, fitness center, skydeck, ping pong table, fire pit, barbeque areas, outdoor relaxing areas, outdoor kitchen, and dog wash station. The Proposed Project's landscape palate would feature ornamental plants and drought-tolerant species. The Proposed Project would include 16,075 square feet of open space within the North Building and 24,600 square feet of open space in the South Building for a total of 40,675 square feet of open space on-site.

g. Parking and Access

Parking for the Proposed Project would be provided on-site via multi-level structures located under the two proposed buildings, with three access points provided. Access to residential parking would be provided via the east-west alley that runs parallel to and between 5th and 6th Streets, with one driveway supplied for each of the buildings. Parking within the South Building would be provided within two levels of subterranean parking and partially at-grade. Vehicular access to the South Building would be provided via one ingress/egress driveway on 6th Street and one ingress/egress driveway on the adjacent alleyway. Parking within the North Building would be provided in one level of subterranean parking and one level partially at-grade. Vehicular access to the North Building would be provided via one ingress/egress driveway from the alley. On-site parking would serve both residential and retail uses. Retail parking would be provided in the South Building and accessed through the 6th Street vehicular driveway. Residential parking for both buildings would be accessed through the driveways along the alleyway. As part of the Proposed Project, this alley would be converted to one-way westbound operation.

The Proposed Project would be consistent with the applicable parking requirements of the LAMC. The Proposed Project would require and provide a total of 390 parking spaces with 355 residential spaces and 35 retail spaces. Pursuant to LAMC 12.21.A.4, the Proposed Project seeks a 10 percent reduction in the number of residential stalls required,

and a 20 percent reduction in the number of commercial stalls required. The total number of spaces provided is consistent with what would be required with these reductions.

The Proposed Project would provide 380 long-term and 49 short-term bicycle parking spaces for the residential units and commercial space. The proposed bicycle parking and the reduction of automobile parking spaces are based upon the provisions of Ordinance 182,386 (eff. March 13, 2013).

h. Construction

This analysis assumes a construction schedule of approximately 24 months, with final buildout occurring in 2019. Construction activities associated with the Proposed Project would be undertaken in six main activities: (1) demolition, (2) site clearing/preparation, (3) grading/excavation, (4) building construction, (5) paving, and (6) architectural coatings/finishing. The building construction phase includes the construction of the proposed buildings, connection of utilities to the buildings, laying irrigation for landscaping, architectural coatings, paving, and landscaping the Project Site.

The Demolition/Site Clearing Phase would include the demolition of approximately 111,272 gross square feet of the existing buildings and the three-level parking structure (approximately 59,492 sf) on the Project Site. In addition, this phase would include the removal of street trees, walls, fences, and parking lot related debris. The demolition/site clearing would be completed in approximately two to three months.

After the completion of demolition/site clearing, the excavation phase for the Proposed Project would occur for approximately 4 months and would involve the cut and fill of land to ensure the proper base and slope for the building foundations. The Proposed Project would require approximately 99,151 cubic yards of soil to be hauled off-site in order to build the subterranean parking garages. Haul trips would occur outside of the peak hours and during the permissible hauling hours.

The building construction phase consists of below grade and above grade structures and is expected to occur for approximately 12 months. Upon completion of the structures, architectural coating, finishing, and paving would occur. It is estimated that architectural coatings would occur over the final four months of the building construction phase, and paving would occur during the final month of construction.

Construction activities may necessitate temporary lane closures on streets adjacent to the Project Site on an intermittent basis for utility relocations/hook-ups, delivery of materials, and other construction activities as may be required. However, site deliveries and the staging of all equipment and materials would be organized in the most efficient manner possible on-site to mitigate any temporary impacts to the neighborhood and surrounding traffic. Construction equipment would be staged on-site for the duration of construction activities. Traffic lane and right-of-way closures, if required, would be properly permitted by the City agencies and would conform to City standards.

All construction activities would be performed in accordance with all applicable state and federal laws and City Codes and policies with respect to building construction and activities. As provided in Section 41.40 of LAMC, the permissible hours of construction within the City are 7:00 a.m. to 9:00 p.m. Monday through Friday, and between 8:00 a.m.

and 6:00 p.m. on any Saturday or national holiday. No construction activities are permitted on Sundays. The Proposed Project would comply with these restrictions.

i. Haul Route

All construction and demolition debris would be recycled to the maximum extent feasible. Demolition debris and soil materials from the Project Site that cannot be recycled or diverted would be hauled to the Sunshine Canyon or Chiquita Canyon landfills, which accept construction and demolition debris and inert waste from areas within the City of Los Angeles.

For purposes of analyzing the construction-related impacts, it is anticipated that the excavation and soil export would involve 18-wheel bottom-dump trucks with a 20 cubic yard hauling capacity (i.e., 30 tons maximum gross weight). All truck staging would either occur on-site or at designated off-site locations and radioed into the site to be filled. The local haul route to and from the Harbor (I-110) Freeway would likely utilize 6th Street, which is designated as an Avenue II roadway; Figueroa Street, which is designated as a Boulevard II roadway; Wilshire Boulevard, which is designated as an Avenue II roadway; Bixel Street, which is designated as a Modified Avenue II roadway; and 5th Street, which is designated as a Collector Street. The haul route specified above may be modified in compliance with City policies, provided DOT and/or Street Services approves any such modification.

E. IMPACTS DETERMINED IN THE INITIAL STUDY TO HAVE NO IMPACTS, TO BE LESS THAN SIGNIFICANT, OR LESS THAN SIGNIFICANT WITH MITIGATION.

1. Environmental Categories the Initial Study Determined Had No Impacts

Section 15128 of the CEQA Guidelines states that an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and not discussed in detail in the EIR. The City of Los Angeles Department of City Planning prepared an Initial Study dated March 10, 2016 that evaluated the Project Applicant's development program for the Project Site at that time. This Initial Study determined that an Environmental Impact Report (EIR) was required and the City issued a Notice of Preparation (NOP) of an EIR on March 10, 2016. The Initial Study provides a discussion of the potential environmental impacts by topic and the reasons that each topical area is or is not analyzed further in the Draft EIR. As further described in the Initial Study, the City determined that the Project would not result in significant impacts related to (i) Agricultural and Forestry Resources, (ii) Biological Resources, (iii) Hydrology and Water Quality, (iv) Mineral Resources, and (v) Recreation.

The rationale for the conclusion that no significant impact will occur in each of these issue areas is summarized below (and set forth in Appendix A of the Draft EIR). Based on that rationale and other evidence in the administrative record, the City finds and determines that the Proposed Project will not result in any significant impacts in the following environmental impact categories and that no mitigation measures are needed.

2. Environmental Categories the Initial Study Determined May Have Significant Impacts

The Initial Study determined that the Project may have significant impacts in the following environmental categories: (i) Aesthetics, (ii) Air Quality, (iii) Cultural Resources, (iv)

Geology/Soils, (v) Greenhouse Gases, (vi) Hazards and Hazardous Materials, (vii) Land Use, (viii) Noise, (ix) Population, Housing and Employment, (x) Transportation and Traffic, (xi) Public Services, and (xii) Utilities/Service Systems.

F. IMPACTS THE EIR FOUND TO BE LESS THAN SIGNIFICANT

Based on the analysis in the Draft EIR and other evidence in the administrative record relating to the Project, the City finds and determines that the following environmental impact categories will not result in any significant impacts and that no mitigation measures are needed.

1. Aesthetics

a. Project Impacts

- Scenic Vistas and Scenic Resources

The Proposed Project would result in a less than significant impact upon scenic vistas and scenic resources.

Scenic Vistas

The Project Site is located in a highly urbanized area and is currently developed with three structures, including (1) an approximately 69,160 gross square foot five-story commercial office and medical office building; (2) an approximately 42,112 gross square foot four-story commercial office and medical office building; and (3) an approximately 59,492 square foot three-story parking structure with approximately 308 parking spaces. Development of the Proposed Project would not remove any existing natural scenic resources.

The Project Site and surrounding area are in proximity to downtown Los Angeles. The downtown skyline is visible by looking eastward along Bixel Street, 5th Street, 6th Street, and portions of Lucas Avenue in the vicinity of the Project Site. Due to the Project's scale and massing, and proposed building heights of 98 feet and 2 inches above grade (North Building) and 91 feet and 11 inches above grade (South Building), the Proposed Project would have the potential to further constrict distant views of the downtown Los Angeles from Lucas Avenue. However, as described above, views from Lucas Avenue looking eastward are presently hindered by existing development on-site and in the Project Site area. Although the Proposed Project would alter the existing viewshed and aesthetic character of the existing Project Site, the development of the Proposed Project would have minimal impacts on views to downtown along W. 5th Street, W. 6th Street, and Bixel Street, since Project development is limited to the Project Site. The Proposed Project would not adversely impact or block any existing scenic views within the immediate Project Site vicinity or at the pedestrian level. As previously discussed, views within the Project Site vicinity are limited at the pedestrian level as a result of the arrangement of existing buildings, which block distant or panoramic views of the downtown skyline. The Project Site is located in zones that provide between three and six times the buildable area of the lot and a building height of up to 1,218 feet above MSL. The Proposed Project is consistent with allowable height and density for the Project Site. The Proposed Project would not surpass the L.A. CEQA Thresholds for a significant impact to occur. Therefore, the Proposed Project would have a less-than-significant impact with respect to public scenic vistas.

Moreover, the Proposed Project is located on a Transit Priority Area. Pursuant to Public Resources Code Section 21099, the Proposed Project's aesthetic impacts shall not be considered significant impacts on the environment.

Scenic Resources

The Project Site is currently developed with three buildings. With respect to natural scenic resources, there are no natural open space areas located on-site or in the surrounding vicinity. The Project Site is currently fully developed and no rock outcroppings or natural open space exist on-site. Currently, there are fifteen trees on-site and three street trees that border the Project Site along 5th Street, none of which are protected or native species. All trees are proposed for removal for the construction of the Proposed Project. The City of Los Angeles Department of Public Works, Urban Forestry Division, provides guidance on the issue of construction impacts to trees within the City of Los Angeles. The Proposed Project would be subject to the Urban Forestry Division's standards for the anticipated removal of the fifteen on-site trees and three street trees during the construction phase of the Project. The eighteen trees are non-protected species. All significant (8-inch or greater in diameter trucked trees, or cumulative truck diameter trees) would be replaced at a 1:1 ratio with a minimum 24-inch box tree.

The Project Site is not bordered by or within the viewshed of any State-designated scenic highway or any designated scenic highway as identified in the City of Los Angeles Mobility Plan. As such, development of the Proposed Project would not damage scenic resources including, trees, rock outcroppings, historic buildings, or scenic resources within a designated scenic highway. Therefore, impacts related to scenic resources of the Project Site would be less than significant. Moreover, the Proposed Project is located in a Transit Priority Area. Pursuant to Public Resources Code Section 21099, the Proposed Project's aesthetic impacts shall not be considered significant impacts on the environment.

Visual Character and Quality

The Proposed Project would result in a less than significant impact with respect to the visual character and quality of the surrounding environment.

Construction-Related Impacts

Construction of the Proposed Project would be temporary and would not substantially degrade the existing visual character or quality of the Project Site and its surroundings. As shown in Figures IV.A-1 through IV.A-7 in the Draft EIR, the visual character of the Project Site and surrounding area is defined by multi-family residential buildings, commercial and office buildings, school facilities, hospital and medical facilities, and a surface parking lot. The property to the south of the Project Site is currently under construction. During the Proposed Project's construction period, the Project Site would undergo considerable changes with respect to the aesthetic character of the Project Site and surrounding area. Construction activities would require demolition, site preparation, grading, excavation, and building construction. These construction activities would create construction debris and soils stockpiles, staged building materials and supplies, and construction equipment, all of which could occupy the field of view of passing motorists, pedestrians, and neighboring properties. Thus, the existing visual character of the Project Site would temporarily change with construction-related activities. Construction of the Proposed Project would result in a temporary and potentially significant impact to visual character and image of the surrounding neighborhood. As part of the construction process, the Applicant would install a temporary fencing around the perimeter of the Project Site for security purposes

and to block views of the Project Site from the pedestrian level. Installation of temporary fencing and compliance with the applicable regulatory measures would further reduce visual impacts caused during the construction of the Proposed Project. For example, temporary signs on temporary construction walls shall comply with the construction requirements of LAMC Section 14.4.16 E. Pursuant to LAMC Section 14.4.17, the Applicant is also responsible for maintaining the visibility of the required signage and for maintaining a construction barrier free and clear of any unauthorized signs and graffiti within 24 hours of occurrence. Compliance with these regulatory requirements would reduce visual impacts during construction to a less than significant level.

Operational Impacts

The Proposed Project would provide two contemporary, seven-story buildings as part of a mixed-use development that would serve to revitalize a largely underutilized property within the Westlake area. The North Building would be a residential building and would front W. 5th Street. The South Building would include ground-floor retail and apartment units above the ground-floor retail space. The South Building would front W. 6th Street and Bixel Street. The North Building would be approximately 98 feet and 2 inches above grade, and the South Building would be approximately 91 feet and 11 inches above grade. Due to the topography of the area, elevation across the Project Site increases from south to north and west to east. As such, the North Building would visually be approximately 15 feet taller than the South Building, which is consistent with the slope of the natural grade. The North Building and South Building would be connected by a footbridge at the podium level that would span the alleyway.

The Proposed Project would comprise contemporary structures proposed on an infill site within a developed area. Building materials would include composite siding, plaster, vinyl windows, painted metal railings, glass railings, aluminum windows, plaster, composite siding, pre-finished metal panels, and exterior tile cladding. As noted in Project Design Feature (PDF) A-1, below, on-site utilities that serve the Proposed Project will be installed underground per the recommendations of the Department of Building and Safety and Department of Water and Power. The Proposed Project would be landscaped throughout the Project Site and along W. 5th Street and W. 6th Street.

With respect to building height and massing, the Proposed Project's seven story buildings would be consistent with the height of surrounding buildings. Buildings within the vicinity of the Project Site range between one to ten stories in height. The property immediately to the south of the Project Site, across 6th Street is approximately six stories above grade. The Piero Apartments building, located at the southeast corner of Bixel and 6th Street is seven stories above grade. The Mint apartment building, located one block west of the Project Site at 1136 W. 6th Street is eight stories above grade. The Good Samaritain Hospital building located at 637 Lucas Avenue, one block south of the Project Site is ten stories in height. Building height regulations for the Project Site and within the Project area is established by the CCWSP, which limits building height in the Project Site area to 1,218 feet above the mean sea level (MSL). The Proposed Project's buildings would be a maximum height of approximately 91 feet and 11 inches above grade (South Building) and 98 feet and 2 inches (North Building), which is approximately 466 feet above MSL at its highest point. Therefore, the Project's proposed maximum height would be substantially within the allowable development height for the area. Additionally, the Proposed Project includes one residential courtyard as part of the North Building and four residential courtyards and a public plaza as part of the South Building. These elements would break up the Proposed Project's massing. Illustrative Renderings of the Proposed Project are included in Figure II-26, in the Project Description. While the scale and massing of the proposed structures would change the existing

visual character of the Project Site area, the new development would be visually consistent with surrounding uses and buildings currently under construction.

The Project is requesting Specific Plan Exceptions of the Central City West Specific Plan for building setbacks. The discretionary requests seek a zero-foot front yard setback for the North Building in lieu of the 15 feet required, zero-foot side yard setbacks for the east and west property lines for the North Building in lieu of the 10 foot setback required, a zero-foot rear yard setback for the seven-story North Building in lieu of the 19 foot setback required, a zero-foot rear yard setback for the South Building in lieu of the 19 feet required, and to deviate from the street standards of 5th Street, required by the CCWSP, to be consistent with the newly adopted 2035 Mobility Plan. Approval of these discretionary requests would allow for the Project to be built with a 17-foot commercial sidewalk on Bixel Street (with a 5 foot commercial setback at grade), a 10 foot sidewalk after dedication on W. 5th Street, and a 12 foot wide sidewalk on W. 6th Street after a 2' – 9" dedication. The approval of the requested setbacks would not result in any significant adverse aesthetic impacts, as the Project would maintain appropriate building setbacks that are consistent with existing buildings on W. 5th Street. For example, the existing buildings immediately adjacent to the Project Site on the south side of W. 5th Street (located at 1350 w. 5th Street and 1312 W. 5th Street) predate the CCWSP and do not adhere to the setback requirements. Additionally, the property located immediately across 5th Street from the Project was granted zero-foot front and side yards pursuant to APCC 2005-2155 for an 80 unit residential development in the C4 and R5 zones.

As with any new development, building façades have the potential to deteriorate over time and can be subjected to vandalism, litter, and graffiti. As required by the CCWSP's Urban Design Guidelines, 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, including an automatic irrigation plan, prepared by a licensed landscape architect in accordance with the LAMC. Additionally, every building, structure, or portion thereof, shall be maintained in a safe and sanitary condition and good repair, and free from graffiti, debris, rubbish, garbage, trash, overgrown vegetation or other similar material, pursuant to LAMC Section 91.8104. Thus, the Project Site would be maintained in a safe and sanitary condition and good repair, free from graffiti, debris, rubbish, garbage, trash, or overgrown vegetation. Therefore, impacts to visual character would be less than significant. Moreover, the Proposed Project is located in a Transit Priority Area. Pursuant to PRC 21099, the Proposed Project's aesthetic impacts shall not be considered significant impacts on the environment. The analysis presented herein is provided for informational and Department of City Planning review purposes.

Impacts to Light and Glare

Impacts to Light and Glare

Nighttime Lighting

The Proposed Project would result in a less than significant impact with respect to the introduction of nighttime lighting and illumination and glare from architectural features.

Ambient nighttime lighting on the Project Site and in the Project Site vicinity is generated by sources that include streetlights, automobile headlights, and indoor/outdoor building lighting. The Proposed Project would introduce lighting to the Project Site area due primarily to building illumination emanating through the windows of the proposed ground-floor commercial storefronts, residences, security and pedestrian safety lighting fixtures, and light from vehicles entering and leaving the parking garages.

Lighting associated with the proposed ground-floor commercial uses and the parking garage driveways is not anticipated to substantially impact any surrounding sensitive uses. The North Building includes one driveway that would connect to the alleyway and would provide access to residential parking (See Figure II-11, North Building Parking Level 1 and South Building First Level Floor Plans). The South Building includes two driveways: one driveway providing access to residential parking spaces connecting to the alleyway and one driveway providing access to retail parking spaces connecting to W. 6th Street. (See Figure II-10, North Building Parking Level 2 and South Building First Level (Lower Retail) Floor Plans and Figure II-11). As such, vehicles leaving the Project Site have the potential to shine headlights southward when exiting the retail parking and westward when exiting the residential parking garages.

Vehicles leaving the W. 6th Street driveway would shine headlights to properties fronting the south side of W. 6th Street, which would be the mixed-use Bixel and Lucas development that would provide ground-floor retail along W. 6th Street. Vehicles leaving the Project Site from the 6th Street driveway would be limited to business hours, since this driveway provides access to retail parking.

Land uses to the west of the Project Site include the Para Los Niños school and commercial uses. These services generally operate during business hours and would not be affected by nighttime headlights of vehicles leaving the Project Site along the east-west alley that divides the North Block and the South Block of the Project Site. Representatives from the City of Los Angeles Department of Transportation (LADOT) and Bureau of Engineering (BOE) requested that, as part of the Project, the alley be limited to one-way (westbound) operations until the alley's full 20-foot width is dedicated along the entire segment between Lucas Avenue and Bixel Street. As such, the Proposed Project would not result in vehicles headlights casting light on light-sensitive uses.

Light emanating from the proposed upper-stories would be a relatively low-level indirect source of light and would not adversely impact other properties in the immediate area. Overall, the Proposed Project would be expected to slightly increase ambient lighting in the area with sources of lighting that already exist in the Project Site and would be consistent with existing uses in the Project Site area. The implementation of PDF A-2 would ensure the Proposed Project incorporates low-level directional lighting at the ground and podium levels of the exterior of the proposed structures to reduce light spillover onto adjacent properties. The Proposed Project would not surpass the L.A. CEQA Thresholds for a significant impact to occur. Impacts related to nighttime lighting would therefore be less than significant. Further, the Proposed Project shall comply with Section 99.05.106.8, Light Pollution Reduction, of the City of Los Angeles Green Building Code (Ord. 182849), which mandates that outdoor lighting systems be designed and installed to comply with the following:

- The minimum requirements in the California Energy Code for Lighting Zones 1-4 as defined in Chapter 10 of the California Administrative Code; and
- Backlight, Uplight and Glare (BUG) rating as defined in IESTM-15-11; and
- Allowable BUG ratings not exceeding those shown in Table 5.106.8 (located in the 2014 Los Angeles Green Building Code), or comply with a local ordinance lawfully enacted pursuant to Section 101.7, whichever is more stringent.

Moreover, pursuant to Public Resources Code Section 21099, the Proposed Project's aesthetic impacts shall not be considered significant impacts on the environment.

Daytime Glare

The Project Site currently produces minimal glare, primarily associated with vehicles parked on the on-site parking lot. The Proposed Project would introduce two seven-story buildings to the Project Site. It is likely that some degree of glare could be generated by the façade materials and windows. However, the Project's facades and windows would be constructed with materials designed to reduce glare pursuant to PDF A-3. The architectural materials of the Proposed Project would be compatible with other contemporary structures in the area, and would result in a less than significant impact with respect to generating a source of glare within the Project Site area. Moreover, pursuant to Public Resources Code Section 21099, the Proposed Project's aesthetic impacts shall not be considered significant impacts on the environment.

Shade and Shadow

The Proposed Project would result in a less than significant impact with respect to shade and shadow impacts.

A shade and shadow analysis projecting the building shadow patterns resulting from the proposed structures was prepared and is included in the Draft EIR as Figures IV.A-8 through IV.A-23. Land use categories were mapped out in the Project Site area. The Proposed Site has a land use category of R5(CW)-U/6 on the parcels fronting 5th Street; C4(CW)-U/4.5 on the parcels fronting Bixel Street and the three abutting parcels on 6th Street; and C2(CW)-U/3 on the two remaining parcels on 6th Street. Pursuant to the Section8.A.5 of the CCWSP, no R3 or R4 zones or R4(CW) or RC4(CW) Land Use Categories are located within the Proposed Project's potential shade and shadow envelope. As such, the Proposed Project would have no impact with respect to shade and shadow with regards to the CCWSP requirements.

Winter Solstice Shadows

The Proposed Project's winter solstice shadows would travel in a clockwise motion from northwest to northeast. Land uses and structures to the northwest and northeast include the Para Los Niños school facilities, office buildings, commercial uses, and multi-family residential land uses. Based on a survey of the Project Site vicinity, the residential building at 1311 W. 5th Street additionally contains an outdoor pool and is identified as a shade sensitive land use.

As shown in Draft EIR Figures IV.A-8 through IV.A-14, the winter solstice shadows created by the Proposed Project would shade the outdoor pool for approximately two hours starting at 1:00 PM where the shadow starts to shade the pool. The pool is completely shaded by 2:00 PM and continues to be completely shaded through 3:00 PM. Therefore, the Proposed Project's shadows on an adjacent shadow sensitive land use would not exceed three hours during the winter months. Therefore, winter shadow impacts pursuant to the L.A. CEQA Thresholds Guide would be less than significant.

The Proposed Project would be consistent with the CCWSP's shadows criteria with respect to shadow impacts. Section 8.A.5 of the CCWSP states that buildings or structures located on a lot in the R5(CW), RC5(CW), C2(CW), C4(CW) or CM(CW) Land Use Category shall not cast shadows on a lot located in the R3 or R4 Zone or the R4(CW) or RC4(CW) Land Use Category for more than two hours each day between the hours of 9 a.m. and 3 p.m. on the Winter Solstice. While the Project Site includes the R5, C4 and C2 land use designations, the properties to the north of the Project Site which would be impacted by the Project's shadows are not zoned R3 or R4 nor do they have a land use category of R4(CW) or RC4(CW). The identified sensitive receptors are located on properties with R5(CW)-U/6 and C4(CW)-U/4.5 land use categories. Therefore, the Proposed Project would not cast shadows on a lot located in the R3 or R4 Zone or

the R4(CW) or RC4(CW) Land Use Category for more than two (2) hours each day between the hours of 9 a.m. and 3 p.m. on the Winter Solstice. As such, the Proposed Project would be consistent with the CCWSP's shade and shadow provisions. Thus, given the fact that the Proposed Project's shadows would not impact adjacent shadow sensitive land uses for more than three hours during the winter months, and the fact that the Project's shadows would not affect any lots located in the R3, R4 Zone or the R4(CW) or RC4(CW) Land Use Category on the Winter Solstice, the Proposed Project's winter shade and shadow impacts would be considered less than significant.

Summer Solstice Shadows

The Proposed Project's summer solstice shadows would travel in a clockwise motion from west to east. Land uses and structures to from the west to the east include commercial buildings and Para Los Niños school administrative offices to the west of the Project Site, multi-family residential buildings and an office building to the north of the Project Site, and multi-family residential and office buildings to the east of the Project Site. Due to the relatively short shadow lengths, the Proposed Project's North Building would not cast a shadow on the identified sensitive receptor to the north. As shown in Draft EIR Figures IV.A-15 through IV.A-23, the summer solstice shadows created by the Proposed Project would shade surrounding commercial buildings, Para Los Niños administrative building, and office buildings. Furthermore, based on the current aerial photographs obtained through Google Earth (image date 3/23/2015) as shown in Draft EIR Figures IV.A-8 through IV.A-23, there do not appear to be any solar panels or photovoltaic arrays within the summer shadow envelope. Therefore, the Proposed Project would not cast shadows on any identified shade-sensitive uses for more than four hours between 9:00 a.m. and 5:00 p.m. during the summer solstice. Therefore, summer shadow impacts pursuant to the L.A. CEQA Thresholds Guide would be less than significant.

Additionally, the Proposed Project is consistent with Section 8.A.5 of the CCWSP (page 26). The Proposed Project would not cast shadows on a lot located in the R3 or R4 Zone or the R4(CW) or RC4(CW) Land Use Category for more than two (2) hours each day between the hours of 9 a.m. and 5 p.m. on the Summer Solstice. As such, the Proposed Project would be consistent with the CCWSP's shade and shadow provisions. Therefore, given the fact that the Proposed Project's shadows would not impact adjacent shadow sensitive land uses for more than four hours during the summer months, and the fact that the Project's shadows would not affect any lots located in the R3, R4 Zone or the R4(CW) or RC4(CW) Land Use Category on the Summer Solstice, the Proposed Project's summer shade and shadow impacts would be considered less than significant.

b. Cumulative Impacts

The application of Public Resources Code Section 21099 provides that the aesthetic impacts of a mixed-use residential project, such as the Proposed Project, on an infill site within a transit priority area shall not be considered significant impact on the environment. Pursuant to Public Resources Code Section 21099, the Proposed Project would not contribute to cumulative aesthetic impacts. Development of the Proposed Project in conjunction with the 99 related infill projects would result in an intensification of existing prevailing land uses in the transit priority area in the Westlake Community within the City of Los Angeles. Development of the related projects is expected to occur in accordance with adopted plans and regulations.

Cumulative Scenic Vistas, Scenic Resources, Visual Character, and Quality of the Site

The Proposed Project in combination with the identified related projects would affect the architectural urban revitalization of the Project Site area. In addition, similar to the Proposed Project, related projects would be expected to conform to the urban design guidelines outlined in the CCWSP (if applicable) and the associated community plan that applies to each related project site.

Based on a review of the related projects within proximity to the Project Site shown in Figure III-1, Related Projects Location Map, the Bixel and Lucas Project (Related Project No. 23) is the only related project in the immediate vicinity of the Project Site. The Bixel and Lucas Project along with the Proposed Project would alter the aesthetic character of the Project Site area, specifically along W. 6th Street and Bixel Street. Both projects would enhance the aesthetic character of the underutilized sites in a manner that is consistent with the surrounding community. Development of the projects would not block primary views of downtown when looking east along the W. 6th Street corridor.

Development of the related projects is expected to occur in accordance with adopted plans and regulations. With respect to the overall visual quality of the surrounding neighborhood, each of the related projects within the CCWSP would be subject to Site Plan Review and Specific Plan Project Permit Compliance Review by the City of Los Angeles Department of City Planning for review and approval. It is anticipated that similar to the Proposed Project, each related project would be subject to the applicable provisions of the LAMC with respect to building height, setbacks, the allowable floor area, which would ensure the buildout of the community is consistent with the underlying zoning codes and General Plan land use policies that are in place to preserve the neighborhood's aesthetics and character. The Site Plan Review and Specific Plan Project Permit Compliance Review process would ensure that each project is designed and constructed in a manner that is consistent with and compatible with the existing urban form and character of the surrounding environment. As such, the Project Site that would not combine to create a cumulative aesthetic impact, either in terms of blockage of views or architectural compatibility. As such, the Proposed Project would not make a cumulatively considerable contribution to a scenic vista, scenic resource, visual character impact, and less than significant cumulative impact would occur.

Cumulative Light and Glare Impacts

With respect to light and glare impacts, the Proposed Project in combination with the related projects would increase nighttime lighting and daytime glare in the area. Similar to the Proposed Project, related projects would be expected to comply with Code-required lighting measures that would reduce light and glare impacts. As such, the Proposed Project would not make a cumulatively considerable contribution in light or glare, and a less than significant impact would occur.

Cumulative Shade and Shadow Impacts

Cumulative aesthetic impacts could occur if other related projects in the vicinity of the Project Site would combine with the Proposed Project to shade a shade-sensitive use for more than three hours in the winter or for more than four hours in the summer (pursuant to the LA CEQA Thresholds). A cumulative aesthetic impact could also occur if the Proposed Project along with other related projects would produce shadows that do not comply with the requirements of the Specific Plan Section 8.A.5.

The Bixel and Lucas Project, related Project No. 23, is located directly south of the Project Site. Due to the Bixel and Lucas Project's proximity of the Project Site, it is the only related project that may contribute to a cumulative shade and shadow impact with the Proposed Project. The Bixel and Lucas Project DEIR (ENV-2007-5887-EIR) concluded that the project would create a less than significant shade and shadow impact in regards to the Specific Plan thresholds and the L.A. City Thresholds Guidelines. The Bixel and Lucas Project site has the land use categories of C2(CW)-U/3 and C4(CW)-U/4.5. As such, the shadow requirements of the Specific Plan apply, and the Bixel and Lucas Project shall not cast shadows on a lot located in the R3 or R4 Zone or the R4(CW) or RC4(CW) Land Use Category for more than two (2) hours each day between the hours of 9 AM and 3 PM on the Winter Solstice and 9 AM and 5 PM on the Summer Solstice. Similar to the Project, all properties within the Bixel and Lucas Project's potential shadow envelope are not R3 or R4 Zones or the R4(CW) or RC4(CW) Land Use Categories. As such, although the Proposed Project and the Bixel and Lucas Project would increase shading in the Project Site area, the shadows from the Proposed Project and the Bixel and Lucas Project would not combine to create a cumulative impact pursuant to the Specific Plan. Furthermore, under SB 743, mixed-use residential projects located on infill development sites within Transit Priority Areas shall not be considered to have significant impacts on the environment related to aesthetics. Because the Proposed Project and the Bixel and Lucas Project are mixed-use residential projects located on an infill site within a Transit Priority Area as defined by CEQA and identified by the City of Los Angeles, the Proposed Project's impacts on aesthetic resources, shall not be considered significant impacts on the environment.

c. Project Design Features

The Project would implement the following specific project design features with regards to aesthetics, views, and light/glare.

PDF A-1: On-site utilities that serve the Proposed Project shall be installed underground, as recommended by the Department of Building and Safety and Department of Water and Power.

PDF A-2: The Proposed Project shall include low-level directional lighting at the ground and podium levels of the exterior of the proposed structures to reduce light spillover onto adjacent properties.

PDF A-3: Glass used in building facades and windows shall minimize glare (e.g., minimize the use of glass with mirror coatings). Consistent with applicable energy and building code requirements, including Section 140.3 of the California Energy Code as may be amended, glass with coatings required to meet the Energy Code requirements shall be permitted.

2. Air Quality

a. Project Impacts

Consistency with the 2016 AQMP

The Proposed Project would be consistent with the growth projections of the General Plan and regional growth forecasts and would therefore also be consistent with the 2016 AQMP. The AQMP consistency analysis is based on two criteria for consistency with regional plans and the regional AQMP adopted by the SCAQMD: (1) Will the Project increase the frequency or severity of existing air quality violations or cause or contribute to new air quality violations?; and (2) Will the Project exceed the assumptions utilized in preparing the AQMP?

With respect to the first criteria, area air quality planning, including the AQMP, assumes that there will be emissions from new growth, but that such emissions may not impede the attainment and may actually contribute to the attainment of applicable air quality standards within the Basin. As discussed in more detail below, the Project would not result in construction or operational air quality emissions that exceed the SCAQMD thresholds of significance at the project level. Additionally, the Project's construction-related emissions would be temporary in nature, lasting only for the duration of the construction period, and would not have a long-term impact on the region's ability to meet state and federal air quality standards. Furthermore, the Project would be required to comply with applicable SCAQMD rules and regulations for new or modified sources. For example, the Project must comply with SCAQMD Rule 403 for the control of fugitive dust during construction. According to the SCAQMD, the application of water to disturbed areas three times a day has a control efficiency of 61 percent. By meeting SCAQMD rules and regulations, Project construction activities would be consistent with the goals and objectives of the AQMP to improve air quality in the Basin. As discussed in further detail below, with respect to operations, the Proposed Project would not introduce substantial stationary sources of emissions. As such, CO is the preferred benchmark pollutant for assessing local area air quality impacts from post-construction motor vehicle operations. Based on methodologies set forth by the SCAQMD, one measure of local area air quality impacts that can indicate whether the Project would cause or affect a violation of an air quality standard would be based on the estimated CO concentrations at selected receptor locations located in close proximity to the Project Site. As discussed in further detail below, development of the Proposed Project would not expose any possible sensitive receptors (such as residential uses, schools, hospitals) to substantial localized CO concentrations. Thus, the Proposed Project would not have the potential to increase the frequency or severity of existing air quality violations or cause or contribute to new air quality violations.

With respect to the second criteria, the AQMP was prepared to achieve national and state air pollution standards within the region. Projects that are consistent with the projections of employment, population and housing forecasts identified by SCAG are considered to be consistent with the AQMP growth projections since the forecast assumptions by SCAG forms the basis of the land use and transportation control portions of the AQMP. As discussed in Sections IV.G, Land Use Planning, and IV.I, Population, Housing, and Employment, the Project would not exceed the population and housing projections of the 2016-2040 RTP/SCS for the Los Angeles subregion and would not jeopardize attainment of the air quality conditions projected in the AQMP. Accordingly, through evaluation of the Project against the two criteria for consistency with regional plans and the regional AQMP, impacts with respect to regional plans and AQMP consistency would be less than significant.

Consistency with General Plan Air Quality Element

The City's Air Quality Element sets forth the goals, objectives, and policies that would guide the City in the implementation of its air quality improvement programs and strategies. As shown in Table IV.B-7 of the Draft EIR, the Project would be consistent with the applicable goals, objectives, and policies set forth in the City's General Plan Air Quality Element. Therefore, impacts related to consistency with the applicable air quality policies in the General Plan would be less than significant.

Construction Impacts

Construction of the Proposed Project would generate construction related air quality emissions that are below the maximum daily threshold levels of significance for the following criteria

pollutants: ROG, NO_X, CO, SO_X, PM_{10} and $PM_{2.5}$ emissions. As such, the Proposed Project would result in less than significant regional construction air quality impacts.

On-Site Construction Activities

Construction activities associated with the Project would be undertaken in six main activities: (1) demolition, (2) site clearing/preparation, (3) grading/ excavation, (4) building construction, (5) paving, and (6) architectural coatings/finishing. The building construction phase includes the construction of the proposed buildings, connection of utilities to the buildings, laying irrigation for landscaping, architectural coatings, paving, and landscaping the Project Site.

The Demolition/Site Clearing Phase would include the demolition of approximately 111,272 gross square feet of the existing buildings and the three-level parking structure on the Project Site. In addition, this phase would include the removal of street trees, walls, fences, and parking lot related debris. The demolition/site clearing would be completed in approximately two to three months.

The excavation phase for the Proposed Project would occur for approximately 4 months and would involve the cut and fill of land to ensure the proper base and slope for the building foundations. The Proposed Project would require approximately 99,151 cubic yards of soil to be hauled off-site in order to build the subterranean parking garages. Haul trips would occur outside of the peak hours and during the permissible hauling hours. In accordance with Sections 2485 in Title 13 of the California Code of Regulations, the idling of all diesel fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location. Additionally, in accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards.

The building construction phase consists of below grade and above grade structures and is expected to occur for approximately 12 months. Upon completion of the structures, architectural coating, finishing, and paving would occur. It is estimated that architectural coatings would occur over the final four months of the building construction phase, and paving would occur during the final month of construction. The Project would comply with South Coast Air Quality Management District Rule 1113 limiting the volatile organic compound content of architectural coatings.

Construction activities may necessitate temporary lane closures on streets adjacent to the Project Site on an intermittent basis for utility relocations/hook-ups, delivery of materials, and other construction activities as may be required. However, site deliveries and the staging of all equipment and materials would be organized in the most efficient manner possible on-site to mitigate any temporary impacts to the neighborhood and surrounding traffic. Construction equipment would be staged on-site for the duration of construction activities. Traffic lane and right-of-way closures, if required, would be properly permitted by the City agencies and will conform to City standards.

All construction activities would be performed in accordance with all applicable state and federal laws and City Codes and policies with respect to building construction and activities. As provided in Section 41.40 of LAMC, the permissible hours of construction within the City are 7:00 a.m. to 9:00 p.m. Monday through Friday, and between 8:00 a.m. and 6:00 p.m. on any Saturday or national holiday. No construction activities are permitted on Sundays. The Proposed Project would comply with these restrictions.

Haul Route

All construction and demolition debris would be recycled to the maximum extent feasible. Demolition debris and soil materials from the Project Site that cannot be recycled or diverted would be hauled to the Sunshine Canyon or Chiquita Canyon landfills, which accept construction and demolition debris and inert waste from areas within the City of Los Angeles. The Sunshine Canyon Landfill is approximately 30 miles northwest of the Project Site (approx. 60 miles round trip). The Chiquita Canyon landfill is approximately 40 miles to the northwest of the Project Site (approx. 80 miles round trip). For recycling efforts, the Central L.A. Recycling Center and Transfer Station accepts construction waste for recycling and is located approximately 4 miles from the Project Site (approx. 8 miles round trip).

It is anticipated that the excavation and soil export would involve 18-wheel bottom-dump trucks with a 20 cubic yard hauling capacity (i.e., 30 tons maximum gross weight). All truck staging would either occur on-site or at designated off-site locations and radioed into the site to be filled. The local haul route to and from the Harbor (I-110) Freeway would utilize 6th Street, which is designated as an Avenue II roadway; Figueroa Street, which is designated as a Boulevard II roadway; Wilshire Boulevard, which is designated as an Avenue II roadway; Bixel Street, which is designated as an Avenue II roadway; and 5th Street, which is designated as a Collector Street. The haul route specified above may be modified in compliance with City policies, provided DOT and/or Street Services approves any such modification.

As required by SCAQMD Rule 403 (Fugitive Dust), appropriate dust control measures would be implemented as part of the Proposed Project during each phase of development. Rule 403 control requirements include, but are not limited to: applying water in sufficient quantities to prevent the generation of visible dust plumes; applying soil binders to uncovered areas; reestablishing ground cover as quickly as possible; utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project Site; and maintaining effective cover over exposed areas. As shown in Tables IV.B-8, the peak daily emissions generated during the construction phases of the Proposed Project would not exceed the regional emission thresholds recommended by the SCAQMD. Therefore, regional air quality impacts associated with Project-related construction emissions would be less than significant impact.

Local Air Quality Impacts

Construction related activities would result in a less than significant localized air quality emissions as the Project's construction emissions would not exceed the SCAQMD's localized thresholds for NO_X, CO, PM_{10}, or $PM_{2.5}$ for any sensitive land uses in the vicinity of the Project Site.

The daily on-site construction emissions generated by the Project are analyzed against the SCAQMD's localized significance thresholds to determine whether the emissions would cause or contribute to adverse localized air quality resulting in impacts to sensitive receptors. The area surrounding the Project Site is mostly populated with educational, hospital, and residential sensitive receptors, with the closest sensitive receptor within 82 feet (or 25 meters) of the Project Site is Para Los Niños – Evelyn Thurman Gratts Primary School. These calculations assume that appropriate dust control measures would be implemented as part of the Proposed Project during each phase of development, as specified by SCAQMD Rule 403 (Fugitive Dust). Rule 403 control requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project Site, and maintaining effective cover over exposed areas.

The closest receptor distance provided in the SCAQMD's Mass Rate LST Look-up Tables is 82 feet (25 meters). SCAQMD's LST methodology states that projects with boundaries located closer than 82 feet (25 meters) from the nearest receptor should use the LSTs for receptors located at 82 feet. Construction of the Proposed Project would require the grading of approximately 1.92 acres. As shown in Draft EIR Table IV.B-9, Localized On-Site Peak Daily Construction Emissions, on-site emissions generated by the Proposed Project would not exceed the established SCAQMD localized thresholds based on a Project Site of 2 acres. Therefore, the localized air quality impacts resulting from construction emissions associated with the Project would be less than significant.

Operational Impacts

The Project's operational activities would generate regional air quality emissions that are below the maximum daily threshold levels of significance for ROG, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$ emissions. As such, the Proposed Project would result in less than significant regional operational air quality impacts.

Operational emissions generated by both stationary and mobile sources would result from normal day-to-day activities on the Project Site after occupancy. As stated previously, emissions would be generated by motor vehicles traveling to and from the Project Site, energy use, architectural coatings, (paint re-application once every ten years) consumer products, hearth, and the operation of landscape maintenance equipment.

As shown in Table IV.B-10 in the Draft EIR, the operational emissions associated with the Project would not exceed the established SCAQMD threshold levels during the summertime (smog season) and wintertime (non-smog season). Additionally, the Project would meet the energy efficiency requirements of the L.A. Green Building Code. Specifically, the Project would be designed to exceed California Building Efficiency Standards; would reduce potable water consumption through the use of low-flow water fixtures; and provide ENERGY STAR labeled appliances in the residential units. New on-site facility nitrogen oxide emissions would be minimized through the use of emission control measures (e.g., use of best available control technology for new combustion sources such as boilers and water heaters) as required by South Coast Air Quality Management District Regulation XIII, New Source Review. Therefore, impacts associated with regional operational emissions from the Project would be less than significant.

Localized Operational Air Quality Impacts

Operation of the Proposed Project would result in a less than significant localized air quality impact as the Project's operational emissions would be below SCAQMD LST levels.

Localized Mobile Source Emissions

With regard to localized emissions from motor vehicle travel, traffic congested roadways and intersections have the potential to generate localized high levels of carbon monoxide (CO). The SCAQMD suggests conducting a CO hotspots analysis for any intersection where a project would worsen the Level of Service (LOS) to any level below C, and for any intersection rated D or worse where the project would increase the V/C ratio by two percent or more. Based on a review of the Project's Traffic Impact Study, all ten study intersections are estimated to operate at LOS B or better under the Existing Plus Project (2015) conditions. Under the Future (Cumulative) With Project (2019) scenario, seven of the ten intersections would operate at LOS C or better and four

intersections would operate at LOS D or better. Of the four intersections that would operate at LOS D under the Future (Cumulative) With Project (2019) scenario, the change in V/C ratio attributable to the Proposed Project would be less than 2 percent. Therefore, the localized CO emissions would be below the SCAQMD's screening criteria and no further analysis for CO hotspots is warranted. Furthermore, as demonstrated in the 2003 AQMP, the traffic conditions at the four most heavily congested intersections in the Basin were demonstrated to generate CO emissions below the AQMD's thresholds of significance for 1-hour and 8-hour CO concentrations, respectively. Based on a comparative assessment of the traffic volumes at each of the ten study intersections, improved ambient CO concentrations, and cleaner vehicle emissions, it is reasonable to conclude that localized operational emissions would be less than significant without further analysis.

Toxic Air Contaminants Impacts

The Proposed Project consists of a mixed-use development containing apartments and commercial uses and would not support any land uses or activities that would involve the use, storage, or processing of carcinogenic or non-carcinogenic toxic air contaminants. As such no significant toxic airborne emissions would result from on-site activities. The primary sources of potential air toxics associated with Project operations include diesel particulate matter from delivery trucks. However, these activities, and the land uses associated with the Project, would not generate substantial TAC emissions. It should be noted that the SCAQMD only recommends that health risk assessments be conducted for substantial sources of diesel particulate matter and has provided guidance for analyzing mobile source diesel emissions. Based on this guidance, the Project is not considered to be a substantial source of diesel particulate matter warranting a refined HRA since daily truck trips to the Project Site would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units.

The greatest potential for TAC emissions during construction would be from diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of TACs over a 70-year lifetime will contract cancer based on the use of standard risk-assessment methodology. Because the construction schedule estimates that the phases which require the most heavy-duty diesel vehicle usage, such as site grading/excavation, would last for a relatively short duration (e.g., approximately 4 months), construction of the Project would not result in a substantial, long-term (i.e., 70-year) source of TAC emissions. Additionally, the SCAQMD CEQA guidance does not require a health risk assessment (HRA) for short-term construction emissions. It is, therefore, not necessary to evaluate long-term cancer impacts from construction activities which occur over a relatively short duration. In addition, there would be no residual emissions or corresponding individual cancer risk after construction. As such, Project-related TAC impacts during construction would be less than significant.

Odor Impacts

The Proposed Project does not include any of the uses identified by the SCAQMD as being associated with odors (such as agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, or fiberglass molding). In addition, SCAQMD Rule 402 (Nuisance), and SCAQMD Best Available Control Technology Guidelines would limit potential objectionable odor impacts during the Project's long-term operations phase.

Potential sources that may emit odors during construction activities include the use of architectural coatings and solvents as well as asphalt paving. SCAQMD Rules 1108 and 1113 limit the amount of volatile organic compounds from cutback asphalt and architectural coatings and solvents, respectively. Based on mandatory compliance with SCAQMD Rules, no construction activities or materials that would create a significant level of objectionable odors are proposed.

The Project would not create objectionable odors affecting a substantial number of people during construction or long-term operation. The Project's residential uses would not generate a source of odors. Odors from garbage shoots and refuse containers would be controlled through standard best management practices and ongoing building maintenance procedures. While restaurant-related uses have the potential to generate odors from cooking and disposal of organic waste, restaurant operators would be subject to South Coast Air Quality Management District Rule 1138, which requires the installation of odor-reducing equipment. Therefore, a less than significant impact would occur with respect to the creation of objectionable odors.

b. Cumulative Impacts

AQMP Consistency

Cumulative development can affect implementation of the AQMP. The AQMP was prepared to accommodate growth, reduce pollutants within the areas under SCAQMD jurisdiction, improve the overall air quality of the region, and minimize the impact on the economy. Growth considered to be consistent with the AQMP would not interfere with attainment because this growth is included in the projections utilized in the formulation of the AQMP. Consequently, as long as growth in the Basin is within the projections for growth identified by SCAG, implementation of the AQMP would not be obstructed by such growth and cumulative impacts would be less than significant. Since the Proposed Project is consistent with SCAG's growth projections, it would not have a cumulatively considerable contribution to an impact regarding a potential conflict with or obstruction of the implementation of the applicable air quality plan. Thus, cumulative impacts related to conformance with the AQMP would be less than significant.

Construction Impacts

Because the Basin is currently in state non-attainment for O3, PM_{10}, and $PM_{2.5}$, cumulative development could violate an air quality standard or contribute to an existing or projected air quality violation. This is considered to be a significant cumulative impact. According to the SCAQMD, individual construction projects that exceed the SCAQMD recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment. As discussed previously, construction emissions associated with the Proposed Project would not exceed the SCAQMD's regional thresholds of significance. Therefore, the cumulative impact of the Proposed Project for construction emissions would be considered less than significant.

With respect to TACs, the greatest potential for TAC emissions at related projects would involve diesel particulate emissions associated with heavy equipment. The construction activities associated with the Proposed Project and related projects would be similar to other development projects in the City, and would be subject to the regulations and laws relating to toxic air pollutants at the regional, state, and federal level that would protect sensitive receptors from substantial concentrations of these emissions. In addition and similar to the Proposed Project, related projects construction activity would not result in long-term substantial sources of TAC emissions (i.e., 70 years) and would not combine with the Project to generate ongoing TAC emissions. Thus,

cumulative TAC emissions from the Proposed Project and related projects would be considered less than significant.

With respect to odor impacts, potential sources that may emit odors during construction activities at each related project include the use of architectural coatings, solvents, and asphalt paving. SCAQMD Rules 1108 and 1113 limit the amount of volatile organic compounds from cutback asphalt and architectural coatings and solvents, respectively. Based on mandatory compliance with SCAQMD Rules, it is anticipated that construction activities and materials used in the construction of the Proposed Project and related projects would not combine to create objectionable odors. Thus, cumulative odor impacts are considered less than significant.

Operational Impacts

Due to the state non-attainment status of O3, PM_{10}, and $PM_{2.5}$ standards in the Basin, the generation of daily operational emissions associated with cumulative development would result in a cumulative significant impact associated with the cumulative net increase of any criteria pollutant for which the region is in non-attainment. With respect to operational emissions, the SCAQMD has indicated that if an individual project results in air emissions of criteria pollutants (CO, ROG, NOx, SOx, PM10, and PM2.5) that exceed the SCAQMD recommended daily thresholds for project-specific impacts, then it would also result in a cumulatively considerable net increase of these criteria pollutants for which the Proposed Project region is in non-attainment under an applicable federal or state ambient air quality standard. As discussed previously, the operational emissions associated with the Proposed Project would not exceed the established SCAQMD threshold levels during the summertime (smog season) and wintertime (non-smog season). Therefore, the cumulative impact of the Proposed Project for operational emissions would be considered less than significant.

Localized CO Impacts

As discussed previously, the Basin has been in attainment for CO emissions since 2003. In the 2003 AQMP, the SCAQMD demonstrated that CO hotspot emissions at four of the highest traveled intersections in the Basin were below the thresholds of significance. Thus, since the Basin has remained in attainment status since 2003, and the volume of traffic at the ten study intersections is well below the 100,000 trips per day, it is reasonable to conclude that cumulative localized CO impacts would not exceed the screening level thresholds of significance described above for the future cumulative With Project scenario and localized operational air quality impacts would be less than significant without further analysis.

c. Project Design Features

No project design features were identified or proposed for air quality impacts.

3. Greenhouse Gas Emissions

a. Project Impacts

Estimated Construction GHG Emissions

Construction of the Proposed Project would generate approximately 1,638 metric tons of CO_2e over an estimated 24-month construction time period. The Proposed Project would comply with

all applicable regulations and policies with respect to construction activities, and as such, would result in a less than significant impact with respect to greenhouse gas emissions during construction.

Estimated Operational GHG Emissions

Operation of the Project would generate approximately 585.71 net metric tons of CO_2e per year. The Proposed Project would be consistent with AB 32, SCAG's 2016-2040 SCS/RTP, SB 375, and applicable provisions of the City's Green Building Code and would therefore result in a less than significant impact with respect to the generation of greenhouse gas emissions.

Plan Consistency

For purposes of demonstrating the Project's consistency with AB32 and the State's goals for reducing GHG emissions to 1990 levels by 2020, the Project's greenhouse gas emissions were quantified under the CalEEMod software's mitigated scenario to reflect the Project being an infill development, providing increased density in a walkable urban center with accessibility to transit, the pre-installation of energy efficient Energy Star rated appliances, and as otherwise being built in compliance with all applicable Green Building Code requirements. In order to demonstrate the efficacy of these measures required under the applicable GHG reduction plans and policies, and building code regulations, implemented for the purposes of reducing GHG emissions, this analysis compares the Project's GHG emissions to the emissions that would be generated by the Project in the absence of any GHG emission reduction measures (the no action taken or "NAT" scenario).

The Project's net annual generation of GHG emissions is estimated to be 585.71 CO2e MTY. The Proposed Project's gross operational emissions represent an approximate 31 percent reduction from the emissions estimates for the NAT scenario. As discussed above, the NAT comparison approach mirrors the concepts used in the CARB's Climate Change Scoping Plan for the implementation of AB 32. However, as used in this analysis, this methodology is used to analyze consistency with the applicable GHG reduction plans and policies and demonstrate the efficacy of the measures contained therein, but it is not a threshold of significance.

The Project is a mixed-use high-density residential/commercial redevelopment project located in a highly urbanized portion of the Westlake Community near mass transit and a broad mix of land uses. As noted in the Project Traffic Study, the Proposed Project's mix of residential, retail, and restaurant space, close proximity to transit, and location near a broad mix of existing land uses results in a net reduction of approximately 1,722 daily trip ends as a result of internal trip capture, pass by trip credits, and transit adjustments. An additional 2,159 vehicle trips would be eliminated as a result of the redevelopment of a Project Site that is currently developed with active medical office and retail land uses. With these credit adjustments, the Project would result in a net increase of only 587 daily trip ends, as compared to 4,468 trips that would result from a project without these trip reduction characteristics. Based on these factors, the Project would be consistent with the intent of both AB 32 and SB 375 with respect to reducing mobile source emissions associated with the Project's trip generation. The following describes the specific design features and compliance actions that would further reduce the carbon footprint of the development:

1. In Fill Development. The Project is located on an infill development site that is currently developed with medical office and retail uses. The redevelopment of the Project Site would recycle an existing developed property and would provide a significant reduction to the GHG emissions which would otherwise be generated if the Project was located on a vacant site. As shown in Table IV.E-6, above,

approximately 3,516.52 CO2e MTY that is currently generated by the existing land uses would be eliminated.

2. GHG Emissions Associated with Energy Demand. The Proposed Project would be constructed to Title 24 2016 standards and include pre-installed ENERGY STAR-rated appliances. Energy Star-rated appliances would reduce the projects energy demand during the operational life of the project. The Proposed Project would also be subject to the more stringent standards of the LA Green Building Code, which As shown in Table IV.E-6, above, the Proposed Project would achieve an approximate 12 percent reduction in building energy use as compared to the NAT scenario.

3. GHG Emissions Associated with Solid Waste Generation. California Green Building Code Section 4.408.1, imposes mandatory measures for residential projects that require developers to recycle and/or salvage for reuse a minimum of 50 percent of the nonhazardous construction and demolition waste in accordance with either Section 4.408.2, 4.408.3 or 4.408.4, or meet a more stringent local construction and demolition waste management ordinance. Pursuant to LAMC Section 99.04.408, the Project shall meet a construction waste reduction of at least 50 percent. Data from CalRecycle's report, 2014 Disposal Facility – Based Characterization of Solid waste in California, shows that materials, such as organics, that decompose in landfills and generate methane comprise a significant portion of the waste stream. Methane is a potent SLCP with a global warming potential 25 times greater than that of carbon dioxide on a 100-year time horizon and more than 70 times greater than that of carbon dioxide on a 20-year time horizon. As such, a 50 percent reduction of a Project's waste stream to the local landfill would reduce methane emissions and thus lower the Project's contribution to global GHG emissions.

4. Electric Vehicle Supply Equipment. In 2015, the City of Los Angeles amended the L.A. Green Building Code to incorporate requirements for the installation of electric vehicle charging equipment for new construction (See LAMC 99.04.106.4). Under LAMC 99.04.106.4.2, at least 5 percent of the total parking spaces are required to be capable of supporting future electric vehicle supply equipment (EVSE). As a project design feature, to encourage carpooling and the use of electric vehicles by Project residents and visitors, at least twenty percent (20%) of the total code-required parking spaces provided for all types of parking facilities, but in no case less than one location, shall be capable of supporting future EVSE. Plans shall indicate the proposed type and location(s) of EVSE and also include raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to simultaneously charge all electric vehicles at all designated EV charging locations at their full rated amperage. Plan design shall be based upon Level 2 or greater EVSE at its maximum operating ampacity. Only raceways and related components are required to be installed at the time of construction. When the application of the 20% results in a fractional space, the required number of spaces would be rounded up to the next whole number. A label stating "EVCAPABLE" shall be posted in a conspicuous place at the service panel or subpanel and next to the raceway termination point.

5. Reduction in Nitrogen Oxide Emissions. As discussed in Section IV.B, Air Quality, as required by SCAQMD District Regulation XIII, New Source Review, the Project

shall use the best available control technology for new combustion sources such as boilers and water heaters to reduce new on-site facility nitrogen oxide emissions. The reduction of nitrogen oxide emissions would have a direct reduction in GHG emissions as N2O has a GWP of 310 and is a direct contributor to GHGs.

Consistency with AB 32 Scoping Plan

The Proposed Project would be substantially consistent with greenhouse gas reduction policies associated with energy efficiency, green building strategies, recycling and waste reduction, and water conservation.

Consistency with SB 375

California SB 375 requires integration of planning processes for transportation, land-use and housing. Under the bill, each Metropolitan Planning Organization would be required to adopt a Sustainable Community Strategy (SCS) to encourage compact development that reduces passenger vehicle miles traveled and trips so that the region will meet the target provided in the Scoping Plan, created by CARB, for reducing GHG emissions. SB 375 requires SCAG to direct the development of the SCS for the region. A discussion of the Project's consistency with the SCS is provided further below.

Consistency with 2016-2040 RTP/SCS

The Project would be consistent with the following key GHG reduction strategies in SCAG's 2016-2040 RTP/SCS which are based on changing the region's land use and travel patterns:

- Compact growth in areas accessible to transit;
- More multi-family housing;
- Jobs and housing closer to transit;
- New housing and job growth focused in High Quality Transit Areas (HQTA); and
- Biking and walking infrastructure to improve active transportation options, transit access.

By analyzing the performance of land use changes and transportation strategies related to GHG emissions reductions, the 2016-2040 RTP/SCS concluded that GHG emissions per capita relative to 2005 emissions would be reduced by 8% in 2020, 18% in 2035, and 21% in 2040 in the SCAG region, which would exceed CARB's required reduction targets. These future GHG goals and conditions would be met in 2040 if investments and strategies detailed in the 2016 RTP/SCS are fully realized.

The Project is classified as a mixed-use residential project and is located on an infill site within a Transit Priority Area as defined by CEQA. The City of Los Angeles identifies the Project Site as being within a Transit Priority Area per the Department of City Planning's Zoning Information File ZI No. 2452, Transit Priority Areas (TPAs) / Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA. Similar to a Transit Priority Area, SCAG defines an area within one-half mile of a fixed guideway transit stop or within a transit corridor where buses pick up passengers at a frequency of every 15 minutes or less during commuting hours as a High-Quality Transit Area (HQTA). HQTAs account for only three percent of the total land area in the SCAG region, but are projected to accommodate 46% of the region's future household growth and 55% of the future employment growth.

In addition to being within a High Quality Transit Area, the Project would also provide on-site bicycle storage areas for Project residents and guests to facilitate and encourage alternative modes of transit. The Project would provide residents and visitors with convenient access to public transit and opportunities for walking and biking, which would facilitate a reduction in vehicle miles traveled and related vehicular GHG emissions. Ideally, with the provision of better transit options, commuters will choose that option over driving alone in their automobiles, further reducing vehicle miles traveled and regional greenhouse gas emissions, which would be consistent with the goals of SCAG's 2016-2040 RTP/SCS of reducing GHG emissions per capita by 8% in 2020, 18% in 2035, and 21% in 2040.

Consistency with L.A. Green Building Code

The Los Angeles Green Building Ordinance requires that all projects filed on or after January 1, 2014, must comply with the L.A. Green Building Code. As stated above, pursuant to LAMC 99.04.106.4.2, at least 5 percent of the total parking spaces are required to be capable of supporting future electric vehicle supply equipment (EVSE). As a project design feature, at least twenty (20)% of the total code-required parking spaces provided for all types of parking facilities will be fitted with electric vehicle charging stations (refer to PDF E-1, below). Furthermore, the Proposed Project would include various other measures such as, but not limited to, installing Energy Star rated appliances and installation of water-conserving fixtures throughout the residential area. Where applicable the Project would be consistent with the provisions of the L.A. Green Building Code, and greenhouse gas emissions would be less than significant.

b. Cumulative Impacts

Although the Project is expected to emit GHGs, the emission of GHGs by a single project into the atmosphere is not itself necessarily an adverse environmental effect. Rather, it is the increased accumulation of GHG from more than one project and many sources in the atmosphere that may result in global climate change. The resultant consequences of that climate change can cause adverse environmental effects. A project's GHG emissions typically are relatively very small in comparison to state or global GHG emissions and, consequently would, in isolation, have no significant direct impact on climate change. The Proposed Project's GHG emissions would not be considered to be substantial when compared to California's statewide GHG emissions.

Given the Project's consistency with State, regional, and City GHG emissions reduction goals and objectives described in this Section, its contribution to the cumulative impact of global climate change would be less than significant and would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. Similarly, related projects would also be subject to these emissions reduction goals and objectives (e.g., the L.A. Green Building Code). Therefore, the potential impact on climate change resulting from implementation of the Project in combination with the related projects would not result in a cumulative impact.

c. Project Design Features

The following Project Design Feature was identified for greenshouse gas emissions.

PDF E-1 The project shall provide that at least twenty percent (20%) of the total Code-required parking spaces provided for all types of parking facilities shall be capable of supporting future electric vehicle supply equipment (EVSE). Plans shall indicate the proposed type and location(s) of EVSE and also include raceway method(s),

wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to simultaneously charge all electric vehicles at all designated EV charging locations at their full rated amperage. Plan design shall be based upon Level 2 or greater EVSE at its maximum operating capacity. Of the 20% EV Ready, five percent (5%) of the total Code-required parking spaces shall be further provided with EV chargers to immediately accommodate electric vehicles within the parking areas. Otherwise, only raceways and related components are required to be installed at the time of construction. A label stating "EVCAPABLE" shall be posted in a conspicuous place at the service panel or subpanel and next to the raceway termination point. When the application of either the 20% or 5% results in a fractional space, round up to the next whole number.

4. Land Use and Planning

a. Project Impacts

The proposed Project is substantially consistent with the applicable goals and policies of the City of Los Angeles General Plan, the Westlake Community Plan and the Central City West Specific Plan.

Los Angeles Municipal Code (LAMC)

Pursuant to the LAMC, the Project Site is zoned "CW," which indicates that the development specifications on the Project Site are established by the Central City West Specific Plan. The Project Site has a land use category of R5(CW)-U/6 on the parcels fronting 5th Street; C4(CW)-U/4.5 on the parcels fronting Bixel Street and the three abutting parcels on 6th Street; and C2(CW)-U/3 on the parcels two remaining parcels on 6th Street. The General Plan land use designation for the Project Site is Community Commercial across the C2(CW)-U/3 parcels; Regional Center Commercial across the C4(CW)-U/4.5 parcels; and high density residential on the R5(CW)-U/3 parcels. With discretionary approval of the entitlement requests, development of the Proposed Project would be consistent with the provisions of the LAMC.

City of Los Angeles General Plan

The Proposed Project supports the Framework Element's housing objectives by increasing the housing supply and diversity within the City of Los Angeles that help meet the housing needs of City residents, by placing multi-family housing in a transit-rich area, and by conserving the scale and character of the surrounding residential community. With respect to the Project Site's location within an identified Regional Center, the Proposed Project would promote the goals and objectives for Regional Centers. The Proposed Project includes a mixed-use development that would place residences near job opportunities, entertainment, cultural facilities, and supporting services. Further, the Project Site is located within a Transit Priority Area as defined by CEQA; as such, the Proposed Project would place residents within close proximity to bus and rail lines.

Framework Element

While the purpose of the Framework Element is to guide citywide goals, the Proposed Project would promote the Framework Element's objectives for development within a Regional Center. The Proposed Project includes the construction of a mixed-use development that would include ground-floor commercial uses and upper-stories residential units in close proximity to multiple transit opportunities. The Proposed Project would promote and support pedestrian activity within the Project Site area by providing a pedestrian-scale development with ground-floor retail oriented

towards the public right-of-way and easily accessible on foot. The Proposed Project's outdoor patio area, landscaping, and security lighting would further activate the public right-or-way around the Project Site.

The Framework Element states that floor area ratios within a Regional Center range from 1.5:1 to 6:0. The Proposed Project includes an FAR of 4.51, which is consistent with development within a Regional Center. Additionally, the Framework Element states that Regional Centers are characterized by 6- to 20-stories (or higher) buildings. The Proposed Project includes seven-stories above grade, which is consistent with the Framework Element.

Housing Element

The Proposed Project would promote the objectives of the Housing Element. Table IV.G-1 in the Draft EIR, provides a project consistency analysis with the applicable objectives of the Housing Element. As discussed in the Draft EIR the Proposed Project would generally conform to the following objectives identified in the Housing Element of the General Plan: Objective 1.1, 1.2, 2.1, 2.2, 2.3, 2.4, 3.1, and 3.2.

Air Quality Element

The Proposed Project is an infill, mixed-use development that would place residences and retail in proximity to many transit options and in walking distance from multiple services and amenities. The Proposed Project is located within a transit priority area as defined by CEQA and identified by the City of Los Angeles. The Proposed Project's proximity to transit and infill and mixed-use nature promote energy efficiency and the relationship between residential land uses and transportation. The Proposed Project would reduce dependence on single-occupancy vehicles and promote the use of alternative transit options.
As discussed in Section IV.B, Air Quality of the Draft EIR, the Proposed Project would result in a less than significant impact during its construction and operational phases. The Proposed Project would comply with applicable provisions of the Los Angeles Green Building Code, which would further reduce emissions associated with the Proposed Project. Therefore, the Proposed Project would promote good air quality with continued population growth and a healthy economic environment consistent with the City's goals within the Air Quality Element.

Conservation Element

The Conservation Element focuses on the conservation and preservation of natural resources and historical and cultural resources within the City of Los Angeles. The Proposed Project is an infill development project located within a highly developed area with no natural resources existing on-site. As discussed in Section IV.C, Cultural Resources in the Draft EIR, the Proposed Project would result in the demolition of two historic resources. The existing structures located at 1111 and 1125 West 6th Street are recognized as historic resources pursuant to CEQA and would be demolished as a result of the Proposed Project. Therefore, the Proposed Project would not be consistent with the Conservation Element's objective and policy for protecting important cultural and historical sites and resources for historical, cultural, research, and community educational purposes and for protecting historic and cultural sites and/or resources potentially affected by proposed land development, demolition or property modification activities.

There are no known or recorded archaeological, paleontological or Native American Tribal resources within the Project Site. In the unlikely event that archaeological, paleontological, or Native American Tribal resources are encountered during construction activities, the Proposed

Project would comply with all regulatory compliance measures providing procedures in the event of a find. Additionally, the Proposed Project would implement Mitigation Measure MM C-2. As such, development of the Proposed Project would have less than significant impact upon archeological resources, paleontological resources, and/or Native American cultural resources. The Proposed Project would support the Conservation Element's objective and policy relating to protecting the City's archaeological and paleontological resources for historical, cultural, research, and/or educational purposes and protecting significant archaeological and paleontological sites and/or resources known to exist or that are identified during land development, demolition or property modification.

As such, the Proposed Project would not comply with the Conversation Element with respect to buildings, but would comply with the Conservation Element with respect to preserving archeological, paleontological and Native American Tribal resources.

Safety Element

The Proposed Project would result in a less than significant impact with the incorporation of identified mitigation measures. The Proposed Project is not expected to create a risk of injury, loss of life, property damage, or disrupt the social and economic life of the City due to fire, water hazard, seismic event, geologic conditions, or release of hazardous materials. Further, the Project Site is and would continue to be adequately served by the Los Angeles Fire Department and the Los Angeles Police Department. The Proposed Project is not expected to interfere or hinder emergency vehicles response times. The Proposed Project would be designed and construction in consultation with appropriate City agencies and departments, including but not limited to the Department of Building and Safety, LAFD, and the Department of Transportation, to ensure that the Proposed Project would not create or introduce any hazardous features. Therefore, the Proposed Project would promote the Safety Element.

Mobility Plan 2035

The Proposed Project would promote the goals of the Mobility Plan. The Proposed Project is located within a transit priority area, pursuant to the SB 743, and would promote the use of alternative transportation systems. The Proposed Project would enhance pedestrian mobility in the area by providing limited curb cuts along 6th Street and no new curb cuts along 5th Street and Bixel Street. The Proposed Project would also provide bicycle parking and streetscape improvements to support pedestrian activity.

The Mobility Plan has reclassified the City's arterial street to a new system. The Proposed Project would not create a significant impact at any of the ten study intersections. Access to the Proposed Project would be designed and constructed in consultation with the Los Angeles Department of Transportation and would not include unusual or hazardous design features. As such, the Proposed Project promotes the goals of the Mobility Plan.

Noise Element

The Proposed Project would implement all technically feasible noise attenuation measures to ensure that noise impacts during the construction phase would reduce noise levels to the maximum extent that is technically feasible. With the incorporation of mitigation measures, construction of the Proposed Project would result in a significant and unavoidable impact, even after mitigation, on a temporary and intermittent basis. However, the Proposed Project would not

conflict with the Noise Element, because construction noise is temporary and would only last the length of the construction period.

In accordance with the City's Noise Element, a noise exposure of 60 dBA CNEL or less is considered to be the most desirable target for the exterior of noise-sensitive land uses, or sensitive receptors, such as homes, schools, churches, libraries, etc. With respect to compatibility with the Land Use/Noise Compatibility Guidelines, the ambient noise levels that were recorded at the Project Site ranged between 63.5 to 74.6 dBA Leq. Therefore, the Proposed Project would have the potential to expose future residents of the Project to exterior ambient noise levels that are in the "conditionally acceptable" to "normally unacceptable" CNEL exposure range. Mitigation Measure H-6 is recommended to ensure the Project incorporates wall and floor-ceiling assemblies separating commercial tenant space, residential units, and public places that would have a South Transmission Coefficient (STC) value of at least 50, as determined in accordance with ASTM E90 and ASTM E413 for purposes of achieving an interior noise level of 45 dBA CNEL. With the incorporation of Mitigation Measure H-6, the Proposed Project would result in a less than significant land use/noise compatibility impact. As such, the operation noise of Proposed Project would not conflict with the Noise Element and operational noise impacts would be less than significant with mitigation.

Plan for a Healthy Los Angeles

While many of the goals, objectives, and policies of the Plan for a Healthy Los Angeles are intended to guide the city's approach to various issues that are not directly applicable to the Proposed Project or Project Site, the Project would be supportive of many of the public health goals and objectives that are identified in the Plan for a Healthy Los Angeles. The Proposed Project would promote walkability and reduce vehicle miles traveled by providing ground-floor commercial uses that are oriented towards the public right-of-way and easily accessible on foot. Further, the Proposed Project would include bike racks, street trees and landscaping, which further support pedestrian activity. The Proposed Project is located within a transit priority area, and the Proposed Project would promote the use of alternative transportation, thereby reducing vehicle emissions, which in turn would reduce the per capita concentrations of GHG emissions. The Proposed Project would place residents within easy walking distance of many services, job opportunities, and commercial opportunities. Additionally, the Proposed Project would include 40,675 square feet of landscaped open space on-site and many amenities (including swimming pools, spas, landscaped courtyards, cabana, outdoor seating, clubhouse, fitness center, skydeck, ping pong table, fire pit, barbeque areas, outdoor relaxing areas, outdoor kitchen, and dog wash station). The increased pedestrian oriented activity would also serve to provide more eyes on the street, which would help deter crime. As such, the Proposed Project would support the health of the residents of the Project Site and in the surrounding community by promoting pedestrian activity, open space, and the use of alternative transportation.

Additionally, the Proposed Project would be designed and constructed in consultation with the Los Angeles Department of Transportation, the Los Angeles Department of Building and Safety, the Los Angeles Police Department, and the Los Angeles Fire Department, who would be guided by the citywide goals, policies and objectives identified in the Plan for a Healthy Los Angeles in providing comments on the Proposed Project. The Proposed Project would promote a healthy and safe environment and would not expose residents, commercial tenants, guests, and patrons to unsafe conditions. Thus, to the extent applicable, the Proposed Project would be supportive of the public health goals and objectives identified in the Plan for a Healthy Los Angeles.

Land Use Element (Westlake Community Plan)

The Project Site is located within the Central City West neighborhood sub-area of the Westlake Community Plan Area (CPA). Therefore, all development activity on-site is subject to the land use regulations of the Westlake Community Plan (Community Plan). The Proposed Project would conform to the goals, objectives, and land uses identified in the Community Plan. A consistency analysis of the Proposed Project as it relates to the applicable objectives and policies of the Westlake Community Plan is discussed in Table IV.G-2, Project Consistency Analysis with Applicable Provisions in the Westlake Community Plan, in the Draft EIR.

Central City West Specific Plan

As discussed below, the Proposed Project would comply with the Specific Plan's requirements for zoning, land use categories density, design, open space, and transportation and parking.

Zoning/Land Use Category and Land Use Designation

The Specific Plan determines that the R5(CW), C2(CW), and C4(CW) land use categories shall follow the use and area regulations of the LAMC for the R5 zone, C2 zone, and C4 zone, respectively. R5 allows for the development of one-family dwellings, two-family dwellings, apartment houses, multiple dwellings, and home occupations. C2 allows for the development of C1.5 uses (which include, retail, theaters, hotels, broadcasting studios, parking buildings, parks and playgrounds), retail with limited manufacturing, service stations and garages, churches, schools, auto sales, and R4 uses. C4 allows for the development of C2 uses (described above) with limitations and R4 uses. Where the Specific Plan does not provide provisions on setbacks and yard area, the LAMC provides regulations on setbacks and yard area. Project impacts relating to zoning and land use categories would be less than significant.

The Proposed Project is consistent with the existing zoning and General Plan land use designations, and a less than significant impact would occur in relation to land use designations.

Floor Area Ratio

The Specific Plan allows for the averaging of floor area ratio across the commercial land use categories parcels on the Project Site. The Project Site has an FAR of 6:1 on the R5 parcels, 4.5:1 on the C4 parcels, and 3:1 on the C2 parcels. Pursuant to LAMC Section 11.5.7.E, the Applicant is requesting a Specific Plan Project Permit Adjustment to average or reallocate the permitted density and floor area within the South Building portion of the site. The Proposed Project would have a total allowable FAR of 4.70:1, and the Proposed Project proposes an FAR of 4.51:1. With approval of the discretionary request, the Proposed Project would be consistent with the allowable FAR on-site.

Height

An ALTA Survey for the Proposed Project finds that the Project Site ranges between 360 feet (south) to 378 feet MSL (north). Pursuant to the Specific Plan, and discussed above, the proposed development on the Project Site shall not exceed 1,218 feet above MSL. The Proposed Project includes a North building and a South building that are approximately 98 feet and 2 inches above grade and 91 feet and 11 inches above grade, respectively. Both building include seven levels. The proposed building heights would result in a maximum of approximately 466 feet above MSL, which is well below the established height criteria. As such, the Proposed Project is consistent with the height specifications within the Specific Plan.

Open Space

Pursuant to LAMC Section 12.21.G, the Applicant is requesting a Director's Decision for a 10 percent increase in the qualifying area of interior open space up to a maximum of 35 percent in lieu of 25 percent of the total required open space. With the approval of the entitlement request, the Proposed Project would be compliant with the LAMC and Specific Plan. The Proposed Project would be required to provide 24,600 square feet of open space in the South Building and 16,075 square feet of open space in the North Building for a total of 40,675 square feet of open space. The Proposed Project would include 40,675 square feet of open space thereby achieving the required square feet of open space required. Amenities proposed within the common open space areas may include, but are not limited to, swimming pools, spas, landscaped courtyards, clubhouse, fitness center, skydeck, ping pong table, fire pit, fireplace, outdoor relaxing areas, outdoor barbeque area, outdoor kitchen, and dog wash station. The Proposed Project's landscape palate would feature ornamental plants and drought-tolerant species. The Proposed Project would also provide 369 trees required by the Specific Plan. Thus, the Proposed Project would meet the open space requirements of the Specific Plan and LAMC.

Urban Design Guidelines

The Proposed Project's consistency with the Urban Design Guidelines of the Central City West Specific Plan is discussed in Table IV.G-3 in the Draft EIR.

Parking

The Proposed Project would comply with the parking requirements of the LAMC. With implementation of the Bicycle Parking Ordinance, the Proposed Project would provide a total of 390 parking spaces and 429 bicycle stalls thereby achieving the required number of parking spaces and bicycle stalls defined by the LAMC. The Proposed Project would provide 355 residential parking spaces and 35 retail parking spaces for a total of 390 parking spaces. The Proposed Project would also provide 380 long-term bicycle stalls and 49 short-term bicycle stalls for a total of 429 bicycle parking spaces. The Proposed Project would meet the on-site parking requirements.

Walkability Checklist

In addition to the Central City West Specific Plan Urban Design Requirements and Guidelines discussed above, the Department of City Planning Urban Design Studio has published the Walkability Checklist to guide staff, developers, architects, engineers and all community members in creating enhanced pedestrian movement, access, comfort, and safety–contributing to the walkability of the City The Walkability Checklist provides a list of recommended strategies that projects should employ to improve the pedestrian environment in the public right-of-way and on private property. As provided in Table IV.G-4 in the Draft EIR, Project Consistency Analysis with Applicable Provisions of the City of Los Angeles, Department of City Planning's Walkability Checklist, the Proposed Project is substantially consistent with the applicable objectives, goals and strategies of the City's Walkability Checklist.

SCAQMD Air Management Plan

The proposed Project is substantially consistent with the applicable goals and policies of the AQMP, SCAG's Regional Comprehensive Plan and the 2016-2040 Regional Transportation Plan

/ Sustainable Communities Strategy (RTP/SCS). The Proposed Project is located within the South Coast Air Basin (Basin) and, therefore, falls under the jurisdiction of the SCAQMD. In conjunction with SCAG, the SCAQMD is responsible for formulating and implementing air pollution control strategies. The SCAQMD's Air Quality Management Plan (AQMP) was updated in 2003 to establish a comprehensive air pollution control program leading to the attainment of State and federal air quality standards in the Basin, which is a non-attainment area. As discussed in IV.B, Air Quality, the Proposed Project would not exceed the daily emission thresholds during the construction or operational phases of the Proposed Project. Therefore, the Proposed Project would be consistent with the AQMP.

SCAG Regional Comprehensive Plan

The Project Site is located within the six-county region that comprises the SCAG planning area. The SCAG Regional Comprehensive Plan (RCP) includes growth management policies that strive to improve the standard of living, maintain the regional quality of life, and provide social, political, and cultural equity. The Proposed Project would be consistent with policies set forth in the RCP, as the Proposed Project would redevelop an existing parking lot and underutilized commercial property with a high density multi-family residential development with project-serving retail uses, thereby maximizing a property that is easily accessible to mass transit, and that is least likely to cause an adverse environmental impact. Furthermore, as the Proposed Project would add approximately 369 residential units to the downtown area, generating as many as 1,148 residents, which is consistent with SCAG growth projections.

SCAG Regional Transportation Plan / Sustainable Communities Strategy

On April 2016, SCAG's Regional Council adopted the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS): A Plan for Mobility, Accessibility, Sustainability, and a High Quality of Life. On a policy level, the Proposed Project is consistent with the goals and strategies of the RTP/SCS, as the Proposed Project will revitalize an underutilized, fully developed property in an existing commercial and residential area. The Proposed Project is an infill development project within the Westlake Community Plan Area within the City of Los Angeles.

With respect to regional growth forecasts, SCAG forecasts that the City of Los Angeles Subregion will experience a population increase to 4.6 million persons by 2040. SCAG Population and Housing Projections for the City of Los Angeles and the SCAG Region the forecast from 2012 through 2040 envisions a population growth of 763,900 additional persons (an approximate 20% growth rate) and 3,816,000 additional persons (an approximate 21% growth rate), respectively. The number of households within the City is Los Angeles is anticipated to increase by 364,800 households, or approximately 28% between 2012 and 2040. The number of households within the SCAG Region is anticipated to increase by 1,527,000 households, or approximately 26% between 2012 and 2040. By 2040, the City of Los Angeles is expected to experience a 20% population growth, 28% household unit growth, and a 28% employment growth as compared to the 2012 values.

The Proposed Project would construct 369 multi-family residential units that would result in approximately 1,148 net permanent residents in the City of Los Angeles. The proposed increase in housing units and population would be consistent with the RTP/SCS, and a less than significant impact would occur.

Land Use Compatibility (Surrounding Properties)

The proposed Project would result in the loss and displacement of 111,272 gross square feet of general office and medical office land uses and the introduction of 369 dwelling units. The loss and displacement of commercial land uses with a conversion to residential land uses would not by itself generate a significant land use impact. Based on the exiting land uses in the immediate project vicinity, the introduction of residential land uses would not result in any adverse environmental impacts or land use compatibility impacts relative to the use and enjoyment of the existing land uses. The density and type of land uses proposed are consistent with the underlying zoning code and applicable provisions of the City's General Plan, Community Plan and Specific Plan. The properties surrounding the Project Site include commercial retail, office, multi-family residential buildings, schools, the Good Samaritan Hospital, and an active construction site for the approved Bixel and Lucas Project. As such, land use compatibility impacts would be less than significant with respect to adjacent land uses.

Land Use Compatibility (Freeway Emissions)

Redevelopment of the site and the conversion of general office and medical office space to residential land uses would result in a potentially significant land uses compatibility impact with respect to placing residential land uses in close proximity to the Harbor (I-110) Freeway, which is known to generate poor ambient air quality levels within 1,000 feet of the freeway. Compliance with Section 99.04.504.6 of the LAMC, which requires the installation of MERV 13 filtration systems in mechanically ventilated buildings within 1,000 feet of the freeway would reduce this impact to a less than significant level.

The Proposed Project is subject to the City's Project Freeway Adjacent Advisory Notice for Sensitive Uses (ZI No. 2427), which is an advisory notice and serves as an early notification to applicants of discretionary projects who may not otherwise be aware of the potential impacts on future buildings occupants of siting a building near a freeway. The three parcels that front Bixel Street and the first 120 feet of the Project Site from the corner of Bixel Street and W. 6th Street are approximately 1,000 feet of the Harbor Freeway (I-110), which is located to the east of the Project Site. The future residents within this section of the proposed development may be exposed to poor air quality emissions from vehicles traveling on these roadways. While recent court rulings have found that CEQA does not require an analysis of the impacts of the environment on a project, the AQMD and the City Planning Commission continue to recommend that, prior to the approval of a project, the impacts of air pollutants on people who would live in a new project are addressed and appropriately mitigated to the extent feasible. Increasing the distance from the receptor to the source is the most effective means of reducing a sensitive receptor's exposure to harmful air emissions. The actual effectiveness of providing a buffer zone varies with distance, local topography, and climatological factors, but some studies suggest up to 100 percent effectiveness can reduce exposure to background ambient air quality levels at a distance of 500 feet. Providing enhanced filtration in building Heating, Ventilation, and Air Conditioning (HVAC) systems is an effective mitigation measure as it pertains to improving indoor air quality. As noted in ZI No. 2427, the Department of City Planning recommends the installation of filters meeting or exceeding the ASHRAE Standard 52.2 Minimum Efficiency Reporting Value (MERV) of 11 for projects within 1,000 feet of freeways. Additionally, Section 99.04.504.6 of the LAMC requires mechanically ventilated buildings within 1,000 feet of the freeway to provide regularly occupied areas of the building with air filtration media for outside and return are that provides a Minimum Efficiency Reporting Value of 13. Only the portion of dwelling units located on the three parcels that front Bixel Street and approximately the first 120 feet of the Project Site from the corner of Bixel Street and W. 6th Street are located within 1,000 feet of the freeway and are subject to the MERV standards set for in ZI 2427 and Section 99.04.504.6 of the LAMC. As such, with

adherence to the LAMC, impacts associated with the future occupant's exposure to ambient air quality would be less than significant.

b. Cumulative Impacts

Cumulative land use impacts could occur if other related projects in the vicinity of the Project Site would result in land use incompatibility effects in conjunction with the impacts of the Proposed Project. The Proposed Project would implement important local and regional goals and policies for the Westlake area and Central City West area, which would assist the City of Los Angeles in achieving short- and long-term planning goals and objectives. Furthermore, all related projects would be subject to the same development standards as the Proposed Project with respect to assessing the consistency of each project relative to the Westlake Community Plan, the LAMC, the Central City West Specific Plan, and the other applicable specific and or regional land use plans. Related projects outside of the Westlake Community Plan and Central City West Specific Plan would be required to follow the development standards of the respective Community Plan and/or Specific Plans that govern their respective geographic area. Therefore, no significant cumulative land use impacts are anticipated.

c. Project Design Features

No Project Design Features were identified with respect to land use and planning.

5. Population Housing and Employment

a. Project Impacts

The Project Site includes the development of up to approximately 348,430.5 square feet of floor area consisting of approximately 369 multiple residential dwelling units and 22,000 square feet of ground-floor retail.

The Proposed Project's 369 dwelling units would generate approximately 1,148 new residents. The estimated population projections were based on an average household size of 3.11 persons per multi-family dwelling unit, which is consistent with the most recent statistical information provided by the Department of City Planning for the Westlake Community Plan Area.

Housing Growth

There are no existing residences or residential uses on the Project Site. The Proposed Project would include the construction of up to 369 new multi-family dwelling units, directly increasing population growth within the region. The City of Los Angeles provides population estimates per year for each CPA, with the most current population estimate being from 2009. The Westlake CPA has a resident population per unit factor of 3.11 for multi-family units. As such, the Proposed Project's 369 multi-family units is estimated to introduce up to 1,148 new permanent residents to the Project Site.

The 2010 Census shows an actual housing stock of 40,643 housing units within the Westlake community, which is 1,783 units above the Framework 2010 housing projection and 824 units above the Community Plan's estimated 2010 capacity for the CPA. Westlake community is currently operating above the projected and estimated housing capacity for the CPA. Nevertheless, SCAG's 2016-2040 RTP/SCS Growth Forecast forecasts 1,690,300 housing units

within the City of Los Angeles in the year 2040. As such, the Proposed Project would be consistent with SCAG's housing projections for the City of Los Angeles.

The Project's 369 dwelling units that would represent approximately 0.1 percent of SCAG's citywide housing growth projections during the 2012 to 2040 timeframe. The Proposed Project would not exceed the housing growth estimates for 2040. The Project would help address the City's goal of increasing housing units within the City in an area that has the infrastructure to accommodate such growth and diversifying the housing stock. As such, the Project would result in a less than significant impact to housing.

Population Growth

Construction

The Proposed Project is also anticipated to generate a number of skilled construction-related jobs during the buildout of the Proposed Project. The work requirements of many construction projects are highly specialized so that construction workers remain at a job site only for the time frame in which their specific skills are needed to complete a particular phase of the construction process. As a result, construction workers typically work at several job sites within a particular region throughout the year. Therefore, most construction workers would not be expected to relocate their place of residence as a consequence of working on the Proposed Project. As such, a substantial number of new permanent residents would not be generated as a result of the construction of the Proposed Project and impacts associated with population growth due to temporary construction jobs would be less than significant.

Operation

The Project is anticipated to generate approximately 369 multi-family housing units and 1,148 new residents within the Westlake planning area. The addition of 1,148 residents is within the City of Los Angeles' General Plan Framework population projection and Westlake Community Plan's population capacity. The Project's population growth represents approximately 0.2 percent of the total population growth anticipated to occur within the City of Los Angeles between 2012 and 2040. On a regional scale, the Project represents only 0.03 percent of the growth that is expected to occur in the SCAG region between 2012 and 2040. The 1,148 new residents anticipated to be generated by the Proposed Project would result in a negligible increase in the City's population growth forecast, and is within SCAG's population growth projections for the City of Los Angeles and SCAG region. Additionally, the population growth generated by the Proposed Project would also be well within the Framework Element and the Westlake Community Plan population projections of 121,987 persons and 134,016 persons, respectively. Therefore, the Proposed Project's population growth is accounted for in the citywide and regional population projections. The Project would result in a less than significant impact to population increase during its operation.

Employment

The Proposed Project is estimated to generate a total of approximately 66 new employees at the Project Site resulting in a decrease in net permanent jobs as compared to existing on-site activities. Jobs in the retail, restaurant, and coffee shop industries typically do not generate substantial population growth within the region as such jobs are generally filled by residents that already reside within proximity to those jobs. Further, the Proposed Project's residential component would be supportive and complementary to the proposed commercial and retail land

uses. As such, the Proposed Project would not generate substantial indirect population growth or demand for new housing, and a less than significant impact would occur.

Jobs Housing Balance

The Proposed Project would achieve a healthy jobs-housing balance that is consistent with the growth strategies of SCAG's 2016-2040 RTP/SCS. The 2016-2040 RTP/SCS focuses the majority of new housing and job growth in high-quality transit areas and other opportunity areas in existing main streets, downtowns, and commercial corridors, resulting in an improved jobs-housing balance and more opportunity for transit-oriented development. This overall land use development pattern supports and complements the proposed transportation network that emphasizes system preservation, active transportation, and transportation demand management measures. The Proposed Project is consistent with this regional strategy, as it falls within a Transit Priority Area defined by SB 734. The Project Site is well supported by existing infrastructure, and would place new residents in close proximity to a major employment center. Furthermore, the mixed-use nature of the Project promotes a healthy jobs-housing balance as the Proposed Project is estimated to produce approximately 369 new housing units (generating 1,148 residents) and approximately 66 jobs, resulting in a jobs-to-housing ratio of approximately 1 job to every 5 dwelling units (1:5 ratio). Thus, the mixed-use nature of the Proposed Project would promote the jobs-house balance and a less than significant impact would occur.

b. Cumulative Impacts

The 99 related projects identified in Section III, Related Projects (see Table III-2) would introduce additional residential, commercial/retail/restaurant, schools, parking, and entertainment uses to the City of Los Angeles. The residential uses proposed would generate an increase in housing as well as population in the City of Los Angeles. The related projects' locations are proposed in different Community Plan Areas in close proximity to the Project Site. The total proposed housing units in each CPA were added together based on the location of each related project. The City of Los Angeles Demographic Research Unit provides population and housing growth estimates for each CPA within the City. Each CPA is characterized by different resident population to dwelling unit generation rates. For the purposes of evaluating cumulative population and housing impacts, the population generated in each CPA were calculated based on the resident to dwelling unit ratio provided by the City for the 2009 Population Estimate. This cumulative number is then compared to the maximum population and housing projected in the City of Los Angeles in the 2016-2040 RTP/SCS Growth Forecast.

The Proposed Project and related projects would generate approximately 24,934 housing units, and a resident population of approximately 45,740 persons. Based on this estimate, the Proposed Project's cumulative contribution to the housing and population growth would be approximately 1.5% for housing projections and 2.5% for population projections. As the proposed cumulative total of new housing and population would not exceed SCAG's regional growth projections, the Proposed Project's contribution to a cumulative housing and population impact would be less than significant.

c. Project Design Features

No Project Design Features were identified with respect to population housing and employment impacts.

6. Public Utilities

A. Water

a. Project Impacts

Construction

Construction of the Proposed Project would result in a less than significant impact with respect to water resources and/or water conveyance infrastructure.

The Project area is currently served by adequate potable water infrastructure. Construction of the Proposed Project would require the contractor to connect to the existing potable water infrastructure in the Project's service area to serve the Project's operational demands. The Project's water demands (i.e., quantity, size and type of infrastructure) would be determined by the Applicant's engineering consultants in consultation with the Los Angeles Department of Building and Safety based on applicable building code requirements. The on-site (sprinkler system and private fire hydrants) and off-site (public fire hydrants) fire flow demands are determined based on the Los Angeles City Fire Department and applicable building code requirements. Specific fire-flow tests are typically conducted during the civil engineering review phase of the Project, after Project approval. Once a determination of the Project's domestic and fire demands has been made, LADWP will assess the need for additional facilities. If the estimated water requirements for the Proposed Project can be served by existing water mains in the adjacent streets, water service would be provided routinely in accordance with the LADWP's rules and regulations. If the estimated water requirements are greater than the available capacity of the existing distribution facilities, arrangements must be made with LADWP to enlarge the flow capacity or pressure in supply line(s). In this case, upgrades to the supply main may cause temporary impacts on the adjacent land uses during construction. Although new service connections have the potential to result in short term and temporary interruptions in water services for existing customers, new water service installations are generally connected so as to avoid water service interruption. Advisory notices are also distributed to the affected area to inform affected LADWP water customers of any planned disruptions in service. Therefore, if any disruptions in local water service occur during the construction period, any disruptions would be temporary and short in duration. As such, impacts would be less than significant.

Operation

Operation of the Proposed Project would result in a net increase of 30,666 gpd (approximately 34 AFY) of potable water. The Project's net incremental demand on regional water supplies is consistent with the water demand projections contained in the Urban Water Management Plan and would result in a less than significant impact.

Operation of the Proposed Project would increase water demands within the LADWP service area. The Project's water demands are determined based on projections established from the approved City of Los Angeles Bureau of Sanitation generation rates and on whether the projected water demand of the Proposed Project would be within the 25-year water demand growth projected in the City of Los Angeles' Year 2015 Urban Water Management Plan.

Currently the Project Site generates a water demand of approximately 23,915 gpd based on the existing active land uses. The Proposed Project would replace all buildings and structures on-site

with a new mixed-use project comprised of 369 multi-family residential units and 22,000 square feet of commercial/retail space. In accordance with the LA CEQA Thresholds Guide, the base estimated water demand was based on 120 percent of the sewerage generation factors for residential and commercial categories (Bureau of Sanitation, 1996). The estimated water demand for the Proposed Project is 54,581 gpd (61 AFY). With the elimination of the existing land uses, the Project's net increase in water demand is 30,666 gpd or approximately 34 AFY.

Development of the Proposed Project is not expected to measurably affect the LAAFP's capacity to continue to serve the Project Site and surrounding areas; therefore, no new or expanded water treatment facilities would be required. The Department of Water and Power's water supplies available during normal, single-dry, and multiple-dry water years, as included in the 25-year projection contained in its 2015 UWMP, would meet the projected water demand associated with the Proposed Project, in addition to the existing and other planned future uses of LADWP system. Because the water demands of the Proposed Project are within the 25-year water demand growth projected in the UWMP and water supplies are considered to be reliable. As such, impacts associated with regional water supplies would be less than significant.

Although water supplies are currently available and adequate to serve the needs of the Project, several factors affect the long-term availability of projected water supplies for the City of Los Angeles as a whole. As such, the City of Los Angeles imposes water regulatory compliance measures for all projects within its jurisdiction. The City's Water Efficiency Requirements Ordinance No. 180,822, effective December 2009; 2013 California Plumbing Code, effective January 1, 2014; 2013 California Green Building Code (CALGreen), effective January 1, 2014; 2014 Los Angeles Plumbing Code, effective January 1, 2014; and Ordinance No. 184,248, effective June 6, 2016, require the use of numerous conservation measures which would further reduce the Project's long-term operational water demand.

Pursuant to LAMC Section 122.03(a), the Proposed Project is required to utilize water saving devices including, but not limited to, urinals equipped with flush-o-meter valves (for retail only), which flush with a maximum of 1.28 gallons, which would reduce the Project's demand upon potable water supplies, especially for the proposed residential uses. Environmental impacts would further be reduced by implementation of 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). Additional conservation measures would be incorporated in the landscape plan and water conservation measures, pursuant to the Water Management Ordinance. Additionally, Ordinance No. 184,248 requires a 20% reduction in the overall use of potable water within any new buildings shall be provided.

The 2015 Urban Water Management Plan projects the City of Los Angeles would have a water supply of approximately 611,800 AFY and 675,700 AFY in 2020 and 2040, respectively. Demographic data from the Southern California Association of Government's (SCAG's) 2012 Regional Transportation Plan (RTP) as well as billing data for each major customer class, weather, conservation, price of water, personal income, family size, economy, and drought conservation effect were factors used in forecasting future water demand growth. Thus, projects that are consistent with the underlying zoning and allowable density requirements of the LAMC and General Plan, and the associated growth projections of the 2012-2035 RTP/SCS, are inherently consistent with the future water demands established in the 2015 UWMP. The Proposed Project is consistent with the underlying zoning and density limitations for the Project

Site and would not exceed the anticipated growth rate of the Community Plan area. Therefore, with implementation of the regulatory compliance measures identified above, the Proposed Project's impact upon water demands within the LADWP service area would be less than significant.

b. Cumulative Impacts

In accordance with Section 15130(b)(1)(A)(B) of the CEQA Guidelines, an adequate discussion of a project's significant cumulative impact, in combination with other related projects, can be based on either: (1) a list of past, present, and probable future producing related impacts; or (2) a summary of projections contained in an adopted local, regional, or statewide plan or related planning document that describes conditions contributing to the cumulative effect. The lead agency may also blend the "list" and "plan" approaches to analyze the severity of impacts and their likelihood of occurrence. For purposes of assessing the Proposed Project's cumulative impact with respect to impacts upon water supply and infrastructure, the analysis below is appropriately based on a combination of the plan-based approach and the list-based approach to determine the Proposed Project's contributing effect on potential cumulative impacts on water resources.

Similar to the Proposed Project, the related projects are within the City of Los Angeles. The related projects would be served by existing potable water conveyance infrastructure, similar to the Proposed Project. Construction of the related projects would require the contractor to connect to the existing potable water infrastructure in the related project's service area to serve its operational demands. Each related project's water demands (i.e., quantity, size and type of infrastructure) would be determined by the each related project applicant's engineering consultants in consultation with the Los Angeles Department of Building and Safety based on applicable building code requirements. The on-site (sprinkler system and private fire hydrants) and off-site (public fire hydrants) fire flow demands for each related project would be determined based on the Los Angeles City Fire Department and applicable building code requirements. Specific fire-flow tests are typically conducted during the civil engineering review phase of each related project. Once a determination of each related project's domestic and fire demands has been made, LADWP will assess the need for additional facilities. If the estimated water requirements for each related project were greater than the available capacity of the existing distribution facilities, each related project would coordinate with LADWP to enlarge the flow capacity or pressure in supply line(s). As such, needed improvements to water conveyance infrastructure would be determined on a case-by-case basis. As discussed above, the Proposed Project would result in a less than significant impact to water infrastructure, and its impacts would not be cumulatively considerable.

Cumulative water demand impacts are assessed based on the water demand projections set forth in the City of Los Angeles' 2015 Urban Water Management Plan. Because water demands are driven by demographics (population, housing and employment), implementation of water conservation programs, behavioral practices of water users, and weather, this cumulative analysis focuses on the Project's consistency with the broader growth projections of the 2015 UWMP instead of the approximate 2-mile sphere of influence of the related projects list identified in Section III, Environmental Setting of the Draft EIR. The LADWP's service area includes the entire city and areas outside the City's boundary, including portions of West Hollywood, Culver City, Universal City, and small parts of the County of Los Angeles. For these reasons the plan-based approach was utilized instead of relying on the related project's list.

As reported in the 2015 UWMP, the population within LADWP's service area increased from 2.97 million in 1980 to approximately 3.99 million in 2015, representing an average annual growth rate of approximately 1.0 percent. The total number of housing units increased from 1.10 million in 1980 to approximately 1.39 million in 2015, representing an average annual growth rate of approximately 0.8 percent.

Implementation of the Proposed Project in conjunction with cumulative development within the City of Los Angeles would further increase cumulative demands for water supplies in the LADWP service area. The net water demand of the Proposed Project and related projects totals approximately 7,516,721 gpd or 8,425 AFY, which 1.7 percent of the 2015 UWMP forecasted water demand for 2020. In terms of the City's overall water supply condition, the water demands for projects that are consistent with the regional growth projections contained in the City's General Plan have been taken into account in the planned growth of the Water System. For projects that meet the requirements established in Sections 10910-10915 of the State Water Code, a Water Supply Assessment report demonstrating sufficient water availability would be required on a project-by-project basis. Because the LADWP has determined that the Proposed Project's anticipated water demands are within the growth projections of the 2015 UWMP, the Proposed Project's cumulative contribution to impacts upon the City's water resources would be less than significant.

c. Project Design Features

No Project Design Features were identified with respect to water impacts.

B. Wastewater

a. Project Impacts

The Project Site is adequately served by existing wastewater infrastructure. The Proposed Project would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, and impacts upon wastewater facilities would be less than significant.

The Proposed Project would result in a less than significant impact upon regional wastewater treatment capacity and local conveyance infrastructure. The Proposed Project is anticipated to generate approximately 25,555 gallons per day (gpd) of wastewater, or 9.3 million gallons per year. Wastewater generated by the Proposed Project would be conveyed and treated at the HWRP, which has adequate capacity to accommodate the increased wastewater flows. Thus, RWQCB treatment standards area would be maintained and impacts would be less than significant.

The Project area is presently served by a network of sewer lines that are located beneath most of the major streets that convey sewage from the Project Site to the HWRP. As part of the pre-construction process, detailed gauging and evaluation would be needed as part of the permit process to identify a specific sewer connection point for the Project Site. Through the rules and regulations established in the City of Los Angeles Sewer Allocation Ordinance (No. 166,060), the Bureau of Sanitation does not make a determination of sewer capacity until LADBS has established that the Proposed Project's plans and specifications are acceptable for plan check. This process ensures that the system can accept the anticipated wastewater flows from the Proposed Project at the time of connection, as opposed to prematurely committing to projects that are in the environmental review or entitlement process. At the time of connection, the Bureau of Sanitation will check the gauging of the sewer lines and make the appropriate decisions on how

best to connect to the local sewer lines at the time of construction. The Applicant would be required to submit a Sewer Capacity Availability Request (SCAR) to verify the anticipated sewer flows and points of connection and to assess the condition and capacity of the sewer lines receiving additional sewer flows from the Proposed Project.

As determined in the correspondence with the Bureau of Sanitation, based on the estimated flows, the existing sewer system may be able to accommodate the total flow estimated for the Proposed Project. Further detailed gauging and evaluation would be needed as part of the permit process to identify a specific sewer connection point. If the public sewer has insufficient capacity to accommodate the Proposed Project's wastewater flows, the Applicant would be required to build sewer line to a point in the sewer system wither sufficient capacity. A final approval for sewer capacity and connect permit would be made at the time. The installation of a secondary line, if needed, would require minimal trenching and pipeline installation and would not result in any adverse environmental impacts. Ultimately, the sewage flow would be conveyed to the Hyperion Water Reclamation Plant, which has sufficient capacity for the Proposed Project.

The Hyperion Water Reclamation Plant (HWRP) provides full secondary treatment for all influent based on an average dry weather flow of 450 mgd. Thus, the projected increase of 25,555 gpd would represent a fraction of one percent (approximately 0.001 percent) of the excess treatment capacity presently available at the HWRP (175 mgd). Additionally, water conservation measures required by City ordinance (e.g., installation of low flow toilets and plumbing fixtures that prevent water loss, etc.) would be implemented as part of the Proposed Project and would help reduce the amount of wastewater generated by the Proposed Project. Therefore, Proposed Project impacts with respect to the existing wastewater infrastructure would be less than significant.

b. Cumulative Impacts

In accordance with Section 15130(b)(1)(A)(B) of the CEQA Guidelines, an adequate discussion of a project's significant cumulative impact, in combination with other related projects, can be based on either: (1) a list of past, present, and probable future producing related impacts; or (2) a summary of projections contained in an adopted local, regional, or statewide plan or related planning document that describes conditions contributing to the cumulative effect. The lead agency may also blend the "list" and "plan" approaches to analyze the severity of impacts and their likelihood of occurrence. For purposes of assessing the Project's cumulative impact with respect to impacts upon wastewater treatment and infrastructure, the analysis below is appropriately based on a combination of the plan-based approach and the list-based approach to determine the Project's contributing effect on potential cumulative impacts on wastewater generation.

Implementation of the Proposed Project in conjunction with the related projects identified in Section III (Environmental Setting) of the Draft EIR would further increase demands of sewer service. The total sewage generation by the related projects and the Proposed Project would be approximately 6,263,935 gpd, or about 6.3 mgd.

Sewage generated by the Proposed Project would contribute approximately 0.4 percent of the total cumulative sewage generation created by the related projects. Furthermore, the cumulative sewage generation for the Proposed Project plus the related projects would represent approximately 3.6 percent of HWRP's excess treatment capacity presently available, which is 175 mgd. This increase would be well within the remaining treatment capacity currently available and projected to be available at HWRP. Therefore, the Proposed Project in combination with the related projects would not require the construction of new wastewater treatment facilities or the

expansion of existing wastewater treatment facilities. Similar to the Proposed Project, each related project would be evaluated on a case-by-case basis to determine if the public sewer serving each related project has sufficient capacity to accommodate the project's wastewater flows. If the public sewer has insufficient capacity to accommodate a related project's wastewater flows, the related project would be required to build sewer line to a point in the sewer system wither sufficient capacity. Each related project would be required to consult with the Bureau of Sanitation and comply with all applicable city and state water conservation programs and sewer allocation ordinances. Therefore, cumulative impacts on wastewater services would be less than significant.

c. Project Design Features

No Project Design Features were identified with respect to wastewater impacts.

C. Energy Conservation

Construction of the Proposed Project would result in a less than significant impact upon energy resources.

a. Construction

Energy demands during the construction of the Proposed Project would result in a less than significant impact upon energy resources and infrastructure.

Energy would be consumed during the demolition, excavation, and construction phases of the Proposed Project for grading and materials transfer by heavy-duty equipment, which is usually diesel powered. It is expected that the heavy equipment involved in the demolition, excavation, and construction phases of the Proposed Project would include crawler-excavators, loaders, bulldozers, graders, water trucks, street sweepers, tractors, cranes, and fork lifts. In addition, dump trucks would be used to haul excavated earth and building material to the Sunshine Canyon Landfill, Chiquita Canyon Landfill, and Waste Management Downtown Diversion Center throughout the demolition, grading, and excavation phases. It is assumed that the majority of hauling would occur during the demolition and excavation phases, which are expected to occur during the first portion of the construction period.

Construction of the Project's electrical infrastructure would primarily occur within the Project Site although some off-site construction activities to connect the Project's electrical infrastructure with primary electrical distribution lines could occur. The Applicant would be required to coordinate electrical infrastructure removals or relocations with LADWP and comply with site-specific requirements set forth by LADWP, which would ensure that service disruptions and potential impacts associated with grading, construction, and development within LADWP easements are minimized. As such, construction of the Project's electrical infrastructure is not anticipated to adversely affect the electrical infrastructure serving the surrounding uses or utility system capacity.

Construction of the Proposed Project would require the export of soil, asphalt, and debris from the Project Site. The demolition/excavation phase of the Proposed Project would generate additional haul trips and diesel fuel would be consumed by heavy equipment during the excavation, grading, and construction process. Construction worker travel to and from the Project Site would result in the additional consumption of vehicular unleaded gasoline fuel during the construction period. In addition to diesel fuel and vehicular fuel, an unquantifiable amount of

electricity and natural gas would be consumed as a result of the temporary construction process. Furthermore, the electricity demand during construction would be somewhat offset with the removal of the existing on-site uses which currently generate a demand for electricity. Due to the relatively short duration of the construction process, and the fact that the extent of fuel consumption is inherent to construction projects of this size and nature, fuel consumption impacts would not be considered excessive or substantial with respect to regional fuel supplies. The energy demands during construction would be typical of construction projects for projects of this size and would not necessitate additional energy facilities or distribution infrastructure. Accordingly, energy demands during construction would be less than significant.

Construction activities, including the construction of new buildings, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support Project construction activities; thus there would be no demand generated by construction. However, the Project would involve installation of new or relocated natural gas connections to serve the Project Site. Since the Project Site is located in an area already served by existing natural gas infrastructure, it is anticipated that the Project would not require extensive off-site infrastructure improvements to serve the Project Site. Construction impacts associated with the installation of natural gas connections are expected to be confined to trenching in order to place the lines below surface. In addition, prior to ground disturbance, Project contractors would notify and coordinate with SoCalGas to identify the locations and depth of all existing gas lines and avoid disruption of gas service to other properties. Therefore, construction of the Project would not result in an increase in demand for natural gas to affect available supply or distribution infrastructure capabilities and would not result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Construction-related impacts to natural gas supply and infrastructure would be less than significant.

Petroleum Based Fuel Demand

Demolition, site clearing, grading, excavation, and trenching activities would include the use of heavy equipment and vehicles consuming diesel fuel. Diesel and gasoline fuel would be consumed by construction worker vehicles travelling to and from the Project Site. The use of haul trucks with double trailers would be used to increase the overall average capacity per trip, which would minimize the total number of trips and fuel required to transport the debris. Heavyduty construction equipment needed during construction of the Project would include concrete pumps, forklifts, lifts, welders, backhoes, dozers, forklifts, lifts, loaders, and rollers, the majority of which would be diesel fueled. Diesel fuel for construction equipment and haul trucks would be provided by local or regional suppliers and vendors. As discussed in further detail in Section VI, Energy Conservation, approximately 142,194 gallons of diesel fuel are anticipated to be consumed by the Project's construction activities.

Construction of the Project would not result in the inefficient consumption of energy resources. Compliance with the existing anti-idling and emissions regulations would result in efficient use of construction- related energy and would minimize or reduce wasteful and unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption, as would use of haul trucks with larger capacities, as previously stated. Therefore, impacts associated with the potential inefficient use of petroleum-based fuel during construction would be less than significant.

Operation

Operation of the Proposed Project would result in a less than significant impact upon energy resources.

Electricity Use

Development of the Proposed Project would increase the existing demand for electricity service in the Project Area. The Proposed Project would be able to hook up to and be served by the existing power grid. The estimated net increase in electricity consumption by the Proposed Project would be approximately 1,826,847 kilowatts per year.

The projected increase in electrical demand due to the Proposed Project would not have an adverse impact on its electrical system. Depending on the exact location and size of the requested services (to be determined as site plans are finalized), the Proposed Project would require an on-site transformation facility. The Project Applicant may be financially responsible for some infrastructure improvements (e.g. installation of electric power facilities or service connections) necessary to serve the Proposed Project.

New service connections may occasionally result in temporary disruptions in electrical services for existing customers. However, no outages or short outage is anticipated to occur when hooking up the Proposed Project. Energy supplies are adequate to serve the Project and the installation of needed new infrastructure would not be expected to result in any significant secondary environmental effects as all activities involving the Project's service connections to electricity infrastructure would be conducted in consultation with and under the oversight of the LADWP through standard regulatory processes. Therefore, impacts to electrical services would be less than significant.

Further, the Proposed Project would support the City's goal of improving energy conservation and efficiency outlined in City's Green LA, An Action Plan to Lead the Nation in Fighting Global Warming (L.A. Green Plan). Twenty percent of the Proposed Project's code-required parking would be supported by electric vehicle supply equipment (EVSE). See Section 3, Greenhouse Gas Emissions, PDF E-1, above. The Proposed Project would also comply with Title 24 and the Los Angeles Green Building Code, and implement water efficient fixtures and comply with Title 24 and the Los Angeles Green Building Code's applicable standards on energy use. Additionally, the Project Site's location in a transit priority area and close proximity to multiple alternative transportation options, including the 7th and Metro Center Station and multiple bus stops, would further support the City's goal of promoting energy conservation and energy efficiency.

With modern energy-efficient construction materials and operating equipment, the Proposed Project would promote conservation in accordance with the policies identified in Title 24 and in the City of Los Angeles General Plan Framework. While impacts upon regional energy resources are expected to be less than significant, the LA Green Building Code imposes energy conservation measures for all new projects to further reduce energy demands within new buildings. Implementation of regulatory compliance measures under the LA Green Building Code would meet or exceed Title 24 energy efficiency requirements and further reduce demand for electricity.

Natural Gas Use

The Proposed Project would increase demand for natural gas service on the Project Site. The Proposed Project's net natural gas demands are estimated to be approximately 1,350,908 cubic feet (cf) per month, or approximately 16,210,896 cf/year. As further discussed under cumulative

impacts, below, as concluded in the 2016 California Gas Report, SCG has stable gas storage and projected supplies to meet regional market demands through 2035 growth forecasts.

The Southern California Gas Company manages the pipelines adjacent to the Project Site. If problems/deficiencies were to exist, appropriate actions (e.g. pressure betterments, natural gas supplies) would need to be initiated to solve problems. Based on SCG's existing facilities serving the Project Site and the surrounding area, it is anticipated that SCG would be able to meet the natural gas demands of the Proposed Project with minimal improvements to the local natural gas infrastructure. However, a detailed natural gas survey of equipment would have to be completed at the time of construction before knowing if the current infrastructure would sustain the demand for the Proposed Project. Further, since natural gas supplies vary with time, the Southern California Gas Company's ability to accommodate Proposed Project's demand for natural gas supplies can only be evaluated when the Project is approved.

Since the Proposed Project is located in an area already served by existing natural gas infrastructure, the Proposed Project would not require extensive infrastructure improvement to serve the Project Site. It is not anticipated that any new natural gas distribution pipelines or infrastructure facilities would be constructed or expanded as a result of the Proposed Project. The Proposed Project would however, require local infrastructure improvements to connect to the existing infrastructure serving the Project area. "Hooking-up" disruptions cannot be determined until the actual natural gas demand is known. However, impacts associated with utility upgrades or additional connections would be temporary in nature and thus result in less than significant impacts upon the environment. Therefore, impacts associated with natural gas consumption would be less than significant.

Petroleum Based Fuels

Operation of the Proposed Project would result in the consumption of fuel related to vehicular travel to and from the Project Site. The estimation of the Proposed Project's fuel consumption is primarily based on vehicle miles traveled (VMTs). While the Proposed Project is estimated to generate 587 net additional daily trips as compared to existing conditions, the Proposed Project includes features that would reduce VMTs, primarily through the mixed-use nature of the proposed land uses and the Project Site's close proximity to public transit opportunities. Operation of the Proposed Project is estimated to generate a demand for approximately 172,771 gallons of petroleum-based fuels per year. The petroleum based fuel demands of the Proposed Project would be approximately 5,479 gallons less than current demands based on the existing uses. Furthermore, to further encourage carpooling and the use of electric vehicles by Project residents and visitors, at least twenty (20)% of the total code-required parking spaces provided will be supported by electric vehicle supply equipment (EVSE) (See PDF E-1 in Section IV.E, Greenhouse Gas Emissions). The provision of EV charging locations on-site would further promote the use of EVs in the region, which would further reduce gasoline and diesel consumption associated with the use of vehicles. Therefore, impacts associated with the potential inefficient use of petroleum-based fuel during operation of the Project would be less than significant.

b. Cumulative Impacts

Electricity

Development of the Proposed Project in conjunction with the 99 related projects would further increase demand for electricity service provided by LADWP. The total electricity consumption by the Proposed Project and related projects would be approximately 285,064,254 kilowatts per year.

The LADWP's 2015 Power Integrated Resource Plan (IRP) document serves as a comprehensive 20-year plan to supply reliable electricity to the City of Los Angeles in an environmentally responsible and cost effective manner. The 2015 IRP considers a 20-year planning horizon to guide LADWP as it executes major new and replacement projects and programs. The 2015 IRP outlines an aggressive strategy for LADWP to accomplish its goals and provide sufficient resources over the next 20 years given the information presently available, including the following major strategic initiatives: (1) Eliminate Coal from LADWP's Power Supply, (2) Reach 33 percent renewable portfolio standard by 2020 and 50 percent by 2030, including a goal of 800 MW Local Solar, (3) Achieve 15 percent energy efficiency by 2020, (4) Eliminate the use of Once-through Cooling by Repowering Coastal Units by 2029, (5) Invest in the Power System Reliability Program, and (6) Promote a high scenario of Transportation Electrification. Based on the projections and strategies within the 2015 IRP, DWP projects it can meet the future demands of cumulative growth within its service area. Furthermore, in accordance with current building codes and construction standards, each of the related projects would be required to comply with the energy conservation standards established in Title 24 of the California Administrative Code. Compliance with Title 24 energy conservation standards and other energy conservation programs on the local level will further reduce cumulative energy demands. Cumulative impacts to electricity service would therefore be less than significant.

Natural Gas

Development of the Proposed Project in conjunction with the 99 related projects would further increase regional demands for natural gas resources. The total natural gas consumption by the Proposed and related projects would be 151,367,809 cubic feet per month (see Table IV.L-19, Estimated Cumulative Natural Gas Consumption). As a public utility provider, the SCG continuously analyzes increases in natural gas demands resulting from projected population and employment growth in its service area and it is anticipated that it would be able to meet the needs of future development within the region. As concluded in the 2016 California Gas Report, SCG has stable gas storage and projected supplies to meet market demands through 2035 growth forecasts. Additionally, compliance with energy conservation standards pursuant to Title 24 of the California Administrative Code would reduce cumulative demands for natural gas resources. The 2016 California Gas Report shows that in 2015, single family and overall multi-family temperature-adjusted average annual use per meter was 474 therms and 312 therms, respectively. Over the forecast period, the demand per meter is expected to decline at an average annual rate of 0.7 percent. The decline in use per meter for residential customers is explained by conservation, improved building and appliance standards, energy efficiency programs, and demand reductions anticipated as the result of the deployment of advanced meter infrastructure in the Southern California area.. In addition, each of the related projects would be reviewed on a case-by-case basis to determine the Gas Company's ability to serve each project. As such, it is anticipated the related projects in the vicinity would likely also be accommodated by SCG. Cumulative impacts upon natural gas resources and infrastructure would therefore be less than significant.

c. Project Design Features

See PDF E-1 in Section 3, Greenhouse Gas Emissions, above

7. Public Services

A. Schools

a. Project Impacts

The Proposed Project would result in a less than significant impact upon school services with mitigation. The proposed project would result in the development and operation of 369 new multi-family housing units with an estimated 1,148 new residents. The existing on-site land uses and the proposed land uses were analyzed to estimate the number of school-age student generation for existing and future conditions. The Proposed Project is estimated to generate approximately 60 additional elementary students, 17 middle school students, and 35 high school students for a total of 112 students. While it is likely that some of the students generated by the Proposed Project would already reside in areas served by LAUSD and would already be enrolled in LAUSD schools, for a conservative analysis, it is assumed that all students generated by the Project would be new to the LAUSD.

As demonstrated in the Draft EIR, the schools serving the Project Site are below capacity and would therefore be able to accommodate the additional students generated by the Proposed Project. Pursuant to SB 50 the mandatory payment of developer fees to the LAUSD are deemed to provide full and complete mitigation of school facilities impacts. Therefore, the Project's operational impacts upon schools would be less than significant.

b. Cumulative Impacts

The Proposed Project, in combination with the 99 related projects is expected to result in a cumulative increase in the demand for school services. It is important to note that of the 99 related projects, four involve the development or redevelopment of either public or private schools. Together the related projects would have the potential to generate students that would attend the same schools as the Proposed Project. The related projects would generate approximately 3,325 elementary students, 940 middle school students and 1,881 high school students. Of the 6,255 students generated by the Project and related projects, the Project represents approximately 1.74% of the cumulative students generated.

Many of the students generated by the related projects reside in areas served by the LAUSD and would already be enrolled on LAUSD schools. It can also be reasonably expected that many new students would attend private or charter schools, which are not accounted for in the LAUSD student capacity statistics presented in Table IV.J-8, in the Draft EIR. Furthermore, as with the Proposed Project, each of the related projects would be expected to pay required developer school fees to the LAUSD (pursuant to SB 50) to reduce any impacts they may have on school services. While cumulative development would appear to cause new student generation to exceed current seating capacity, the provisions of SB 50, discussed above, provide full and complete mitigation of school facilities impacts. The payment of these fees by the Project and the related projects would be mandatory, and would reduce the cumulative impact upon school services to a less-than-significant level.

c. Project Design Features

The Proposed Project did not identify any Project Design Features to address impacts to schools.

B. Recreation and Parks

a. Project Impacts

The proposed Project would result in a less than significant impact upon recreation and park facilities. Implementation of the Proposed Project would include the construction of 369 residential dwelling units and 22,000 square feet of ground-floor retail. It is estimated that the development of the Project would result in an increase of up to 1,148 new residents to the Westlake Community Plan Area and would therefore create an additional demand on the parks and recreation facilities. Based on the City's standard parkland ratio goal of 4 acres per 1,000 residents, the Project would generate a need for approximately 4.6 additional acres of public parkland. This need would be met through a combination of on-site open space and amenity areas and monetary contributions to the Park and Recreational Sites and Facilities Fund for the provision of recreation and park facilities in the Project vicinity. Park needs of residents would also be satisfied by approximately 722.06 acres of parkland in 24 parks within an approximately two mile radius of the Project Site. The Project includes development of 369 dwelling units and thus is subject to the open space requirements of LAMC Section 12.21 G and the development standards of the Central City West Specific Plan.

The Proposed Project would incorporate a variety of public and private open space areas and amenities throughout the Project Site to accommodate the needs of residents and visitors. The Proposed Project would provide approximately 40,675 square feet of total common and private open space and amenities on-site available exclusively to serve Project residents and their guests. The Project would include a total of 36,900 square feet of common open space consisting of a variety of on-site amenities including, but not limited to, common open space, banquet seating, sky deck, courtyard, fitness center, soft lounge seating, cabana, pool and spa, a ping-pong table, barbecue pit, firepits, outdoor kitchen island with seating, and a dog wash station. The Proposed Project's open space and on-site amenity design features are identified in Section II, Project Description. Approximately 3,775 square feet of private open space areas would be provided the on balconies of residential units. The conceptual open space and landscape plan for the ground level, second, third, fifth, and roof levels are shown in Figures II-27 –II-31, respectively.

In addition to the on-site open space provided within the Proposed Project, the Proposed Project is subject to a tax of $200 per dwelling unit pursuant to LAMC Section 21.10.3(a)(1) (Dwelling Unit Construction Tax). This tax, payable to the Department of Building and Safety, shall be deposited into a "Park and Recreational Sites and Facilities Fund" to be used exclusively for the acquisition and development of park and recreational sites. In accordance with LAMC Section 21.10.3(a)(1), this tax may be offset or reduced based on the amount of on-site open space and recreational amenities provided on-site. Therefore, under the City's mandatory Dwelling Unit Construction Tax, which is collected prior to a certificate of occupancy for residential land uses, and with the above-mentioned on-site Project features that would reduce the demand for park services, the Proposed Project would not increase the use of existing parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated, and would not result in substantial adverse physical impacts associated with the provision of new or physically altered parks. Therefore, impact upon parks and recreational facilities would be less than significant.

b. Cumulative Impacts

Development of the Project in conjunction with the 99 related projects could result in an increase in permanent residents residing in the Project area. In the absence of mitigation, additional cumulative development would contribute to lowering the City's existing parkland to population ratio, which is currently below the preferred standard. However, each of the residential related projects are expected to comply with payment of Quimby (for condominium units) and other fees, such as the Parks and Recreation Fee (for apartment units). Therefore, with payment of the

applicable recreation fees on a project-by-project basis, along with the provision of open space for the residential projects pursuant to LAMC Section 12.21G, the cumulative park impacts related to parks and recreational facilities would be reduced to a less-than-significant level.

c. Project Design Features

The Proposed Project did not identify any Project Design Features to address impacts to recreation and parks.

G. IMPACTS FOUND TO BE LESS THAN SIGNIFICANT AFTER MITIGATION

The following impact areas were concluded by the EIR to be less than significant with the implementation of mitigation measures described in the EIR and included in the MMP. Based on that analysis and other evidence in the administrative record relating to the project, the City finds and determines that mitigation measures described in the Final EIR and included in the MMP will reduce potentially significant impacts identified for the following environmental impact categories to below the level of significance:

1. Cultural Resources (Archaeological, Paleontological and Tribal Resources)

a. Project Impacts

Although no known archaeological resources are known to occur within the Project Site, the unlikely discovery of unknown archaeological resources during earthwork and excavation could result in a potentially significant environmental impact. Compliance with existing laws and regulations governing archaeological resources and Mitigation Measure MM C-2 would reduce potential impacts upon archaeological resources to less than significant levels.

The results of the CHRIS records search did not identify any known archaeological resources within the Project Site. However one archaeological resource has been recorded within a ½ mile radius of the Project Site. The Project area has not been previously surveyed for the presence of archaeological resources and the existing development on the site precludes the potential for subsurface exploration without demolition. Construction of the Proposed Project would entail demolition of the existing structures and excavation to a depth of approximately 19 to 32 feet below grade. In the absence of any known archaeological resources, the Proposed Project would not result in a significant impact upon a known archaeological resource. In the event that archaeological resources or human remains are encountered during the construction phase, work in the area of the find shall be halted until a qualified archaeologist and/or paleontologist has evaluated the find and provided recommendations for to comply with California Public Resources Code Section 21083.2 for the proper handling of such resources and with State Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097.98 for the proper handling of human remains. While this process is routinely followed in accordance with standard building practices, the incorporation of Mitigation Measure C-2 would further ensure any potential impacts to archaeological resources are reduced to less than significant levels. Similarly, if any human remains are encountered unexpectedly during construction demolition and/or grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code (PRC) Section 5097.98. Accordingly, with compliance of the applicable regulations and implementation of Mitigation Measure C-2, the Proposed Project would result in a less than significant impact upon archaeological resources.

Paleontological Resources

Although no known paleontological resources are known to occur within the Project Site, the unlikely discovery of unknown paleontological resources during earthwork and excavation could result in a potentially significant environmental impact. Compliance with existing laws and regulations governing the discovery of paleontological resources reduce potential for impacts to less than significant levels.

The results of the Natural History Museum Vertebrate Paleontology Section records search did not identify any known paleontological resources within the Project Site. Thus, construction of the Proposed Project would not result in any significant impacts to a known or previously recorded paleontological resource. However, multiple paleontological resource localities have been recorded in the general Project vicinity. Construction of the Proposed Project would entail demolition of the existing structures and excavation to a depth of approximately 19 to 32 feet below grade. Excavations below the very uppermost layers of older Quaternary Alluvium, as well as any excavations in the exposures of the Fernando Formation or the Puente Formation have the potential to uncover significant vertebrate fossils. The Natural History Museum recommends that any substantial excavations should be monitored closely to quickly and professionally recover any fossil remains discovered while not impeding development. In the event that paleontological resources are encountered during the construction phase, work in the area of the find shall be halted until a qualified paleontologist has evaluated the find and provided recommendations to comply with California Public Resources Code Section 21083.2 for the proper handling of paleontological resources. As such, compliance with existing regulations would reduce potential impacts upon paleontological resources to less than significant levels.

Native American Tribal Resources

No specific Native American Tribal Resources or sacred lands have been identified or are known to occur within the Project Site. However, the unlikely discovery of human remains could result in a potentially significant environmental impact associated with sacred lands or tribal resources. Compliance with existing laws and regulations governing the discovery of human remains and/or archaeological resources and implementation of Mitigation Measure C-2 would reduce potential impacts to less than significant levels.

In compliance with AB 52, the City of Los Angeles (Lead Agency) distributed AB 52 tribal consultation notices related to the Proposed Project to three tribes within the greater Los Angeles and southern California region. The City received one response letter, from the Fernandeno Tataviam Band of Mission Indians, dated June 30, 2016. Copies of this consultation request letter and the response letter are provided in Appendix E.4 of the Draft EIR. The Fernandeno Tataviam Band of Mission Indians ("Tataviam") formal AB 52 response letter stated that due to the facts that the Project is located within the area of sensitivity of the village Yanga, within the area of sensitivity of a known burial site, and the development that has occurred on the Project Site prior to the protections of CEQA, they recommend that the Lead Agency implement specific mitigation that includes entering into an agreement with the Fernandeno Tataviam Band of Mission Indians as a condition of approval by the Lead Agency in which Tataviam shall be identified to provide on-site mitigation monitoring services. However, due to lack of specific evidence to support the need for active monitoring, the relatively broad territory encompassing the village Yanga cited in the response letter, there is no evidence to support a requirement for active mitigation monitoring beyond the statutory requirements of California Public Resources Code Section 21083.2 governing the protection of archeological resources.

Additionally a CHRIS records search was conducted by the SCCIC. The records search yielded no known archaeological resources within the Project Site and one archaeological resource within a ½ mile of the Project Site. As such, construction of the Proposed Project would not significantly impact any known Native American cultural resources. In the unlikely event that archaeological resources or human remains are encountered during the construction phase, work in the area of the find shall be halted until a qualified archaeologist has evaluated the find and provided recommendations for to comply with California Public Resources Code Section 21083.2 for the proper handling of archaeological resources and with State Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097.98 for the proper handling of human remains. Similarly, if human remains are discovered at the Project Site during construction, work at the specific construction site at which the remains have been uncovered shall be suspended, and the City Public Works Department and County Coroner shall be immediately notified. If the remains are determined by the County Coroner to be Native American, the Native American Heritage Commission (NAHC) shall be notified within 24 hours, and the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains.

Notwithstanding compliance with the laws and regulations addressed above, for purposes of addressing the Tataviam's concerns under their AB 52 request for consultation, mitigation measure MM C-2 is recommended to ensure for the protection of tribal resources should any such resources be unearthed during construction, and would specifically require the Applicant to contact the Tataviam directly in the event tribal resources are encountered. Compliance with existing regulations and Mitigation Measure C-2 would therefore reduce potential impacts upon Native American cultural resources to less than significant levels.

c. Cumulative Impacts

With regards to archeological resources, paleontological resources, and Native American Tribal resources, the Proposed Project would comply with all applicable regulatory compliance measures that establish procedures if a find were to occur during the construction of the Proposed Project. Implementation of Mitigation Measure MM C-2 would further ensure that potential impacts to archeological resources and Native American Tribal resources would be less than significant. Additionally, each of the related projects would be subject to the same regulatory procedures for evaluating and avoiding or mitigating impacts upon archaeological resources, paleontological resources, and Native American Tribal resources. For this reason, the Proposed Project's incremental contribution to a cumulative impact would not be cumulatively considerable. Cumulative impacts to archeological resources, paleontological resources, and Native American Tribal resources would be less than significant.

d. Project Design Features

The Proposed Project dis not identify or propose any Project Design Features associated with archaeological, paleontological or Native American Tribal resources.

e. Mitigation Measures

MM C-2 In the event any archaeological materials are encountered during the course of project development, all construction activity shall halt in the area of the discovery and the services of an archaeologist shall 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 recommendations, 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 to the satisfaction of the Planning Director. The archaeological survey, study or report shall be submitted to: SCCIC Department of Anthropology, McCarthy Hall 477, CSU Fullerton, 800 North State College Boulevard, Fullerton, CA 92834. Additionally, the Fernandeno Tatavium Band of Mission Indians shall be contacted (by email: kfatehi@tataviam-nsn.us and by phone: (818) 837-0794 or by contacting the Native American Heritage Commission (NAHC) to ascertain whether the resource is affiliated with their tribal ancestors.

e. Findings

Changes or alterations have been required in, or incorporated into, the proposed Project that avoid or substantially lessen potential significant environmental effects on archaeological, paleontological and tribal resources as identified in Section V.C, Cultural Resources in the EIR, to less than significant levels.

f. Rationale for Findings

No adverse impacts associated with archaeological, paleontological and tribal resources would occur as a result of the development of the proposed Project with incorporation of Mitigation Measures C-2 as identified above and set forth in the MMP. In addition, cumulative impacts with regard to archaeological, paleontological and tribal resources would be less than significant.

g. Reference

For a complete discussion of environmental impacts with respect to archaeological, paleontological and tribal resources, please see Section IV.C, Cultural Resources, of the Draft EIR and Section II, Corrections and Additions, of the Final EIR.

2. Geology/Soils

a. Project Impacts

The Proposed Project would not exacerbate existing hazardous environmental conditions by exposing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: rupture of a known earthquake fault, strong seismic ground-shaking, seismic-related ground failure, including liquefaction, or landslides.

Ground Failure

Surface Rupture

The Project Site is not located within a seismic hazard zone for faulting, as delineated by the State of California, in accordance with the Seismic Hazards Mapping Act or the Alquist-Priolo Act. The City of Los Angeles ZIMAS system shows the closest fault to the Project Site is the Puente Hills Blind Thrust fault located approximately 1.16 kilometers from the Project Site. As such, the potential for surface rupture at the Project Site is currently low. Further, the CBSC and the City of

Los Angeles Uniform Building Code, with which the Project would be required to comply, contain construction requirements to ensure that structures are built to a level such that they can withstand acceptable seismic risk. Therefore, the Project would not cause or exacerbate the potential for surface rupture at the Project Site, and impacts related to surface rupture would be less than significant.

Ground Shaking

The primary seismic hazard for the Project Site is the potential for strong ground motion. The Project Site is susceptible to ground motion and shaking as a result of potential movement along faults in the region. The Project is located in a seismically active region, as is all of Southern California. These geologic hazards are common and ubiquitous throughout Southern California. The Project would be designed and constructed in conformance with the most recently adopted CBSC design parameters, which are specifically tailored to minimize the risk of structure failure due to seismic hazards.

Conformance with the CBSC and the City of Los Angeles Uniform Building Code would ensure that impacts relating to ground shaking would be less than significant. Further, the Geotechnical Report recommends site parameters for seismic design. The Project Site is considered suitable for the construction of the Proposed Project provided that the recommendations specified in the Geotechnical Investigation are included in the design and construction of the Proposed Project to the satisfaction of the Department of Building and Safety. Development of the Project would not promote or intensify ground shaking on-site, and thus would not cause or exacerbate hazardous conditions associated with ground shaking. The Project shall comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter dated June 16, 2017 (included as Appendix F-3 to this EIR) and Project's Geotechnical Investigation prepared by Geotechnical Professionals, Inc., dated December 11, 2014, and as it may be subsequently amended or modified. Compliance with the recommendations of the Project's Geotechnical Investigation as approved by the Department of Building and Safety would ensure that potential impacts associated with ground shaking are less than significant.

Liquefaction, Settlement, and Lateral Spreading

The Project Site is not located with a seismically induced landslide or liquefaction hazard zone, as delineated by the State of California. In addition, based on the City of Los Angeles Safety Element "Areas Susceptible to Liquefaction" map, the Project Site is not located within a liquefiable area, or potentially liquefiable area. Furthermore, the stiff to very stiff cohesive soils and bedrock encountered in the explorations would not be susceptible to liquefaction, even if groundwater levels were to rise above the current levels. The site-specific liquefaction analysis indicates that the Project Site's soils would not be prone to liquefaction during the ground motion expected during the design basis earthquake. Development of the Project would not cause or promote liquefaction on-site, and thus the Proposed Project would not exacerbate any existing hazardous conditions associated with liquefaction, settlement or lateral spreading. Liquefaction conditions would remain low, and the risk for liquefaction-included settlement and lateral spreading would remain low. As such, a less than significant impact would occur with respect to liquefaction.

Landsliding

Based on the City of Los Angeles Safety Element "Landslide Inventory & Hillside Areas" map, the Project Site is not located within a hillside area, or within a landslide area. Further, the Project

Site is located within a highly urbanized area within the City of Los Angeles. The probability of landslides, including seismically induced landslides, is considered to be very low. The Project Site is currently developed, and development of the Project would not cause or exacerbate the potential for landslides to occur on- or off-site. As such, a less than significant impact would occur with respect to landslides.

Lateral Spreading, Subsidence, and Collapse

As discussed above, the Project Site is not located within a liquefiable area, potentially liquefiable area, a hillside area, or within a landslide area. The Geotechnical Investigation states that the stiff to very stiff cohesive soils and bedrock encountered on-site would not be susceptible to seismic subsidence, even if groundwater levels were to rise. As such, the current risk of lateral spreading, subsidence, and collapse is considered low. The risk of lateral spreading, subsidence, and collapse would remain low with the development of the Project. The development of the Project would not cause or promote lateral spreading, subsidence, or collapse. As such, the proposed Project would not exacerbate any potential hazards associated with lateral spreading, subsidence, and collapse and Project impacts related to such conditions would be less than significant.

Construction

The Proposed Project would result in a less than significant impact with respect to soil erosion due to the loss of topsoil and, as such, would not create a geologic hazard to other properties by causing or accelerating instability from erosion or result in sediment runoff or deposition that would not be contained or controlled on site.

The existing Project Site is nearly 100 percent impervious, and after Project development, the Project Site would continue to be nearly 100 percent impervious. The Project would not significantly alter the on-site drainage patterns due to the development of the buildings. Therefore, the Proposed Project would not result in on-site erosion because all runoff would be directed to areas of Best Management Practices and/or other storm drain infrastructure. During construction, however, soils could be exposed to the elements. The Proposed Project would be designed to comply with the Construction General Permit Water Quality Order 2009-0009-DWQ as amended by Order No. 2010-0014-DWQ to prevent short-term construction-induced water quality impacts resulting from erosion and sedimentation issues. Similarly, as a regulatory requirement, the Project requires the preparation of a Stormwater Pollution and Prevention Plan (SWPPP) because construction activities would disturb more than one acre of land. The SWPPP would address construction impacts, especially during soil disturbing activities when soils are exposed to wind, rain and concentrated flows that could cause erosion. These mandatory requirements would minimize soil erosion and the transmission of sediment into the City's separate storm sewer system.

Although development of the Proposed Project has the potential to result in the erosion of soils during site preparation and construction activities, erosion would be reduced by implementation of stringent erosion controls imposed by the City of Los Angeles through grading and building permit regulations. The Project Site is located in a special grading area. All grading activities require grading permits from the Department of Building and Safety, which include requirements and standards designed to limit potential impacts to acceptable levels. In addition, all on-site grading and site preparation would comply with applicable provisions of Chapter IX, Division 70 of the LAMC, which addresses grading, excavations, and fills. The Project shall be designed and constructed in accordance with the requirements outlined in the latest edition of the City of Los

Angeles Uniform Building Code, including all applicable provisions of Chapter IX, Division 70 of the LAMC, which addresses grading, excavations and fills. All grading activities require grading permits from the Department of Building and Safety. The application of Best Management Practices would include but not be limited to the following 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. Implementation of regulatory measures would further ensure a less-than-significant impact would occur with respect to erosion or loss of topsoil. Therefore, Project impacts related to sedimentation, erosion and loss of topsoil during construction would be less than significant.

Operational Impacts

Similar to the existing uses on the Project Site, the Proposed Project would continue to generate surface water runoff. Aside for small landscaped areas, the Project Site is completely covered with impervious surfaces. As such, approximately 100 percent of the surface water runoff from the Project Site is directed to adjacent storm drains and does not percolate into the groundwater table beneath the Project Site. Potential impacts to surface water runoff would be reduced to a less than significant level by incorporating stormwater pollution control measures.

The Proposed Project would be required to comply with the City of Los Angeles Stormwater and Urban Runoff Pollution Control Ordinance (Ordinance No. 172,176, effectuated October 1998), which established LAMC Sections 64.70 through 64.70.13 and set the foundation for stormwater management in the City of Los Angeles. Since the adoption of the Stormwater and Urban Runoff Pollution Control Ordinance, many additional ordinances have passed to keep LAMC Article 4.4, Stormwater and Urban Runoff Pollution Control, up to date. Approved in October 2011, the Low Impact Development (LID) Ordinance (Ordinance No. 181,899) expanded LAMC Article 4.4 and expanded the applicability of the existing Standard Urban Stormwater Mitigation Plan (SUSMP) requirements by imposing rainwater low impact development strategies on projects that require building permits. LAMC Article 4.4, including LID requirements, was recently amended in August 2015 with the approval of Ordinance No. 183,833, which incorporates the requirements of the Municipal Separate Storm Sewer (MS4) Permit. The Proposed Project would be required to prepare a LID Plan and demonstrate compliance with the LID requirements and standards and retain or treat the first ¾-inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater.

The Proposed Project falls within the second tier of the LID Ordinance requirements, which states that development projects that involve residential use with five or more units and result in an alteration of at least 50 percent or more of the impervious surfaces on an existing developed site, the entire site must comply with the standards and requirements of Article 4.4 of Chapter VI of the LAMC and with the Development Best Management Practices Handbook. The Proposed Project would be required to manage and capture stormwater runoff to the maximum extent feasible utilizing various LID techniques, including but not limited to infiltration, evapotranspiration, capture for use, and high removal efficiency bio-filtration / bio-treatment systems of all runoff on-site (listed in priority order). On-site stormwater management techniques must be designed so that no stormwater runoff leaving the Project Site for at least the volume of water produced by the Stormwater Quality Design Volume (SWQDv). Development and redevelopment projects are required to prepare a LID Plan, which comply with the provisions of the Development Best Management Practices Handbook. If partial or complete on-site compliance of any type is

technically infeasible, the Project Site and LID Plan shall be required to manage the flow from the SWQDv on-site in order to maximize on-site compliance.

In compliance with the LID Plan, prior to issuance of grading permits, the Applicant shall submit a LID Plan and design plans to the City of Los Angeles Department of Building and Safety and the Bureau of Sanitation Watershed Protection Division for review and approval. The Low Impact Development Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook. The BMPs shall be designed to retain or treat the runoff from a storm event producing ¾-inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event (whichever is greater), in accordance with the Planning and Land Development Handbook for Low Impact Development, Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect confirming that the proposed BMPs meet the numerical threshold standard shall be provided.

Compliance with the regulatory measures, as discussed above, would ensure that sedimentation, soil erosion, and loss of topsoil during the operation of the Proposed Project would be less than significant and water quality standards would be maintained.

Geotechnical Safety

The Proposed Project is not 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. With implementation of the project specific design considerations presented in the Geotechnical Report, environmental impacts associated with geotechnical safety would be less than significant. With the implementation of Mitigation Measure MM D-1 relating to soil corrosivity, environmental impacts associated with soil corrosivity would be less than significant.

Based on the results of the Geotechnical Investigation, the Project Site conditions are suitable for the development the Proposed Project as proposed, provided the geotechnical constraints discussed in the Geotechnical Report is incorporated into the design and construction of the Proposed Project. Provided below is a discussion on the Geotechnical Investigation's findings related to shrinkage and subsidence, soil corrosivity, foundations, and groundwater.

Shrinkage and Subsidence During Construction

Shrinkage is the loss of soil volume caused by compaction of fills to a higher density than the existing in-place density. Subsidence is the settlement of in-place subgrade soils caused by loads generated by large earthmoving equipment. For earthwork volume estimating purposes, an average shrinkage value of 10 percent and subsidence of 0.1 feet may be assumed for the natural soils and bedrock. It should be realized that the Project Site soils exhibit variable densities, making shrinkage factors difficult to determine. These values are estimates only and exclude losses due to removal of vegetation or debris. Actual shrinkage and subsidence will depend on the types of earthmoving equipment used and should be determined during grading. Compliance with the City of Los Angeles Uniform Building Code and any site-specific recommendations or conditions imposed by the Department of Building and Safety as part of their review and approval of the Project's Geotechnical Investigation would ensure that impacts relating to shrinkage and subsidence would be less than significant.

Soil Corrosivity

HDR Engineering performed a soil corrosivity study ("Soil Corrosivity Study") at the Project Site (See Appendix F-2 to this DEIR). Laboratory tests were completed on two soil samples provided by Geotechnical Professionals. The purpose of the tests was to determine if the soils might have deleterious effects on underground utility piping, hydraulic elevator cylinders, and concrete structures. The Soil Corrosivity Study found that the soil at the Project Site is classified as severely corrosive to ferrous metals and severe for sulfate attack on concrete. Due to soil corrosivity conditions at the Project Site that could affect underground utility piping, hydraulic elevator cylinders, and concrete foundations, the Proposed Project would comply with the corrosion control recommendations contained in the Soil Corrosivity Study (refer to Mitigation Measure MM D-1 below). Compliance with the conditions contained within the Project's Soil Corrosivity Study and the conditions of approval set forth in the Department of Building and Safety's Geology and Soils Report Approval Letter would sure that impacts relating to soil corrosivity would be less than significant.

The Soil Corrosivity Study provides corrosion control recommendations for steel pipes, hydraulic elevators, iron pipes, copper tubing, plastic and vitrified clay pipes, all pipes, and concrete. The recommendations for steel pipe, hydraulic elevator, and iron pipe includes two options that the Applicant may implement to protect each system against soil corrosivity. The Applicant would have to comply with the full list of recommendations listed for the chosen option to the satisfaction of the Department of Building and Safety. The Applicant would be required to comply with the full recommendation list described for copper tubing, plastic and vitrified clay pipes, all pipes, and concrete to the satisfaction of the Department of Building and Safety. With adherence to MM D-1, the Proposed Project would result in a less than significant impact with respect to the potential to exacerbate existing environmental conditions relating to corrosive soils.

Foundations

The two buildings would be supported directly on weathered bedrock, with foundation support characteristics comparable to those of very stiff to hard clay. Foundation design parameters would be governed by allowable settlement considerations rather than ultimate bearing capacity.
The Geotechnical Investigation includes detailed recommendations for both conventional footings and deep foundations. As discussed previously, a final design geotechnical and seismic study, including additional subsurface investigations and evaluation, would be performed at the Project Site once final structures and loads are determined, prior to final foundation design. Construction of the Proposed Project would be required to comply with the City of Los Angeles Uniform Building Code, which includes building foundation requirements appropriate to site-specific conditions, as recommended in the Geotechnical Investigation. The mandatory code-compliance measures would ensure that the Project's impacts would be reduced to less than significant.

Groundwater

As discussed above, the Project Site is nearly 100 percent impervious. As such, nearly 100 percent of the surface water runoff from the Project Site is directed to adjacent storm drains and does not percolate into the groundwater table beneath the Project Site. Storm water is removed from the Project Site primarily by sheet flow action across the paved surfaces towards storm water drains located throughout the Project Site and in the public right-of-way. Site stormwater from roofs, landscaped areas, and paved areas is directed to on-site concrete swales, which drain to the public right-of-way, and to on-site water drains. The subject property is connected to a municipal owned and maintained sewer system.

Groundwater on-site was found to range between 325 to 338 feet above MSL, approximately 45 to 32 feet below the ground surface. Historical groundwater levels are reported at an average elevation of 320 feet above MSL, approximately 50 feet below the ground surface. For design purposes, groundwater was assumed to be at an elevation of 340 feet AMSL (or approximately 30 feet below ground surface). The Proposed Project would excavate soils beneath the Project Site to depths ranging from 19 to 32 feet below grade. As such, the Proposed Project may extend into the groundwater table. Any water seeping into the excavation should be pumped out before placing concrete in the excavation. This process, called dewatering, is controlled and regulated by the Los Angeles Regional Water Quality Control Board, which authorizes discharges of groundwater from construction and project dewatering to surface waters in Coastal Watersheds of Los Angeles. If required, any dewatering activities during construction shall comply with the requirements of the Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (Order No. R4-2008-0032, National Pollutant Discharge Elimination System No. CAG994004) or subsequent permit. This will include submission of a Notice of Intent for coverage under the permit to the Los Angeles Regional Water Quality Control Board at least 45 days prior to the start of dewatering and compliance with all applicable provisions in the permit, including water sampling, analysis, and reporting of dewatering-related discharges. Compliance with the regulatory measures as discussed above would reduce potential impacts relating to groundwater and dewatering activities to less than significant levels.

For design purposes, the Geotechnical Engineer has assumed the depth to groundwater at approximately 340 feet ASML. The Proposed Project's foundations would range from 19 to 32 feet below grade and thus may be in contact with fluctuating groundwater levels over time. As recommended in the Geotechnical Investigation, all concrete slabs should be supported on a 10-inch layer of compacted free draining rock (such as Caltrans Class 2 Permeable Material) placed over undisturbed bedrock. The main purpose of the rock layer under the slab is to serve as a subdrain in case there is a rise in groundwater levels. Thus, it is recommended that the rock layer be hydraulically connected to sump(s) where any groundwater intercepted by the subdrain could be pumped out. The rock layer would also serve as a stable subgrade surface to protect the cohesive subgrade from swelling or shrinking due to moisture variations. These design recommendations are contained in the Project's Geotechnical Investigation, which would be reviewed and approved by the City's Department of Building and Safety as part of the geotechnical review process. With compliance with regulatory measures, the Propose Project's potential impacts relating to groundwater-related geotechnical hazards would be less than significant.

Expansive Soils

The Project Site not located on expansive soil, and thus would result in a less than significant impact with respect to creating substantial risks to life or property.
Under the existing moisture conditions, the undisturbed cohesive bedrock materials do not exhibit significant potential for expansion. However, these materials become highly expansive when excavated, dried and used as compacted fill. Therefore, the clayey fills derived from the native bedrock would not be suitable for retaining wall backfill or slab support for the Proposed Project. As such, Geotechnical Investigation recommends the use of imported, predominately granular, non-expansive, contains less than 40 percent fines, and no particles larger than 6 inches material be used for the subgrade fill and backfill for retaining walls.

Furthermore, the bedrock surface should not be allowed to dry during construction. A 10-inch layer of well graded drainage rock should be placed over the excavated bedrock surface, partly

to minimize the potential for drying and to provide a relatively weather proof working surface in the basement excavation, and partly to provide a subdrainage in case groundwater levels rise from their current levels. As such, development of the Project would not create substantial risks to life or property caused in whole or in part by the project exacerbating the expansive soil conditions. Impacts related to expansive soil would be reduced to less-than-significant levels with adherence to the geotechnical recommendations in the Project's Geotechnical Investigation and Building and Safety's Soil Report Approval letter and adherence with the City of Los Angeles Uniform Building Code.

b. Cumulative Impacts

Geotechnical impacts related to future development in the City of Los Angeles would involve hazards related to site-specific soil conditions, erosion, and ground-shaking during earthquakes. Such conditions are site-specific and would not be common to (nor shared with, in an additive sense) the impacts on other sites that are not physically connected. Cumulative development in the area would increase the overall population for exposure to seismic hazards by increasing the number of people potentially exposed. However, with adherence to applicable State and Federal regulations, buildings codes and sound engineering practices, geologic hazards could be reduced to less-than-significant levels. Furthermore, development of each of the related projects and the Proposed Project would be subject to uniform site development and construction review standards that are designed to protect public safety. Therefore, cumulative geotechnical impacts would be less than significant.

c. Project Design Features

The Proposed Project does not include any project design features associated with geology and soils.

d. Mitigation Measures

MM D-1 Prior to the issuance of a grading permit, the Applicant shall remediate soil corrosion hazards to the Project by demonstrating compliance with the corrosion control recommendations contained within the Soil Corrosivity Study (dated January 12, 2017) to the satisfaction of the Los Angeles Department of Building and Safety.

e. Findings

Changes or alterations have been required in, or incorporated into, the proposed Project that avoid or substantially lessen potential significant environmental effects on Geology and Soils, as identified in the EIR, to less than significant levels.

f. Rationale for Findings

No adverse impacts associated with Geology and Soils would occur as a result of the development of the proposed Project with incorporation of Mitigation Measures D-1 as set forth in the MMP. Considering the investigation process required under the engineering standard of care, compliance with State laws and City regulatory requirements, technical review and approval by the California Office of Statewide Health Planning and Development, and the Los Angeles Department of Building and Safety of a design-level geotechnical engineering report, and adherence to the mitigation measures proposed above, the Project's impacts related to geology

and soils would be less than significant. In addition, cumulative impacts with regard to geology and soils would be less than significant.

h. Reference

For a complete discussion of environmental impacts with respect to Geology and Soils, please see Section IV.D, Geology and Soils, of the Draft EIR and Section II, Corrections and Additions, of the Final EIR.

3. Hazardous Materials/Risk of Upset

a. Project Impacts

The Proposed Project would result in a less than significant impact associated with the routine transport, use or disposal of hazardous materials with adherence to applicable laws and regulations.

During the construction phase, the Proposed Project is anticipated to require the routine transport, use and disposal of cleaning solvents, fuels, paints and paint-related products, waste oil, spent solvents, oily rags and other potentially hazardous materials commonly associated with construction activities. Construction activities would likely involve the use and storage in small quantities of potentially hazardous materials, including vehicle fuels, oils, and transmission fluids. Due to the age of the existing buildings proposed for demolition, asbestos-containing materials and lead based paint may be present. Asbestos and lead have negative health impacts, and employees that currently work at the Project Site and construction personnel may be exposed to asbestos fibers and lead during demolition activities. The abatement and removal of asbestos is regulated by the South Coast Air Quality Management District's Rule 1403. Lead-based paint materials exposure is regulated by the California Occupational Safety and Health Administration (CalOSHA) regulations. California Code of Regulations Section 1532.1, requires testing and monitoring of potential containments and disposal of lead based paint materials such that exposure levels do not exceed CalOSHA standards for worker exposure. All potentially hazardous materials used during demolition and construction activities would be handled, contained, stored, and used in accordance with all applicable local, State, and federal regulations, which include requirements for disposal of hazardous materials at a facility licensed to accept such waste based on its waste classification and the waste acceptance criteria of the permitted disposal facilities. Adherence to all applicable rules and regulations pertaining to the use, storage, and transport of potentially hazardous materials would reduce potentially significant impacts to less-than-significant levels.

- Reasonably Foreseeable Upset and Accident Conditions

Construction activities associated with the Proposed Project would result in a less than significant impact with respect to reasonably foreseeable upset and accident conditions involving the release of gasoline-range petroleum hydrocarbons and other contaminants into the environment. Adherence to applicable laws and regulations pertaining to the removal, transport, and disposal of potentially hazardous asbestos containing materials, lead based paint, and low risk contaminated soils or groundwater would ensure impacts are less than significant and no further mitigation is warranted.

Asbestos-Containing Materials (ACMs)

Asbestos is the name given to a number of naturally occurring, fibrous silicate minerals mined for their useful properties such as thermal insulation, chemical and thermal stability, and high tensile strength. Asbestos is commonly used as an acoustic insulator, thermal insulation, fire proofing and in other building materials. Exposure to airborne friable asbestos may result in a potential health risk because persons breathing the air may breathe in asbestos fibers. Continued exposure can increase the amount of fibers that remain in the lung. Fibers embedded in lung tissue over time may cause serious lung diseases including: asbestosis, lung cancer, or mesothelioma.

The commercial office and medical office buildings on-site were constructed in 1955 and 1968. The Phase I ESA identified the presence of materials that potentially contain ACMs, which include drywall systems, floor tiles, acoustical ceiling tiles, strayed-on acoustical ceiling, and roofing materials. Since the existing buildings on-site were constructed prior to the ban on the use of asbestos, there is the potential that demolition of these buildings could release asbestos-containing materials presented in the structures. Exposing workers to ACMs during demolition activities would be a significant impact. Prior to the demolition activities, a complete asbestos survey would be conducted to identify all sources of asbestos, as required by the U.S. EPA National Emission Standard for Hazardous Air Pollutants (NESHAP) regulation and the South Coast Air Quality Management District's (SCAQMD's) Rule 1403. Bulk samples of all materials that are suspected of containing asbestos would be collected and analyzed for asbestos content. Asbestos removal is stringently controlled by Federal Regulations and SCAQMD Rule 1403. Removal of asbestos in a building is not unusual and can be readily accomplished. In accordance with the EPA's NESHAP regulation and SCAQMD's Rule 1403, all materials that are identified as ACMs would be removed by a trained and licensed asbestos abatement contractor. The asbestos removal operations would be conducted in accordance with CAL-OSHA Asbestos for the Construction Industry Standard, SCAQMD and EPA rules and regulations and industry standards. The contractor selected for the removal process would be chosen based on experience, reputation, and relationship with local agencies such as SCAQMD and OSHA regional offices. Generally, asbestos removal operations are low risk. When following asbestos-related regulations, the possibility of exposure to airborne asbestos fibers from asbestos removal projects is limited. The SCAQMD has very specific regulations for asbestos emissions. Provided the removal and disposal of ACMs from the Project Site follows the various guidelines required by SCAQMD Rule 1403, as well as all other applicable state and federal rules and regulations, hazardous materials impacts relative to exposure to asbestos would be less than significant.

Lead-Based Paint (LBP)

Due to the age of the existing on-site buildings, lead-based paint may be present on-site. Exposure of workers to lead-based paint during demolition of the existing structures would be a significant impact. A qualified lead-paint abatement consultant would be required to comply with applicable state and federal rules and regulations governing lead paint abatement. Such regulations that would be followed during demolition include Construction Safety Orders 1532.1 (pertaining to lead) from Title 8 of the California Code of Regulations, and lead exposure guidelines provided by the U.S. Department of Housing and Urban Development (HUD). Demolition of the buildings would comply with standard handling and disposal practices pursuant to OSHA regulations. Compliance with mandatory state and federal regulations would ensure that the potential lead-based paint on-site would be handled properly and impacts associated with the exposure to lead-based paint would be less than significant.

Soil and Groundwater Conditions

In July 2016, the LARWQCB issued a closure notification letter concluding that no further action was required on the Project Site. The LARWQCB concluded that maximum reported concentrations of petroleum constituents in the soil will have no significant risk of adversely affecting human health. Further, the closure justification remarks indicated that based on the facts that low concentrations of fuel constituents were detected in the soil beneath the site (e.g., 0.011 mg/kg of xylenes), the actual risk of vapor intrusion to indoor air is low. The LARWQCB justification remarks further concluded that residual soil contamination would not cause any human and environmental risks via major pathways, such as direct contact, drinking water ingestion and vapor intrusion.

Based on the information presented above with regard to Adjacent Properties of Potential Concern, two of the adjacent properties (i.e., 1055 W. 6th Street (Former Hertz Rent-A-Car Site) and 1102 W. 6th Street (Good Samaritan Hospital Site) have prior cases of documented releases of petroleum hydrocarbon contaminated soils. While closure letters have been issued for both sites and no known migration of contaminated soils have been identified on-site, there remains some potential for contaminated soil or groundwater migration to affect the soils beneath the Project Site. In the event any suspected soil contamination is discovered during site excavation and grading, the project contractor would be responsible for limited testing to determine the appropriate soil disposal methods. The excavation, stockpiling and transport of potentially contaminated materials would be subject to the minimum standards for solid waste handling and disposal at an authorized facility pursuant to the California Code of Regulations, Title 4, Natural Resources. Division 7. Compliance with all applicable regulations would ensure impacts associated with the potential release of gasoline-range petroleum hydrocarbons and other contaminants into the environment would be less than significant.

The depth to groundwater was found to range between 325 to 338 feet above MSL, approximately 45 to 32 feet below the ground surface. Historical groundwater levels are reported at an average elevation of 320 feet above MSL, approximately 50 feet below the ground surface. For design purposes, groundwater was assumed to be at an elevation of 340 feet AMSL (or approximately 30 feet below ground surface). The Proposed Project would excavate soils beneath the Project Site to depths ranging from 19 to 32 feet below grade. As such, the Proposed Project may extend into the groundwater table. If dewatering activities are required, such activities would comply with the requirements of the Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (Order No. R4-2008-0032, National Pollutant Discharge Elimination System No. CAG994004) or subsequent permit. This would include submission of a Notice of Intent for coverage under the permit to the Los Angeles Regional Water Quality Control Board at least 45 days prior to the start of dewatering and compliance with all applicable provisions in the permit, including water sampling, analysis, and reporting of dewatering-related discharges. In the event dewatering activities are required, adherence to applicable regulations and procurement of all applicable permits would ensure potential impacts relating to the release of hazardous materials into the environment would be less than significant.

Hazardous Emissions to Sensitive Receptors

The Proposed Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school. With adherence to all applicable laws and regulations, potential impacts to sensitive receptors would be less than significant.

Surrounding uses near the Project Site that would be considered sensitive receptors regarding hazardous materials exposure include residential land uses, the Good Samaritan Hospital and existing schools within one-quarter mile (1,320 feet) of the Project Site. There are three Los Angeles Unified School District schools that are approximately 0.25 miles from the Project Site; these schools are: (1) Para Los Niños – Evelyn Thurman Gratts Primary School located at 474 S. Hartford Avenue (directly west of the Project Site); (2) Evelyn Thurman Gratts Elementary School located at 309 Lucas Avenue (0.15 miles north of the Project Site); (3) Miguel Contreras Learning Complex located at 322 S. Lucas Avenue (0.15 miles northeast of the Project Site). Further, the Good Samaritan Hospital is located approximately 0.05 miles west of the Project Site.

As discussed above, the LARWQCB issued a closure letter for the Project Site, concluding that maximum reported concentrations of petroleum constituents in the soil will have no significant risk of adversely affecting human health. Based on the low concentrations of fuel constituents that were detected in the soil beneath the site (e.g., 0.011 mg/kg of xylenes), the residual soil contamination beneath the site would not cause any human and environmental risks via major pathways, such as direct contact, drinking water ingestion and vapor intrusion. The potential for risk of upset to impact sensitive receptors would be less than significant with the implementation of best management practices and avoidance measures, and compliance with applicable health and safety laws and regulations for the use and storage, and transport of potentially hazardous materials commonly used during the construction of buildings.

Due to the proximity of several LAUSD schools in the area, Mitigation Measures F-1 and F-2 are recommended to ensure the contractor communicates with the LAUSD for purposes of reducing potential conflicts between school sites and pedestrian routes and the proposed hauling activities. The proposed haul route would be designed to minimize, to the greatest degree possible, impacts on the school and hospital facilities. The local haul route to and from the Harbor (I-110) Freeway would utilize 6th Street (traveling between the Project Site and the Harbor Freeway), Figueroa Street, and 5th Street (the portion on the west side of Harbor Freeway to access the freeway on-ramp). The construction vehicles are not expected to pass by the aforementioned schools or the Good Samaritan Hospital. The Proposed Project would comply with the applicable requirements and regulations to ensure that impacts relating to the demolition and construction would be less than significant. Furthermore, no hazardous materials other than typical cleaning supplies and solvents used for housekeeping and janitorial purposes would be stored and utilized on-site with the operation and activities of residential and commercial uses. The use of such substances would comply with State Health Codes and Regulations. Hazardous materials that would be used would be handled, transported and disposed in accordance with all applicable local, State and federal regulations. Implementation of Mitigation Measures MM F-1 and MM F-2 would ensure that the Proposed Project would have a less than significant impact upon nearby schools. A less than significant impact would occur with the construction and operation of the Proposed Project near sensitive receptors, including local schools and hospital.

Exacerbation of Current Environmental Conditions

The Proposed Project would not create or exacerbate current environmental conditions so as to result in a potentially significant impact with respect to the potential disturbance of contaminated soil and/or groundwater on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Compliance with existing regulatory processes governing the handling, transport, and disposal of potentially contaminated soil and/or groundwater would reduce potential impacts to less than significant levels.

The Project Site was identified as a HAZNET, CHMIRS, EDR Historical Auto Station and EDR Historical Cleaners site in the regulatory database report provided by Environmental Data Resources, Inc. In 2002 a 2,000-gallon diesel underground storage tank (UST) was removed from the Project Site. Based on soil sampling results associated with the removal of this UST, the LAFD determined that no further action was required and issued a no further action letter on June 18, 2003. In July 2016, after subsequent environmental sampling was conducted on the site to investigate potentially contaminated petroleum hydrocarbon-impacted soils, the LARWQCB issued a closure notification letter concluding that no further action was required on the Project Site. The LARWQCB concluded that maximum reported concentrations of petroleum constituents in the soil will have no significant risk of adversely affecting human health. Based on the low concentrations of fuel constituents that were detected in the soil beneath the site (e.g., 0.011 mg/kg of xylenes), the actual risk of vapor intrusion to indoor air is low. The LARWQCB further concluded that residual soil contamination would not cause any human and environmental risks via major pathways, such as direct contact, drinking water ingestion and vapor intrusion. In the event any suspected soil contamination is discovered during site excavation and grading, the project contractor would be responsible for limited testing to determine the appropriate soil disposal methods. The excavation, stockpiling and transport of potentially contaminated materials would be subject to the minimum standards for solid waste handling and disposal at an authorized facility pursuant to the California Code of Regulations, Title 4, Natural Resources. Division 7. Furthermore, as discussed above, if dewatering activities are required, such activities would be subject to the requirements of the Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties. Therefore, compliance with existing regulatory processes governing the handling, transport, and disposal of potentially contaminated soil and/or groundwater would reduce potential impacts to less than significant levels.

Impair or Interfere with Emergency Response or Evacuation Plan

The Proposed Project would result in a less than significant impact with respect to impairing the implementation of or physically interfering with an adopted emergency response plan or emergency evacuation plan with the implementation of Mitigation Measure MM K-1.

With respect to off-site impacts, the Project Site is not located on or near a City-designated selected disaster route. Therefore, operation of the Proposed Project would not cause any permanent alternations to evacuation routes and patterns, or impede emergency access or travel upon rights-of way. Furthermore, all construction activities resulting in temporary alterations to public access and right of way would be subject to the Department of Building and Safety and Department of Transportation permitting processes (Refer to Section IV.K, Traffic/Transportation, and Mitigation Measure MM K-1).

Construction activities have the potential to affect fire protection services, such as emergency vehicle response times, by adding construction traffic to the street network and by partial lane closures during street improvements and utility installations. These impacts, while potentially adverse, are considered to be less than significant. Partial lane closures would not greatly affect emergency vehicles, the drivers of which normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Additionally, if there are partial lane closures to streets surrounding the Project Site, flagmen would be used to facilitate the traffic flow until construction is complete.

Operation Impacts

The Proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials during operation, and a less than significant impact would occur.

The Proposed Project includes the construction of a mixed-use project with up to 369 residential units with 22,000 square feet of neighborhood serving retail. No hazardous materials other than modest amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes would routinely be transported to the Project Site. The use of these substances would comply with State Health Codes and Regulations. The operation of the Proposed Project would not use, transport, or disposal of hazardous materials. The Project's proposed buildings would comply with current regulations set by the Department of Building and Safety. Therefore, the Proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials during operation, and a less than significant impact would occur.

With respect to Project operation, the Proposed Project would not interfere with emergency response or an evacuation plan. As discussed in detail in Section IV.J, Public Services of the Draft EIR, site plans must be submitted to the LAFD and LAPD for their review and approval prior to the issuance of building permits. Therefore, police, fire, and emergency access would not be significantly impacted. Thus, the Proposed Project would have less than significant impact upon emergency response or evacuation plans.

b. Cumulative Impacts

Development of the Proposed Project in combination with the related projects has the potential to increase the risk for accidental release of hazardous materials. Each of the related projects would require evaluation for potential threats to public safety, including those associated with the accidental release of hazardous materials into the environment during construction and operation, emergency response, transport/use/disposal of hazardous materials, and hazards to sensitive receptors (including schools). Because hazardous materials and risk of upset conditions are largely site-specific, this would occur on a case-by-case basis for each individual project affected, in conjunction with development proposals on these properties. Implementation of the regulatory compliance measures and recommended mitigation measures would reduce the Proposed Project's potential impacts associated with the accidental release of hazardous materials during construction and operation as well as emergency response to less-than-significant levels, such that the Proposed Project would not combine with any of the related projects to cause a cumulatively significant impact. Further, each related project would be required to follow local, State and federal laws regarding hazardous materials and other hazards. Therefore, with compliance with local, State and federal laws pertaining to hazards and hazardous materials, cumulative impacts would be less than significant.

c. Project Design Features

The Proposed Project does not include any project design features associated with hazardous materials or risk of upset.

d. Mitigation Measures

MM F-1: The developer and contractors shall maintain ongoing contact with administrator of Para Los Niños – Evelyn Thurman Gratts School, Evelyn Thurman Gratts Elementary School, and the Miguel Contreras Learning Complex. The

administrative offices shall be contacted when demolition, grading and construction activity begin on the project site so that students and their parents will know when such activities are to occur. The developer shall obtain school walk and bus routes to the schools from either the administrators or from the LAUSD's Transportation Branch (323) 342-1400 and guarantee that safe and convenient pedestrian and bus routes to the school be maintained.

- The developer shall install appropriate traffic signs around the site to ensure pedestrian and vehicle safety.
- There shall be no staging or parking of construction vehicles, including vehicles to transport workers on any of the streets adjacent to any public schools.
- Due to noise impacts on the schools, no construction vehicles or haul trucks shall be staged or idled on these streets during school hours.

MM F-2: Haul route scheduling shall be sequenced to minimize conflicts with pedestrians, school buses and cars at the arrival and dismissal times of the school day. Haul route trucks shall not be routed past the school during periods when school is in session especially when students are arriving or departing from the campus.

e. Findings

Changes or alterations have been required in, or incorporated into, the proposed Project that avoid or substantially lessen potential significant environmental effects on Hazardous Materials and Risk of Upset, as identified in the EIR, to less than significant levels.

f. Rationale for Findings

No adverse impacts associated with Hazardous Materials and Risk of Upset would occur as a result of the development of the proposed Project with incorporation of Mitigation Measures F-2 and F-2 as set forth in the MMP. Considering the investigation process required under the engineering standard of care, compliance with State laws and City regulatory requirements, technical review and approval by the California Office of Statewide Health Planning and Development, and the Los Angeles Fire Department, and adherence to the mitigation measures proposed above, the Project's impacts related to Hazardous Materials and Risk of Upset would be less than significant. In addition, cumulative impacts with regard to Hazardous Materials and Risk of Upset would be less than significant.

g. Reference

For a complete discussion of environmental impacts with respect to Hazardous Materials and Risk of Upset, please see Section IV.F, Hazardous Materials and Risk of Upset, of the Draft EIR and Section II, Corrections and Additions, of the Final EIR.

4. Noise (Operational)

a. Project Impacts

Operational noise resulting from the Proposed Project's increased traffic volumes, parking lot noise, HVAC equipment and on-site activities would not increase by more than 3 dBA in CNEL to or within the "normally unacceptable" or "clearly unacceptable" category or result in a 5 dBA or greater noise increase at any off-site property. Therefore, the Proposed Project would not expose

persons to or generate noise levels in excess of established standards. Thus, operational noise impacts would be less than significant.

Roadway Traffic Noise

In order for a new noise source to be audible, there would need to be a 3 dBA or greater CNEL noise increase. The increase in traffic resulting from the development of the Proposed Project would increase ambient noise levels at sensitive off-site locations in the Project vicinity. Off-site locations in the Project vicinity would experience a slight increase in noise resulting from the additional traffic generated by the Proposed Project. The Proposed Project would increase local noise levels by a maximum of 0.13 dBA CNEL during the A.M. peak hour on Lucas Avenue and 6th Street, which would be inaudible/imperceptible to most people. This increase would not exceed the identified thresholds of significance. Because the increase in local noise levels at all of the analyzed intersections resulting from the development of the Proposed Project would be less than the 3 dBA, mobile noise impacts would be less than significant. In addition, as the other intersections that are located even further away from the Project Site would experience less traffic increases due to the Proposed Project, the increase in local noise levels at these intersections and roadway segments would also not exceed the identified thresholds of significance, and mobile noise impacts would be less than significant.

Parking Noise

Vehicular parking for the project would be provided in a series of at grade and subterranean parking garages. The proposed parking areas have the potential to generate noise due to cars entering and exiting the Project Site, engines accelerating, braking, car alarms, squealing tires and other general activities associated with people using the parking areas (i.e., talking, opening/closing doors, etc.) at all hours of the day and night. Noise levels within the parking areas would fluctuate with the amount of automobile and human activity. Noise levels would be highest in the early morning and evening when the largest number of people would enter and exit the Project Site. During these times, the noise levels could range from 60 to 70 dBA Leq. There would be times in the night when very little activity occurs and the noise levels average less than 50 Leq. As the subterranean parking garages would be entirely below grade and fully enclosed on all sides aside from the entrance driveway, noise generated from within the structures would not be expected to adversely affect the existing off-site receptors located near the Project Site. Furthermore, operational noise generated by motor driven vehicles within the Project Site is regulated under the LAMC Section 114.02 of the LAMC, which prohibits the operation of any motor driven vehicles upon any property within the City such that the created noise would cause the noise level on the premises of any occupied residential property to exceed the ambient noise level by more than five dBA. Thus, noise impacts associated with parking would be less than significant.

Stationary Noise Sources

As part of the Proposed Project, new mechanical equipment, HVAC units, and exhaust fans would be installed on the roof of the proposed new structures. Although the operation of this equipment would generate noise, the design of these on-site HVAC units and exhaust fans would be required to comply with the regulations under Section 112.02 of the LAMC, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than five decibels. Thus, the on-site equipment would be designed such that they would be shielded and appropriate noise muffling devices would be installed on the equipment to reduce noise levels that affect nearby

uses. In addition, nighttime noise limits would be applicable to any equipment items required to operate between the hours of 10:00 P.M. and 7:00 A.M. As the Proposed Project would be constructed in compliance with LAMC Section 112.02, impacts relating to stationary operational noise would be reduced to less than significant levels. Additionally, with implementation of Mitigation Measure H-6, all exterior windows associated with the proposed residences at the Project Site shall be constructed with double-pane glass and use exterior wall construction that provides a Sound Transmission Class of 50 or greater as defined in UBC No. 35-1, 1979 edition or any amendment thereto. As such, potential impacts related to stationary noise sources would be less than significant.

Operational Vibration

The Proposed Project would not include any stationary equipment that would result in excessive vibration levels. Groundborne vibration at the Project Site and immediate vicinity currently result from heavy-duty vehicular travel (e.g., refuse trucks and transit buses) on the nearby local roadways, and the proposed land uses at the Project Site would not result in substantial increased use of these heavy-duty vehicles. While refuse trucks would be used for the disposal of solid waste at the Project Site, these trips are already occurring within the neighborhood and only occur once a week. Delivery trucks accessing the proposed ground floor commercial uses would enter the parking structure via the alley way and 6th Street to utilize the two designated loading areas within the parking structure. Delivery and refuse service vehicles would have direct access to the alley via Lucas Avenue, exiting onto Bixel Street. Loading dock and refuse service - related activities such as truck movements/idling and loading/unloading operations generate noise levels that have a potential to adversely impact adjacent land uses during long - term Project operations. However, because the loading areas would be fully enclosed and shielded from surrounding off - site development, noise from these areas would not increase noise levels at off - site sensitive receptor locations. Furthermore, as the delivery trucks would not queue along 5th Street, Lucas Avenue, or Bixel Avenue, and would cause similar groundborne vibrations as delivery trucks currently traveling along the local roadways in the project vicinity, impacts would be less than significant. Furthermore, the number of transit buses that travel along adjacent roadways would also not substantially increase due to the Proposed Project. Thus, vibration impacts associated with operation of the Proposed Project would be less than significant.

b. Cumulative Impacts

Cumulative Roadway Traffic Noise

Cumulative mobile source noise impacts would occur primarily as a result of increased traffic on local roadways and intersections due to the Proposed Project, ambient growth, and related projects within the study area. To assess the cumulative roadway noise impacts, the Future Year (2019) traffic volumes were compared to the Existing (2015) traffic volumes at the ten study intersections evaluated in the Project Traffic Study. As concluded in the EIR, Future With Project (2019) roadway noise levels would increase by a maximum of 1.65 dBA CNEL during the P.M. peak hour at the Beaudry Avenue and 5th Street/3rd Street, which would be inaudible/imperceptible to most people. As the increase in roadway noise would not exceed the 3.0 dBA CNEL or 5.0 dBA CNEL thresholds at any of the study intersections, the noise increase would not be substantial. Therefore, the cumulative impact associated with mobile source noise would be less than significant.

Cumulative Stationary Noise

As discussed above in the Project Impacts subsection, the Proposed Project's operational noise impacts associated with the HVAC equipment would be less than significant due to noise attenuation and require compliance with the regulations under Section 112.02 of the LAMC, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than 5 dBA. The related projects would also be required to comply with the regulations under Section 112.02 of the LAMC. Further, similar to the Proposed Project, the related projects would also be required to comply with the existing noise ordinance (Ordinance No. 144,331), which prohibits unnecessary, excessive, and annoying noise. The HVAC systems within Proposed Project and the related projects could potentially result in cumulative operational noise impacts from HVAC equipment to surrounding sensitive receptors. As discussed in the Project Impacts subsection above, the Proposed Project's HVAC equipment would not increase existing ambient noise levels by 3 dBA or more at the sensitive receptors that are within 500 feet of the Project Site. With regards to the related projects, the HVAC mechanical equipment would be expected to also maintain HVAC systems noise levels below 3 dBA with compliance with regulatory compliance measures. Thus, the cumulative HVAC equipment noise from the Proposed Project and related project would not increase existing ambient noise levels by 3 dBA or more. Thus, the resulting stationary noise levels from the Proposed Project and the related projects at nearby land uses would not increase existing ambient noise levels. Therefore, cumulative impacts from HVAC equipment noise would be less than significant.

On-Site Parking Activities

With respect to cumulative noise from on-site parking activities, the Proposed Project's parking areas would be located within enclosed parking structures with parking provided at grade and below grade. Access to the residential parking areas for the North and South Buildings would be accessed from the alley. Parking for the retail uses would be accessed via a single garage entry/egress driveway on W. 6th Street. Because the parking areas are enclosed, parking lot noise would largely be contained on-site. Similar to the Proposed Project, the Bixel and Lucas Project (e.g., Related Project No 23), which is directly across from the Proposed Project on W. 6th Street, would also provide structured parking in an underground parking garage. Access to the Bixel and Lucas parking garage would be provided via one driveway on W. 6th Street, one driveway on Lucas Street, and one driveway on Bixel Street. Similar to the Proposed Project, noise levels from the Bixel and Lucas parking garage would largely be constrained on site and would not impact the surrounding neighborhood. As such, cumulative noise impacts associated with parking structures would be less than significant.

c. Project Design Features

The Proposed Project does not include any project design features associated with operational noise impacts.

d. Mitigation Measures

MM H-6: 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. Alternatively, the Applicant may retain an acoustical engineer to submit evidence, along with the application for a building permit, any alternative means of sound

insulation sufficient to mitigate interior noise levels below 45 dBA CNEL in any habitable room.

e. Findings

Changes or alterations have been required in, or incorporated into, the proposed Project that avoid or substantially lessen potential significant environmental effects on operational noise impacts as identified in Section IV.H, Noise in the EIR, to less than significant levels.

f. Rationale for Findings

No adverse impacts associated with operational noise would occur as a result of the development of the proposed Project with incorporation of Mitigation Measures H-6 as identified above and set forth in the MMP. In addition, cumulative impacts with regard to operational noise impacts would be less than significant.

g. Reference

For a complete discussion of environmental impacts with respect to operational noise, please see Section IV.H, Noise, of the Draft EIR and Section II, Corrections and Additions, of the Final EIR.

5. Public Services

A. Fire Protection

a. Project Impacts

The Proposed Project would result in a less than significant impact upon fire protection services with mitigation incorporated.

Construction

The Proposed Project has the potential to increase demands upon the Fire Department during the construction period. Implementation of Code-required measures would reduce impacts upon fire protection services to less than significant levels such that no new Fire Department facilities would need to be constructed.

Removal of the existing structures and construction of the Proposed Project would increase the potential for personal injury and fires from such sources as the operation of mechanical equipment, the use and storage of flammable fuel and construction materials, and other dangers that are inherent to the construction industry. In most cases, the implementation of "good housekeeping" procedures and compliance with mandatory OSHA regulations by the construction contractors and the work crews would minimize these hazards. Good housekeeping procedures that would be implemented during demolition and construction of the Project include: the maintenance of mechanical equipment in good operating condition; careful storage of flammable materials in appropriate containers; and the immediate and complete cleanup of spills of flammable materials when they occur.

Construction activities also have the potential to affect fire protection services, such as emergency vehicle response, by adding construction traffic to the street network and by partial lane closures

during street improvements and utility installations. The impacts, while potentially adverse, are considered to be less than significant for the following reasons: (1) Construction impacts are temporary in nature and do not cause lasting effects; and (2) Partial lane closures would not greatly affect emergency vehicles, the drivers of which normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Additionally, if there are partial closures to streets surrounding the Project Site, flagmen would be used to facilitate traffic flow until construction is complete. Moreover, as discussed in Section 6. Traffic/Transportation below, the Applicant will be required to develop a Construction Traffic Control/Management Plan prior to construction to minimize the effects of construction on vehicular and pedestrian circulation (refer to MM K-1). The Plan would be required to be submitted to LADOT for review and approval prior to the commencement of the construction period.

Furthermore, throughout the construction process, the Proposed Project would be required to maintain appropriate fire flow and access pursuant to the Los Angeles Fire Code, LAMC Sections 57.09.01 through 57.09.11. Project construction would not be expected to tax fire fighting and emergency services to the extent that there would be a need for new or expanded fire facilities, in order to maintain acceptable service ratios, emergency response, or other performance objectives of the LAFD, the construction of which could cause significant environmental impacts. Therefore, construction-related impacts to fire protection services would be less than significant.

Operational Impacts

The Proposed Project would include up to 369 dwelling units and up to 22,000 square feet of ground-floor retail and would generate up to 1,148 new residents and approximately 38 employees. , Thus, the Proposed Project is expected to increase the number of persons on the Project Site, which would potentially increase the demand for LAFD services. The following discussion analyzes the major criteria for determining the impacts of the Project to fire protection services, including response distance, emergency access/evacuation and fire flow.

Response Distance

The maximum response distance between residential land uses and a LAFD fire station that houses an Engine or Truck Company is 1.5 miles. As discussed above, the existing distances from the fire stations serving the Project Site are as follows: Fire Station 3 is located 1.0 miles from the Project Site; Fire Station 11 is located 0.9 miles from the Project Site; Fire Station 9 is located 1.5 miles from the Project Site. As such, the response distances from the Project Site to the Fire Stations meet the desired response distances and performance standards.
Further, fire sprinkler systems would be installed and any other fire protection devices deemed necessary by the Fire Chief (e.g., fire signaling systems, fire extinguishers, smoke removal systems etc.) per the City of Los Angeles Fire Code. Based on the response distance criteria specified in LAMC Section 57.507.3.3A and the relatively short distance from the Project Site to three well-equipped fire stations, fire protection response would be considered adequate with respect to response distances. Therefore, the Project would not require new or expanded fire facilities in order to maintain service, the construction of which could cause significant environmental impacts, and impacts would be less than significant.

Emergency Access

The Proposed Project would not involve activities during its operational phase that could impede public access or travel upon public right-of-way or would interfere with an adopted emergency

response or evacuation plan. Emergency vehicle access to the Project Site would continue to be provided from local public roadways. As discussed in Section 6. Traffic/Transportation, below, the Proposed Project would result in a less than significant impact with respect to traffic, emergency access, design hazards, or alternative modes of transportation that currently serve the Project area. Furthermore, the Project's overhead pedestrian connection across the alley would be provided on the third level and would meet the height clearances to ensure adequate fire equipment would have unimpeded access within the alley. This project feature would be reviewed and approved by the LAFD and the Department of Building and Safety as part of the Plan Check approval process. Overall, the Proposed Project's emergency access impacts would be less than significant.

Fire Flow

As determined by the LAFD Fire Code, the overall fire flow requirement for a high density residential and neighborhood commercial type development such as the Proposed Project is 4,000 gpm from four fire hydrants flowing simultaneously with a 20 psi minimum residual pressure. The required fire flow for the Project would be confirmed in consultation with the LAFD during the plan check approval process and is subject to change from the required fire flow in the LAMC.

The Water Operations Division of the DWP would perform a fire flow study at the time of permit review in order to ascertain whether further water system or site-specific improvements would be necessary. Hydrants, water lines, and the water tanks would be installed per Fire Code requirements and would be based upon the specific land uses of the Proposed Project. The points of connection would need to be verified at the time of connection to ensure adequate water supply and pressure existing in the proposed connection lines. The Project Applicant would be required to ensure adequate fire flows and infrastructure pursuant to the LAFD Fire Code. Therefore, with respect to fire flows, through compliance with standard regulatory processes and requirements fire protection would be adequate. Therefore, the Project would not require new or expanded fire facilities in order to maintain acceptable service, the construction of which could cause significant environmental impacts, and the Project's impact upon fire protection services would be less than significant.

b. Cumulative Impacts

The Proposed Project, in combination with the construction and operation of the 99 related projects is expected to increase the demand for fire protection services in the Project area. Specifically, there would be increased demand for additional LAFD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (e.g., property taxes, government funding, and developer fees) to which the Proposed Project and related projects would contribute.

Each related project would be required to satisfy the response distance, emergency access, and fire flow requirements pursuant to the 2014 Los Angeles Fire Code. If response distance is exceeded, each related project would be subject to LAMC Section 57.09.06, which requires the installation of automatic fire sprinkler systems. Similar to the Proposed Project, each of the related projects would be individually subject to LAFD review and would be required to comply with all applicable construction-related and operational fire safety requirements of the LAFD and the City of Los Angeles in order to adequately mitigate fire protection impacts. With respect to emergency access, the design of each related project would be evaluated individually in coordination with LADOT, LAFD and LAPD to minimize any potential impacts.

To the extent cumulative development causes the need for additional fire stations to be built throughout the City, the development of such stations would be subject to further CEQA review and evaluated on a case-by-case basis. However, based on a review of the related project list in Section III, Environmental Setting in the Draft EIR and the lack of any information indicating the development of new fire stations in the project vicinity in LAFD's Strategic Plan 2015-2017 website , the LAFD does not currently have any plans for new fire stations to be developed in proximity to the Project Site. On this basis, the Proposed Project would not make a cumulatively considerable impact to fire protection services, and, as such cumulative impacts on fire protection services would be less than significant.

c. Project Design Features

The Proposed Project does not propose any Project Design Features with respect to fire protection services.

d. Mitigation Measures

See Mitigation Measure MM K-1 in Section 6. Traffic/Transportation, below. No additional mitigation measures are required.

e. Findings

Changes or alterations have been required in, or incorporated into, the proposed Project that avoid or substantially lessen potential significant environmental effects on Fire Protection Services, as identified in the EIR, to less than significant levels.

f. Rationale for Findings

No adverse impacts associated with Fire Protection Services would occur as a result of the development of the proposed Project with incorporation of Mitigation Measure K-1 as set forth in the MMP. In addition, cumulative impacts with regard to Fire Protection Services would be less than significant.

g. Reference

For a complete discussion of environmental impacts with respect to Fire Protection Services, please see Section IV.J.1, Fire Protection Services, of the Draft EIR and Section II, Corrections and Additions, of the Final EIR.

B. Police Protection

a. Project Impacts

The Proposed Project would result in a less than significant impact upon public safety and police protection services.

Construction Impacts

Construction activities have the potential to affect emergency vehicle response by adding construction traffic to the street network and by partial lane closures during street improvements and utility installations. The impacts, while potentially adverse, would be less than significant for

the following reasons: (1) Construction impacts are temporary in nature and do not cause lasting effects; and (2) Partial lane closures would not greatly affect emergency vehicles, the drivers of which normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Additionally, if there are partial closures to streets surrounding the Project Site, flagmen would be used to facilitate traffic flow until construction is complete. Moreover, as discussed in Section IV.K., Traffic/Transportation, the Applicant will be required to develop a Construction Traffic Control/Management Plan prior to construction to minimize the effects of construction on vehicular and pedestrian circulation (refer to MM K-1). As such, impacts associated with emergency response for police services during construction would be less than significant.

When not properly secured, construction sites can attract criminal activity and adversely affect local law enforcement. The Proposed Project has the potential to adversely affect police services during the construction period due to an increased potential for trespassers, theft, and vandalism, which would potentially result in graffiti, excess trash, and potentially unsafe conditions for the public. Such occurrences would adversely affect the aesthetic character of the Project Site and surrounding area and could potentially cause public health and safety concerns. The construction of the Proposed Project would therefore present a potentially significant impact on police protection services. With implementation of Mitigation Measure J.2-1, below, impacts to police services from construction activities would be less than significant.

Operation Impacts

The Proposed Project has the potential to place additional demands upon police protection services during operation as a result of the addition of the mixed-use residential and commercial development. However, the Project includes security/design features that would reduce the demand for police services to less than significant levels.

The Proposed Project would include the construction of approximately 369 multiple residential dwelling units and approximately 22,000 square feet of retail floor area. The Proposed Project would generate up to 1,148 new residents and approximately 38 employees. While there is not a directly proportional relationship between increases in land use activity and increases in demand for police protection services, the number of calls requesting police responses to retail burglaries, vehicle burglaries, damage to vehicles, traffic related incidents of crimes against persons would be anticipated to increase with the increase in on-site activity and increase in traffic on adjacent streets and arterials. Such calls are typical of problems experienced in the existing neighborhoods, and do not represent unique law enforcement issues specific to the Proposed Project. However, any additional demands upon police protection services would be potentially significant. As a mixed-use project, the Proposed Project would provide an increased 24-hour community presence, which often has the result of reducing crime rates. The continuous presence of people and activity on-site is known to deter criminal activity as more eyes are on the street. To further reduce the potential for increased demand upon police services in the area, the Project would include strategically positioned low-level and security lighting to enhance public safety. Visually obstructed and infrequently accessed “dead zones” would be limited and, where possible, security would be controlled to limit public access. The building and layout design of the Proposed Project would also include crime prevention features, such as nighttime security lighting, full-time on-site professional security, security cameras monitored by on-site professional security, intrusion prevention systems and secure parking facilities. Furthermore, as identified under the Mitigation Measures subsection below, the Proposed Project would be required to implement safety measures as recommended by the LAPD, including consulting with the LAPD’s Crime Prevention Unit regarding the incorporation of crime prevention features identified in the

Los Angeles Police Department's Design Out Crime Guidelines. The Applicant would also submit a diagram of the Project Site to the LAPD's Rampart Commanding Officer that includes access routes and any additional information that might facilitate police response. With mitigation, the Project would not require new or expanded police facilities in order to maintain acceptable service, the construction of which could cause significant environmental impacts, and impacts related to police services would be reduced to less than significant levels.

b. Cumulative Impacts

The Proposed Project, in combination with ambient growth and the 99 related projects, would increase the demand for police protection services in the Westlake Community Plan Area. Similar to the Proposed Project, each of the related projects would be individually subject to LAPD review, and would be required to comply with all applicable safety requirements of the LAPD and the City of Los Angeles in order to address police protection services demands adequately. Impacts created by new development would be reduced by the incorporation of required security measures into each proposed development, which would revitalize the Westlake Area. Ongoing revitalization efforts would help reduce the cumulative crime impacts in the Westlake Area. Further, the continuous presence of people and activity on-site and in the Project area would deter criminal activity, as more eyes would be on the street. In addition, similar to the Project Site, the related projects would reduce blighted and underutilized sites and would be required to develop new projects with improved security design features (i.e. low level lighting, controlled access, elimination of dead spaces). The LAPD also monitors the need for police services and proposes appropriate service enhancement through the yearly budgetary process.

To the extent cumulative development causes the need for additional police stations to be built throughout the City, the development of such stations would be subject to further CEQA review and evaluated on a case-by-case basis. However, the LAPD does not currently have any plans for new police stations to be developed in proximity to the Project Site. On this basis, the Proposed Project would not make a cumulatively considerable impact to fire protection services, and, as such cumulative impacts on police protection services would be less than significant.

c. Project Design Features

The Proposed Project did not identify any Project Design Features associated with Police protection Services.

e. Mitigation Measures

MM J.2-1: Temporary construction fencing shall be placed along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to keep unpermitted persons from entering the construction area. Low-level security lighting, and locked entry (e.g., padlock gates or guard-restricted access) shall be provided to limit access by the general public. Regular security patrols during non-construction hours shall also be provided. During construction activities, the Contractor shall document the security measures; and the documentation shall be made available to the Construction Monitor.

MM J.2-2: Prior to the issuance of a building permit, the Project Applicant shall consult with the Los Angeles Police Department's Crime Prevention Unit regarding the incorporation of crime prevention features appropriate for the design of the Project, including applicable features in the Los Angeles Police Department's Design Out

Crime Guidelines. The crime prevention features recommended by the Los Angeles Police Department's Crime Prevention Unit and agreed to by the Project Applicant during consultation shall be made part of the Project.

MM J.2-3: Prior to the issuance of a certificate of occupancy, the Project Applicant shall submit a diagram of the Project Site to the Los Angeles Police Department Rampart Bureau Commanding Officer that includes access routes and any additional information that might facilitate police response.

e. Findings

Changes or alterations have been required in, or incorporated into, the proposed Project that avoid or substantially lessen potential significant environmental effects on Police Protection Services, as identified in the EIR, to less than significant levels.

f. Rationale for Findings

No adverse impacts associated with Police Protection Services would occur as a result of the development of the proposed Project with incorporation of Mitigation Measures J.2-1, J.2-2, J.2-3, and K-1 as set forth in the MMP. In addition, cumulative impacts with regard to Police Protection Services would be less than significant.

g. Reference

For a complete discussion of environmental impacts with respect to Police Protection Services, please see Section IV.J.2, Police Protection Services, of the Draft EIR and Section II, Corrections and Additions, of the Final EIR.

6. Traffic/Transportation

a. Project Impacts

The Proposed Project would not 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. The Project would result in a less than significant impact with mitigation.

Construction Impacts

It is not anticipated that complete closures of any streets would be required during the construction of the Proposed Project. Construction activities could, however, result in partial lane closures on streets adjacent to the Project Site on a temporary and/or intermittent basis for utility relocations and hook-ups, delivery of materials, and other construction activities, as may be required. While site deliveries and staging of all equipment and materials would be organized in the most efficient manner possible and on-site where possible to avoid an impact to the neighborhood and surrounding traffic, it is expected that, at most, one traffic or parking lane adjacent to the curb may need to be closed at certain locations for certain periods of time. Any traffic lane or sidewalk closures would need to be coordinated with and approved by LADOT prior to being implemented. A construction work site traffic control plan would be submitted to LADOT for review and approval

prior to the start of any construction work. The construction work site traffic control plan would 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. See to Mitigation MeasuresK.1-1 through K.1-7, below. Because partial lane closures would be temporary in nature, and would not require long-term complete closures of any adjacent roadway, such impacts would be considered less than significant.

As part of the Project, all buildings and structures on-site would be demolished. Construction of the Proposed Project would require the export of approximately 12,893 tons of demolition and construction debris and approximately 99,151 cubic yards of soil for the construction of the subterranean parking garages. All construction and demolition debris would be recycled to the maximum extent feasible. Demolition debris and soil materials from the Project Site that cannot be recycled or diverted would be hauled to the Sunshine Canyon or Chiquita Canyon landfills, which accept construction and demolition debris and inert waste from areas within the City of Los Angeles. Demolition debris that can be recycled would be hauled to the Waste Management Downtown Diversion Center.

The Proposed Project would require the use of haul trucks during site clearing and excavation and the use of a variety of other construction vehicles such as excavators, loader trucks, aerial lifts, and utility equipment, throughout the construction of the Proposed Project. The addition of these vehicles onto the street system would contribute to increased traffic in the Project vicinity. The haul trucks would travel along established traffic corridors. Haul trips to and from the Project Site would utilize 5th Street and 6th Street to and from Interstate I-110, located to the east of the Project Site. The haul trips would occur outside of the peak hours and during the permissible hauling hours identified in the haul route to be approved by the Department of Building and Safety. The Proposed Project's construction trip traffic would be a fraction of the Project area's existing traffic (which is 2,159 daily trips, 160 AM peak hour trips, and 187 peak hour trips). The Proposed Project's construction traffic would not cause any significant impacts at the studied intersections. Additionally, pursuant to MM K-2 the Proposed Project's construction traffic would be limited to off-peak hours. Therefore, it is not anticipated that construction traffic could contribute to a significant increase in the overall congestion in the Project vicinity. In addition, any truck trips would be limited to the length of time required for the Proposed Project's construction.

It is anticipated that the excavation and soil export would involve 18-wheel bottom-dump trucks with an average of 12 cubic yard hauling capacity (i.e., 30 tons maximum gross weight). All truck staging would either occur on-site or at designated off-site locations and radioed into the site to be filled. The local haul route to and from the 110 Freeway east of the Project Site would utilize W. 6th Street and 5th Street as a direct route. The haul route specified above may be modified in compliance with City policies, provided LADOT and/or Street Services approves any such modification. Hauling activities for demolition and excavation would occur from 9:00 A.M. to 4:00 P.M. Monday through Saturday. Temporary impacts to the surrounding neighborhood could be anticipated during the hauling phases as a result of trucks staging, idling excessively and traveling on area roadways. The Proposed Project's construction activities, including hauling would be subject to the City of Los Angeles standard conditions that would minimize any potentially adverse impacts upon the neighborhood. With implementation of Mitigation Measures K-1 and K-2, temporary impacts from hauling activities would be considered less than significant.

Further, construction of the Proposed Project may generate additional vehicles trips on surrounding streets due to construction workers arriving at the Project Site on a daily basis. All construction workers will be required to park on site or within a designated off-street parking lot as specified in the Construction Management Plan. The volume of construction personnel driving

to and from the site on a daily basis is anticipated to be less than the Project's anticipated operation daily traffic. The impact of construction worker trips on the surrounding roadways and intersections during the A.M. and P.M. peak hours is therefore expected to be negligible. Traffic impacts from construction worker trips would therefore be less than significant.

Project Trip Generation

The latest version of the Institute of Transportation Engineers (ITE) Trip Generation Manual (9th Edition, 2012) was used to develop the traffic characteristics of the Proposed Project. The trip generation equations and rates in the ITE manual are nationally recognized and are used as the basis for most traffic impact studies conducted in the City of Los Angeles and surrounding region. Information was obtained from the Trip Generation Manual for ITE Land Use Code (LUC) 220 – Apartment, LUC 710 – General Office Building, LUC 720 – Medical-Dental Office Building, LUC 820 – Shopping Center, LUC 931 – Quality Restaurant, and LUC 936 – Coffee/Donut Shop without Drive-Through Window. Pursuant to LADOT policies for calculating trip generation rates/equations and appropriate trip reduction factors for existing uses, walk in trips, and pass by trips, the Proposed Project is estimated to generate approximately 1,278 net trips per day, with 100 trips during the AM peak hour and 98 trips during the PM peak hour, would access the Project driveways. These net traffic volumes were used to estimate Project traffic impacts at the site-adjacent study intersections of Lucas Avenue and 6th Street and Bixel Street and 6th Street.

Existing (2015) with Project Traffic Conditions

Based on the December 16, 2010 decision of the California Sixth District Court of Appeal in the Sunnyvale West Neighborhood Association v. City of Sunnyvale City Council case, an additional traffic impact analysis has been performed for the Project. In the Sunnyvale case, the Court of Appeal found, based on the facts of that case, the impacts of a project must be compared "against current, existing physical conditions." While the facts of the Sunnyvale case may be distinguishable from this case, in the interest of fullest disclosure an analysis of Existing (2015) Plus Project AM and PM peak-hour conditions was performed.

The Existing (2015) Plus Project traffic volumes were determined by superimposing the Project-only traffic volumes onto the Existing (2015) traffic volumes. The analysis of Existing (2015) Plus Project traffic conditions at the study intersections indicates that for the AM and PM peak hours, the addition of Proposed Project traffic would not create a significant impact at any of the study intersections, and any increases in critical movement analysis (CMA) would be less than the threshold for a significant impact to occur. The level of service for all intersections would operate at the same level of service with the addition of Project traffic. The addition of Project traffic would not create a significant impact during the AM or PM peak hours. Further, the Project includes project design features (discussed below) to further ensure the safety and accessibility of the Project Site.

Future (2019) with Project Traffic Conditions

Project traffic volumes, as determined earlier, were then added to the Future (2019) Without Project traffic volumes to develop the Future (2019) With Project volumes. The Future (2019) With Project volumes were then used to determine traffic impacts directly attributable to the Project. Under Future (2019) With Project conditions, the addition of Project-related traffic would reduce the LOS at two study intersections, each during one peak hour. Under Future (2019) With Project conditions, six study intersections would continue to operate at LOS C or better during both peak

hours, three study intersections would operate at LOS D during one of the peak hours, and one study intersection would operate at LOS D during both peak hours.

For the AM and PM peak hours, the addition of Proposed Project traffic would not create a significant impact at any of the study intersections, and any increases in critical movement analysis (CMA) would be less than the threshold for a significant impact to occur. All ten study intersections would continue operating at the same LOS during both peak hours with the addition of Project traffic, except for the intersections of Bixel Street an Wilshire Boulevard (intersection 5) and Bixel Street and 7th Street (intersection 6). For the PM peak hour, the addition of Project traffic would change the level of service from a LOS C to a LOS D at the intersections Bixel Street and Wilshire Boulevard and Bixel Street and 7th Street. Nevertheless, the addition of Proposed Project traffic would not reach the threshold for a significant impact to occur and would not create a significant impact during the PM peak hour. Further, the Project proposes project design features to further ensure the safety and accessibility of the Project Site.

Residential Street / Neighborhood Intrusion Impact Analysis

In order to address local residential neighborhood concerns, the LADOT requires the preparation of a residential street impact analysis if a development project meets certain conditions. These conditions include the proposed development project being non-residential and non-school in nature, with an anticipated significant traffic contribution to a congested arterial (with intersections operating at LOS E or F) in the presence of local residential street(s) that provide viable alternate route(s). The Project is primarily residential in nature, but it does contain approximately 22,000 square feet of commercial uses. However, the nearby arterials expected to experience the greatest Project traffic volume contributions are all expected to operate at LOS D or better during both peak hours under Future (2019) traffic conditions. Therefore, the Project is not expected to significantly impact local residential streets and no further analysis is required.

Congestion Management Program (CMP) Impact Analysis

The traffic impact guidelines of the current 2010 Congestion Management Program (CMP) for Los Angeles County require analysis of all CMP arterial monitoring locations where a project could add a total of 50 or more trips during either peak hour. Additionally, all freeway monitoring locations where a project could add 150 or more trips in either direction during the peak hours are to be analyzed.

The nearest CMP arterial monitoring locations to the Project Site are the intersection of Wilshire Boulevard and Alvarado Street (~0.75 miles west of the Project Site) and the intersection of Alvarado Street and Sunset Boulevard (~1.5 miles north). Based on a review of the Project trip generation and the Project trip distribution patterns, the Proposed Project is expected to contribute minimal traffic volumes to these CMP monitoring intersections during the weekday AM and PM peak hours. Further, it is expected that Project traffic volume contributions to more distant CMP arterial monitoring locations would be even lower, given that Project traffic would disperse across an increasing number of roadways when further from the Project Site. With Project traffic contributions well below the 50-trip threshold, no significant Project impacts to CMP arterial monitoring locations are forecast and no additional arterial intersection analysis is necessary.

In terms of CMP freeway monitoring segment analysis, a review of the Project's trip generation indicates that the Project would not generate more than 117 net directional (inbound or outbound) trips during either peak hour. Therefore, the Project would contribute well below the 150 directional-trip threshold to all CMP freeway monitoring segments, no significant Project impacts

to CMP freeway monitoring locations are forecast, and no additional freeway analysis is necessary.

The local CMP also requires that all projects consider potential transit impacts. The Project trip generation reflects a transit adjustment of 15 percent for all land uses, which amounts to 266 net daily transit trips, with 18 AM peak-hour and 17 PM peak-hour transit trips. Per the 2010 CMP guidelines, person transit trips can be estimated by multiplying the transit vehicle trip reductions by a conversion factor of 1.4. Therefore, the number of Project person transit trips would be approximately 316 daily person transit trips, with 25 AM peak-hour and 24 PM peak-hour person transit trips. Based on recent ridership information provided by the Metro and LADOT, many of the bus and rail lines operating in the Project study area experience ridership levels well below capacity during the AM and PM peak hours. With a combined five transit operators operating 18 different bus routes within a convenient walking distance of the Project Site, the local transit system offers substantial available ridership capacity. Therefore, it is expected that the incremental additions of Project person transit trips would not have a significant impact on transit service in the study area.

Caltrans Freeway Impact Analysis

As shown in the Traffic Study MOU (dated November 10, 2014 and approved by the LADOT on November 21, 2014) included in Appendix F of the Traffic Study, a Caltrans freeway impact analysis screening was performed in order to determine if freeway mainline or off-ramp analyses would be required of the Project. As indicated, the Project is not anticipated to contribute sufficient traffic volumes to warrant detailed freeway mainline or off-ramp analyses. It should be noted that the Project description has changed since the preparation and approval of the Traffic Study MOU, and the current Project would have lower net trip generation estimates than the description analyzed in the MOU. Therefore, the conclusions of the MOU would remain the same, and no detailed freeway analysis is warranted.

9. Driveway Access and Circulation

The Project would not substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). As such, the Project's potential impacts upon driveway access and circulation would be less than significant.

The Proposed Project would provide on-site parking in two subterranean parking garages located under the two proposed buildings and partially at grade interior to both buildings. The Proposed Project would include three driveway access points to on-site parking. Access to the residential parking would be provided via the east-west alley that runs parallel to and between 5th and 6th Streets, with one driveway supplied for each of the buildings. Access to parking for the retail/restaurant uses in the South Building would be provided via one driveway that would intersect the north side of 6th Street, between Lucas Avenue and Bixel Street.

As part of the Project, the two-way, east-west alley that divides the northern and southern portion of the Project Site is proposed to be limited to one-way (westbound) operations until the alley's full 20-foot width is dedicated along the entire segment between Lucas Avenue and Bixel Street.

According to the LADOT's correspondence letter (Case No. CEN 15-43947, dated March 3, 2016), the conceptual site plan for the Proposed Project is acceptable to LADOT. However, the review of the Traffic Study does not constitute approval of the driveway dimensions, access and circulation scheme. Those require separate review and approval and would be coordinated with

LADOT's Citywide Planning Coordination Section. New driveways would be Case 2-designed with a recommended width of 30 feet for two-way operations. Delivery truck loading and unloading should take place on site with no vehicles having to back into the Project Site via the Proposed Project driveway. With implementation of LADOT's standard conditions as specific in their communication to the Planning Department (DOT Case No. CEN 15-43947, dated March 3, 2016) and mitigation measures identified below, the Proposed Project shall comply with the requirements listed in the correspondence letter with LADOT, and temporary impacts with respect to design features shall be considered less than significant.

The Proposed Project would provide required parking, pursuant to the LAMC Section 12.21.A4(p), within two levels of subterranean parking. Additionally, the Proposed Project is located within a Transit Priority Area, pursuant to SB 743, which exempts parking impacts from being considered significant impacts on the environment. The Proposed Project would one new driveway on the north side of W. 6th Street. The remaining driveways would be located off of the existing alleyway. As such, the Proposed Projects minimizes the amount of curb cuts onto public right of ways. This enhances on-site parking and pedestrian mobility. The design and construction of the Project driveways would occur in consultation with LADOT and the Department of Building and Safety. With the incorporation of Mitigation Measure MM K-3, operational driveway design impacts would be less than significant.

Emergency Access

The Proposed Project would result in a less than significant impact with respect to inadequate emergency access.

The Proposed Project is not located on or near an adopted emergency response or evacuation plan. Development of the Project Site may require temporary and/or partial street closures due to construction activities. However, any such closures would be temporary in nature and would be coordinated with the Departments of Transportation, Building and Safety, and Public Works. Nonetheless, while such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans. Furthermore, the Project contractor will be required to prepare and implement a Construction Traffic Control/Management Plan to be approved by LADOT to minimize the effects of construction on vehicular and pedestrian circulation and assist in the orderly flow of vehicular and pedestrian circulation in the area of the Project (see MM K-1, below). Additionally, mitigation measures MM K-2 through MM K-7 propose additional construction control measures to further minimize the Project's potential for construction impacts. Therefore, the Proposed Project would not cause permanent alterations to vehicular circulation routes and patterns, or impede public access or travel upon public rights-of-way.

The Proposed Project would satisfy the emergency response requirements of the LAFD. There are no hazardous design features included in the access design or site plan for the Proposed Project that could impede emergency access. Furthermore, the Proposed Project would be subject to the site plan review requirements of the LAFD and the LAPD to ensure that all access roads, driveways and parking areas would remain accessible to emergency service vehicles. Therefore, the Proposed Project would not be expected to result in inadequate emergency access, and a less than significant impact would occur.

Transit Plans and Policies

The Proposed Project would not conflict with adopted policies, plans, or programs regarding public transit, bicycles, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities, and a less than significant impact would occur.

The Proposed Project would not require the disruption of public transportation services or the alteration of public transportation routes. Furthermore, the Proposed Project would not interfere with any existing class I or class II bikeway systems. Since the Proposed Project would not modify or conflict with any alternative transportation policies, plans or programs, the Proposed Project would have a less than significant impact on such programs.

b. Cumulative Impacts

Construction Impacts

The Proposed Project would result in a less than significant impact in regards to roadway closures and construction traffic. Construction of the Proposed Project and related projects are expected to occur on different times and follow different development schedules. Each development project is dispersed throughout the greater Project area, and each project would follow a haul route to access the freeway in the most efficient manner possible for their respective project site. Further, any temporary road closures or roadway changes caused by any development project is subject to the review and approval of LADOT. The Bixel and Lucas Project (Related Project No. 23), located at 1102 W. 6th Street, is the closest related project to the Project Site. Development of the Bixel and Lucas Project is currently underway and is expected to be nearing completion or operation by the time construction of the Proposed Project would start. As such, development of the Proposed Project and related projects are not expected to cumulatively contribute to increased construction traffic or roadway closures.

Operation Impacts

The Traffic Study identified 99 related projects. The Traffic Study analyzed cumulative conditions based on the construction of the 99 related projects. An additional one percent per year growth rate was added to determine future conditions. A list of proposed related projects that could affect traffic conditions in the Project area was prepared based on information obtained from a variety of sources including the City of Los Angeles Department of Transportation, other studies and reports and field observations. These related projects are in different stages of the approval/entitlement process, ranging from projects that are under construction to projects that have been approved but not constructed, to projects that are currently proceeding through the planning process. It should be noted that some of the cumulative projects may in fact not be built by the time horizon of the Proposed Project, or at all. The future baseline forecast is thus a conservative (worst case) forecast.

Development of the Proposed Project in conjunction with the 99 related projects identified in Section III, Environmental Setting, would increase the amount of traffic in the Central City West Specific Plan area and the Westlake Community Plan area. The cumulative traffic impacts were addressed in the analysis presented above by comparing the Existing Condition as presented in the "Environmental Setting" portion of this Section, to the Future With Project (which includes the Proposed Project plus ambient growth and related project growth), as presented in the "Project Impacts" portion of this Section. As discussed under "Project Impacts" under the Future With Project for the A.M. peak hour and P.M. peak hour, the addition of Project traffic would not result in a significant traffic impact at any of the ten analyzed intersections. The Project would not result in a significant impact with respect to CMP intersections.

With respect to Traffic from each of the related projects, mitigation measures for each related project would be implemented individually in coordination with LADOT. The Proposed Project would result in a less than significant with respect to traffic, circulation, or alternative modes of transportation that currently serve the Project area. With respect to each of these areas, the design of each related project would be evaluated individually in coordination with LADOT, LAFD and LAPD to minimize any potential impacts. Overall, the Proposed Project's cumulative transportation and traffic impact would be less than significant.

c. Project Design Features

The Proposed Project proposes the following Project Design Feature related to traffic/transportation.

PDF K-1 The Applicant shall contact Los Angeles County Metropolitan Transportation Authority (LACMTA) Bus Operations Control Special Events Coordinator at 213-922-4632 regarding construction activities that may impact LACMTA bus lines at least 30 days in advance of initiating construction activities. For closures that last more than six months, LACMTA's Stops and Zones Department will also need to be notified at 213-922-5188, 30 days in advance of initiating construction activities. Other municipal bus operators that may be impacted (including DASH, Foothill Transit, Montebello Bus Lines, and the Orange County Transportation Authority) shall be included in construction outreach efforts.

d. Mitigation Measures

MM K-1 The Applicant shall, prior to construction, develop a Construction Traffic Control/Management Plan (the "Plan") to be approved by LADOT to minimize the effects of construction on vehicular and pedestrian circulation and assist in the orderly flow of vehicular and pedestrian circulation in the area of the Project. The Plan shall include temporary roadway striping and signage for traffic flow as necessary, as well as the identification and signage of alternative pedestrian routes in the immediate vicinity of the Project.

MM K-2 A Construction work site traffic control plan shall be submitted to LADOT for review and approval in accordance with the LAMC prior to the start of any construction work. The plans shall 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. All construction related traffic shall be restricted to off-peak hours (i.e., between the hours of 9:00 a.m. and 4:00 p.m.).

MM K-3 The Applicant shall install traffic signs in accordance with the LAMC around the Project Site to ensure pedestrian and vehicular safety.

MM K-4 The Applicant shall plan construction and construction staging as to maintain pedestrian access on adjacent sidewalks throughout all construction phases. This requires the applicant to maintain adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding, etc) from work space and vehicular traffic and overhead protection, due to sidewalk closure or blockage, at all times.

MM K-5 Temporary pedestrian facilities shall be adjacent to the project site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility.

MM K-6 Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects.

MM K-7 Pursuant to LAMC Section 62.45, permits shall be obtained from the Bureau of Street Services prior to the closure of any adjacent sidewalks and/or construction of protection fences or canopies within the public right-of-way. For purposes of ensuring safe pedestrian routes are maintained during construction, the following safety measures shall be adhered to:

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

e. Findings

Changes or alterations have been required in, or incorporated into, the proposed Project that avoid or substantially lessen potential significant environmental effects on Traffic/Transportation, as identified in the EIR, to less than significant levels.

f. Rationale for Findings

No adverse impacts associated with Traffic/Transportation would occur as a result of the development of the proposed Project with incorporation of Mitigation Measures K-1 through K-7 as identified above and set forth in the MMP. In addition, cumulative impacts with regard to Traffic/Transportation would be less than significant.

g. Reference

For a complete discussion of environmental impacts with respect to Traffic/Transportation, please see Section IV.K., Traffic/Transportation of the Draft EIR and Section II, Corrections and Additions, of the Final EIR.

H. SIGNIFICANT IMPACTS WHICH REMAIN SIGNIFICANT AFTER MITIGATION MEASURES

The Project would result in the following impacts, which are found to be significant and unavoidable even after the incorporation of all feasible mitigation measures:

1. Cultural Resources (Historic)

a. Project Impacts

The Proposed Project would result in the demolition of two historic resources located at 1111 and 1125 West 6th Street, the demolition of which would be considered a significant and unavoidable impact.

SurveyLA recommended 1111 West 6th Street as eligible for individual listing in the National Register (State Historical Resource Status Code 3S), eligible for individual listing in the California Register (CHR status code 3CS), and eligible for designation as a City HCM (CHR status code 5S3), citing it as an excellent example of Late Moderne commercial architecture in Westlake by the noted architectural firm of Kistner, Wright and Wright (Criterion C/3/3). Similarly, SurveyLA recommended 1125 West 6th Street as eligible for the California Register (CHR status code 5CS) and for local HCM designation (5S3) but noted that, due to the alterations to the one-story projecting volume on the primary façade, the building did not retain sufficient integrity to be eligible for the National Register. SurveyLA only records resources that have been identified as significant within the contexts developed for SurveyLA; 1330 West 5th Street was not recorded and was therefore not identified as significant. No historic districts were identified that included or were in proximity to the Project Site.

Based on the findings of the Historic Resources Technical Report, Sapphire Project, 1111 and 1125 West 6th Street, 1330 West 5th Street, Los Angeles, prepared by Leslie Heumann, dated July 12, 2016 (and included as Appendix E.1 to the Draft EIR) and the evaluation instructions and classification system prescribed by the OHP in its Instructions for Recording Historical Resources which provide a three-digit evaluation rating code for use in classifying potential historic resources, the buildings located at 1111 and 1125 West 6th Street appear to satisfy criterion C/3/3 and are therefore considered historical resources for the purposes of CEQA. 1330 West 5th Street does not appear to satisfy any criteria of significance and is therefore not a historical resource for the purposes of CEQA.

The demolition of the historic resources at 1111 and 1125 West 6th Street would result in a substantial adverse change in the significance of both resources, and therefore would cause a substantial adverse impact on the environment. Projects that may cause a substantial adverse change in the significance of a historical resource require consideration of measures to mitigate, to the extent feasible, those adverse impacts.

The Proposed Project would implement Mitigation Measure MM C-1 to ensure the recordation of the two existing commercial office and medical office buildings on-site. Prior to demolition, the City shall ensure that 1111 and 1125 West 6th Street, which are historical resources as defined by CEQA, are recorded according to the most recent guidelines of the Historic American Buildings Survey (HABS) for Level II documentation. Notwithstanding implementation of Mitigation Measure MM C-1, the demolition of the buildings located at 1111 and 1125 West 6th Street would remain a significant and unavoidable impact.

b. Cumulative Impacts

The Proposed Project, in combination with the construction and operation of the 99 related projects would result in the continued redevelopment of the surrounding area. Implementation of the Proposed Project, in combination with past, present, and potential future cumulative development in the area, could continue to alter the historic character of the Westlake Community Plan Area. Therefore, cumulative development could result in impacts to designated and potential historic resources. Although impacts to historic resources tend to be site-specific, a cumulative impact analysis of historic resources determines whether the impacts of a project and the related projects in the surrounding area, when taken as a whole, would substantially diminish the number of historic resources within the same or similar context or property type. Specifically, cumulative impacts would occur if the Project and related projects affect local resources with the same level or type of designation or evaluation, affect other structures located within the same historic district, or involve resources that are significant within the same context. As discussed above, the Project would require demolition of the historic resources on site. These impacts cannot be mitigated to less-than-significant level. Thus, to the extent that other nearby related projects also impact historic properties with the same level or type of designation or evaluation, or involve resources that are significant within the same context of the properties to be demolished, such impacts may be cumulatively considerable. Therefore, with regards to historic resources, the Proposed Project would make a cumulatively considerable contribution to cumulative historic impacts, and the cumulative impact would be significant and unavoidable.

c. Project Design Features

The Proposed Project does not identify or propose any Project Design Features related to cultural historic resources.

d. Mitigation Measures

MM C-1 Recordation. Prior to any demolition, the City shall ensure that 1111 and 1125 West 6th Street, which are historical resources as defined by CEQA, are recorded according to the most recent guidelines of the Historic American Buildings Survey (HABS) for Level II documentation. The documentation package shall include existing drawings; written history, including historic context and statement of significance; written architectural description; bibliographic materials; large-format, black-and-white photographs; and relevant related information. The original documentation shall be submitted to the HABS office in Washington, D.C., for deposit in the Library of Congress. Copies of the documentation package shall be offered to the Special Collections at the University of California Santa Barbara for addition to their Kistner, Wright and Wright archives; Los Angeles Public Library, and the South Central Coastal Information Center at California State University, Fullerton. An individual or team meeting the Secretary of the Interior's Professional Qualifications Standards (36 CFR Part 61) shall be retained to prepare the HABS materials.

e. Findings

The Proposed Project would result in unavoidable significant impacts to cultural historic resources on a project specific and cumulative level. Implementation of Mitigation Measure MM C-1 would lessen adverse impacts to historical resources but would not reduce those impacts to a less than significant level, and impacts to historical resources would remain significant and unavoidable. Specific economic, legal, social, technological or other considerations make infeasible additional mitigation measures or project alternatives identified in the EIR.

f. Rationale for Findings

Avoidance of adverse impacts is the preferred method of mitigation for addressing impacts upon historic resources. Use of the Secretary of the Interior's Standards for Rehabilitation is one means of achieving this goal. However, the Proposed Project will require demolition of the historic resources on site and avoidance and/or compliance with the Secretary of the Interior's Standards for Rehabilitation is not feasible.

g. Reference

For a complete discussion of environmental impacts with respect to Cultural Historic Resources, please see Section IV.C, Cultural Resources of the Draft EIR and Section II, Corrections and Additions, of the Final EIR.

2. Noise (Construction Noise and Groundborne Vibration Impacts)

a. Project Impacts

Construction activities are expected to generate intermittent noise levels in excess of 10 dBA on any one day or more than 5 dBA lasting more than 10 days during the construction process, which would be considered a significant but temporary impact upon nearby noise sensitive properties. During the construction period, the Proposed Project would have the potential to expose persons to noise levels in excess of established noise standards. Thus, construction noise impacts would be significant and unavoidable after mitigation.

Construction of the Project would require the use of heavy equipment for the demolition of the existing on-site structures, grading/excavation, installation of new utilities, and building fabrication for the proposed development. Development activities would also involve the use of smaller power tools, generators, and other sources of noise. During each stage of development, a different mix of equipment would be operating and noise levels would vary based on the amount of equipment in operation and the location of the activity.

The U.S. EPA has compiled data regarding the noise generating characteristics of specific types of construction equipment and typical construction activities. Based on composite noise levels associated with typical construction activities, construction noise during the heavier initial periods of construction are estimated to be 86 dBA Leq when measured at a reference distance of 50 feet from the center of construction activity. These noise levels would diminish notably with distance from the construction site at a rate of 6 dBA per doubling of distance (noise from stationary or point sources is reduced by about 6 dBA for every doubling of distance at acoustically hard locations). Due to the use of construction equipment, surrounding land uses would be exposed to increased noise levels during Project construction. The noise-sensitive land uses surrounding the Project Site are predominately residential, educational, and medical and are identified in Figure IV.H-1 of the Draft EIR. Outdoor noise levels at land uses would likely be exceeded by 5 dBA or more on a temporary and intermittent basis for four of the sensitive receptors, the residential land uses along 5th Street, the Para Los Niños Primary School, Para Los Niños Services, and potentially the future residents of the Lucas and Bixel project site on 6th Street. These noise levels would represent short-term, but substantial, noise level increases compared to the existing noise level range of 63.5 to 74.6 dBA Leq. The increase in outdoor noise levels at the off-site locations during construction would be temporary in nature and would only occur periodically, not

continuously throughout the construction day. Additionally, while the estimated outdoor construction noise levels at the off-site locations would be loudest while construction activities are occurring at areas within the Project Site closest to the off-site location, the majority of the time noise levels at off-site locations would be reduced as construction activities conclude or move to other distant areas within the Project Site. Thus, the highest noise levels that would be experienced by the off-site receptors would only occur only for a limited duration during construction of the Proposed Project.

Based on criteria set forth in the L.A. CEQA Thresholds Guide, construction activities lasting more than one day that would increase ambient exterior noise levels by 10 dBA or more at a noise-sensitive use, or construction activities lasting more than 10 days in a three-month period, which would increase ambient exterior noise levels by 5 dBA or more at a noise sensitive use, would normally result in a significant impact. Since construction activities associated with the proposed development at the Project Site would last for more than ten days in a three-month period, the Proposed Project would cause a significant noise impact during construction if the ambient exterior noise levels at the identified off-site and on-site sensitive receptors would be increased by 5 dBA or more. The ambient exterior noise levels at the identified off-site sensitive receptors would likely be exceeded by 5 dBA or more on a temporary and intermittent basis during the construction period for four of the sensitive receptors. Thus, based on criteria established in the L.A. CEQA Threshold Guide, a substantial temporary or periodic increase in ambient noise levels would occur at the identified off-site sensitive receptors. Therefore, the Proposed Project would expose persons to noise levels in excess of established standards during the construction period. The City of Los Angeles Building Regulations Ordinance No. 178,048 requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the Site, and City telephone numbers where violations can be reported. The notice is required to be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public. Pursuant to LAMC Section 41.40, exterior demolition and construction activities that generate noise are prohibited between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, and between 6:00 P.M. and 8:00 A.M. on Saturday. Demolition and construction are prohibited on Sundays and all federal holidays. The construction activities associated with the Proposed Project would comply with these LAMC requirements. In accordance with LAMC Section 112.05, construction noise levels are exempt from the 75 dBA noise threshold if all technically feasible noise attenuation measures are implemented. The estimated construction-related noise levels associated with the Proposed Project would exceed the numerical noise threshold of 75 dBA at 50 feet from the noise source, as outlined in the City Noise Ordinance, and the typical construction noise levels associated with the Proposed Project would exceed the existing ambient noise levels at all of the identified off-site sensitive receptors by more than the 5 dBA threshold established by the L.A. CEQA Thresholds Guide during all construction phases. Implementation of Mitigation Measures MM H-1 through MM H-5 would reduce the noise levels and minimize disturbances to surrounding land uses associated with construction of the Proposed Project to the maximum extent that is technically feasible. Nevertheless, temporary construction-related noise impacts would be considered significant and unavoidable.

Off-Site Construction Traffic Noise

Off-site construction traffic would increase noise levels along local roadways and impacts noise sensitive land uses in the Project Area. However, increases to ambient noise levels at sensitive receptors along the haul route would not exceed 5 dBALeq or more due to construction–related

traffic. Because noise levels would not exceed the established thresholds, construction traffic noise impacts would be less than significant.

The Proposed Project would require approximately 99,151 cubic yards of soil to be hauled off-site in order to build the subterranean parking garages. For purposes of analyzing the construction-related impacts, it is anticipated that the excavation and soil export would involve 9,804 haul trips (including inbound and outbound trips). Based on an approximate 4-month grading schedule, this would result in approximately 111 haul trips per day. The local haul route to and from the Harbor (I-110) Freeway would likely utilize 6th Street, which is designated as an Avenue II roadway; Figueroa Street, which is designated as a Boulevard II roadway; Wilshire Boulevard, which is designated as an Avenue II roadway; Bixel Street, which is designated as a Modified Avenue II roadway; and 5th Street, which is designated as a Collector Street. The ambient noise levels along W. 6th Street currently ranges from 73.5 dBA Leq to 74.6 dBALeq. The intersection of 6th Street and Bixel Street has an average daily volume of 21,914 vehicles with approximately 13,410 trips occurring within the a.m. and p.m. peak hours. Based on the TNM Reference Energy Mean Emission Levels (REMELs), one heavy truck traveling at 35 mph makes as much noise as approximately 19.1 autos cruising at the same speed. Thus, the 111 haul trips would generate an equivalent noise level generated by 2,120 automobiles, representing approximately 16 percent of the total volume of traffic along 6th Street during the a.m. and p.m. peak hours and less than 10 percent of the total average daily traffic volume. Based on the fundamental principles of traffic noise it takes a doubling of traffic to increase noise by 3 dBA. Thus, because the volume of automobile equivalent noise generated by the estimated number of daily haul trips expected to be generated by the Project would not double the existing traffic volume along the haul route, the Project's haul truck noise levels would not exceed the 5 dbA threshold. Additionally, all construction activities for the Modified Project would occur between the hours of 7:00 a.m. to 6:00 p.m. Monday through Friday and 8:00 a.m. to 6:00 p.m. on Saturdays. As such, noise impacts from haul truck noise to off-site land uses would be less than significant.

Construction Vibration Impacts

Construction activities would generate groundborne vibration impacts on a temporary and intermittent basis during construction. The Proposed Project's potential to result in structural damage due to construction generated groundborne vibration is below the FTA and Caltrans adopted vibration standards for building damage and would therefore be considered less than significant. Construction activities would exceed the groundborne vibration thresholds of significance for vibration annoyance at Sensitive Receptor No. 6 (Para Los Niños Services) and would be significant and unavoidable after mitigation.

Construction activities that would occur within the Project Site would have the potential to generate low levels of groundborne vibration. Based on the information presented in Table IV.H-10 in the EIR, vibration velocities could reach as high as approximately 0.089 inches per second PPV at 25 feet from the source activity, depending on the type of construction equipment in use. This corresponds to a RMS velocity level (in VdB) of 87 VdB at 25 feet from the source activity.

Although the construction noise mitigation measures MM H-1 through MM H-5 and adherence to the regulatory compliance measures discussed above would reduce construction related vibration levels to the maximum extent feasible, intermittent construction activities are unpredictable and are likely to exceed the stated annoyance thresholds on a temporary and infrequent basis during the project's construction period. As such, human annoyance impacts with respect to construction-generated vibration increases would be considered significant.

The City of Los Angeles has not adopted any policies or guidelines relative to construction-induced groundborne vibration impacts on buildings. While the Los Angeles County Code (LACC Section 12.08.350) states a presumed perception threshold of 0.01 inch per second RMS, this threshold applies to groundborne vibrations from long-term operational activities, not construction. Consequently, as both the City of Los Angeles and the County of Los Angeles do not have a significance threshold to assess vibration impacts during construction, the FTA has adopted vibration standards for buildings which are used to evaluate potential impacts related to project construction. According to thresholds determined by FTA, project construction activities would cause a PPV ground-borne vibration level to exceed 0.12 inches per second at any historical building or building that is extremely susceptible to vibration damage. SurveyLA identifies six potentially historic buildings in close proximity, with four of the identified potentially historic buildings within 500 feet of the Project Site. It is estimated that construction vibration would not exceed the threshold of 0.12 inches per second during the construction period.

With respect to non-historic buildings that are adjacent to the Project Site, there are three structures in close proximity to the Project Site that would have the potential be exposed to vibration impacts during construction. The structures located at 1137-1141 W. 6th Street and 1346 W. 5th Street are located directly adjacent to the Project Site with no building setback. The building located at 507 S. Bixel Street is approximately 45 feet to the north of the Project's South Block and approximately 100 feet east of the Project's North Block. The Proposed Project would include subterranean parking levels adjacent to these properties and would require tie back and lagging techniques during construction. As shown in Table IV.H-13, heavy equipment and caisson drilling activities within 5 feet of the adjacent off-site buildings with no setback would have the potential to exceed 0.995 PPV in/sec., which exceeds the threshold for causing potential building damage. The construction vibration levels at 507 S. Bixel would be below the threshold of significance for building damage. Excavation activities adjacent to existing structures are governed under both the California Civil Code and the Los Angeles Municipal Code ("LAMC"), which impose affirmative obligations on excavating landowners to protect against damage to adjacent structures. Civil Code Section 832 requires that excavating owners give notice of the excavation to owners of adjoining lands and buildings, use ordinary care and skill and take reasonable precautions to sustain adjoining land. Civil Code Section 832 imposes additional obligations on owners excavating deeper than nine feet. LAMC Section 91.3307 requires that adjoining public and private property, including without limitation footings and foundations, be protected from damage during construction. Thus, with adherence to applicable codes and regulations governing the protection of adjacent structures during construction activities, groundborne vibration damage to nearby buildings would be less than significant.

b. Cumulative Impacts

Construction of the Proposed Project in combination with related projects would result in an increase in construction-related noise and vibration in this already urbanized area of the City. The Project Applicant has no control over the timing or sequencing of the related projects that have been identified within the Proposed Project study area. Related Project No. 23 (the Bixel and Lucas Project), located directly south of the Project Site is currently under construction as is scheduled to be occupied by time construction of the Project commences. Thus, it would not contribute to cumulative noise and vibration impacts and the construction activities would not overlap with the Project's construction schedule. Related Project No. 16 (1027 Wilshire Boulevard) and Related Project No. 78 (459 S. Hartford Avenue) are located approximately 500 feet southeast and west of the Project Site, respectively. Both of these related project sites are separated from the Project Site by intervening roads and existing buildings. However, if their construction schedules were to overlap with the Proposed Project's construction schedule, it is

possible that the Proposed Project's significant noise impacts would contribute to significant cumulative noise impacts. Due to the relative distance and intervening structures between each project site, groundborne vibration impacts from one project would not combine with the other projects such that cumulative groundborne vibration impacts would occur. While the timing of the potential construction schedules of the project and related projects is somewhat uncertain and unpredictable, it is possible that all three projects generate construction activities that overlap. Thus, the Proposed Project's construction noise impacts would result in a potentially significant cumulative impact on a short term and temporary basis.

c. Project Design Features

The Proposed Project does not identify or propose any Project Design Features related to construction noise and groundborne vibration impacts.

d. Mitigation Measures

MM H-1: Noise and groundborne vibration construction activities whose specific location on the Project Site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest off-site sensitive land uses.

MM H-2: Construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.

MM H-3: Flexible sound control curtains shall be placed around all drilling apparatuses, drill rigs, and jackhammers when in use.

MM H-4: The Project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices (consistent with manufacturer's specifications). All equipment shall be properly maintained. Construction contractor shall keep documentation on-site demonstrating that the equipment has been maintained in accordance with the manufacturer's specifications.

MM H-5: Barriers such as plywood structures or flexible sound control curtains shall be erected around the Project Site boundary to minimize the amount of noise on the surrounding land uses during construction.

e. Findings

The Proposed Project would result in unavoidable significant impacts to construction noise and groundborne vibration impacts. Implementation of Mitigation Measures MM H-1 through H-5 would lessen adverse impacts associated with construction noise and groundborne vibration impacts but would not reduce those impacts to a less than significant level, and construction noise and groundborne vibration impacts would remain significant and unavoidable. Specific economic, legal, social, technological or other considerations make infeasible additional mitigation measures or project alternatives identified in the EIR.

f. Rationale for Findings

Construction-related noise and groundborne vibration impacts associated with the Proposed Project's on site construction activities would be significant and unavoidable after mitigation.

g. Reference

For a complete discussion of environmental impacts with respect to construction noise and groundborne vibration impacts, please see Section IV.H, Noise of the Draft EIR and Section II, Corrections and Additions, of the Final EIR.

I. ALTERNATIVES TO THE PROPOSED PROJECT

1. Summary of Findings

Based upon the following analysis, the City finds, pursuant to CEQA Guidelines Section 15096(g)(2), that only the No Project Alternative would completely avoid all of the significant and unavoidable impacts the Project would have on the environment. However, the No Project Alternative would fail to meet the stated project objectives. Based on a review of the remaining project alternatives identified in the EIR, none of the alternatives would be effective in eliminating the Project's significant and unavoidable construction noise and groundborne vibration impacts. Both the Adaptive Reuse Alternative and the Commercial Reuse Alternative would eliminate the project's significant and unavoidable impact associated with the proposed demolition of a historic resource. Of these two alternatives, the Adaptive Reuse Alternative was selected as the Environmentally Superior Alternative because it would further reduce the Project's less than significant impacts with respect to aesthetics, air quality, operational noise, and traffic, and would have the potential to meet the project objectives to a greater degree than the other alternatives evaluated. However, the Adaptive Reuse Alternative would not be effective in substantially reducing or eliminating all of the Project's adverse environmental impacts and would be less effective in achieving the stated project objectives.

2. Project Objectives

An important consideration in the analysis of alternatives to the proposed Project is the degree to which such alternatives would achieve the objectives of the proposed Project. To facilitate this comparison, the objectives of the proposed Project contained in Section II, Project Description, of the Draft EIR were compared to the alternatives.

The underlying purpose of the Proposed Project is to transform a series of underutilized parcels into an integrated smart-growth, mixed use development that provides mid-rise residential, retail and restaurant uses in the Central City West Specific Plan area of the City of Los Angeles. The following Project-specific objectives have been identified.

1. To contribute to the revitalization of the Central City West Specific Plan area by providing new "smart-growth" infill development with residential, retail and restaurant uses;
2. To provide housing in order to contribute to housing needs based on the current and projected housing demand in the City of Los Angeles;
3. To provide new high-quality structures that meet current California Green Code (Cal Green) and the City of Los Angeles Green Building Code standards;
4. To provide a viable project that promotes the City's economic well-being by significantly increasing sales and tax revenues;
5. To enhance the neighborhood with new, modern, and attractive infill, predominantly residential mid-rise development;

6. To orient housing and retail toward the street to make for a safer neighborhood ("eyes on the street") and enhancing pedestrian activity by including residential stoops and other design features;
7. To support a reduction in vehicle miles traveled by providing high-density multi-family housing and jobs in a designated Transit Priority Area in close proximity to mass transit;
8. To create an arrangement of land uses and new development that encourage and contribute to the economic, social, and physical health of the expanding residential community in the Westlake community;
9. To provide on-site parking in secure areas on-site that minimizes the distance between the future tenants' and visitors' parking space and destination;
10. To activate the retail pedestrian activity on 6th Street with neighborhood-serving commercial retail land uses that are highly visible and accessible at-grade level; and
11. To provide a balance of residential unit types and sizes that will accommodate a variety of residential needs for an array of household types in a transit oriented district within close proximity to employment opportunities and schools.

3. Project Alternatives

a. No Project Alternative

i. Description of the Alternative

The No Project Alternative is the circumstance under which the Proposed Project does not proceed. CEQA Guidelines (Section 15126.6(e)) provides that the "no project" analysis shall discuss the existing conditions at the time the Notice of Preparation is published, as well as what can reasonably be expected to occur in the foreseeable future if the project is not approved based on current plans and consistent with available infrastructure and community services. In March 2016, at the time the NOP was published for the Proposed Project, the Project Site was developed with approximately 111,272 gross square feet of building area, of which 97,242 square feet consisted of leasable floor area, with 27,204 square feet of general office, 58,112 square feet of medical office, 996 square feet of high turn over restaurant space, and 10,930 square feet of vacant office space. The North Block consists of a three-level parking structure that provides parking for the two commercial buildings on the South Block.

Under the No Project Alternative, no buildings would be demolished and no new buildings would be constructed. The parking structure on the North Block would remain as is with no changes. It is reasonable to assume that there would continue to be fluctuation in the active leasable area on the South Block. Building repair and upgrades would be necessary for the commercial uses to remain occupied and viable. While it may be possible for commercial vacancies to fluctuate over time, the No Project Alternative assumes that the leasable area of the two commercial office and medical office buildings on the South Block would remain similar to current conditions. Currently, the commercial office and medical office buildings are operating with a vacancy rate of approximately 11 percent. In the second quarter of 2016, the average vacancy rate for the downtown Los Angeles office space market was approximately 14 percent. Thus, the assumption that the existing vacancy rate of approximately 11 percent would remain consistent in the immediate future is reasonable and supported by current market data. As such, the Project Site's active land uses would include approximately 97,242 square feet of leasable commercial space.

ii. Impact Summary of the No Project Alternative

The No Project Alternative would result in reduced less than significant impacts as compared to the Proposed Project with respect to Aesthetics, Air Quality, Archaeological Resources, Paleontological Resources, Geology/Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Land Use and Planning, Operational Noise, Population Housing and Employment, Public Services, Traffic, and Public Utilities. The Proposed Project's significant and unavoidable construction noise and groundborne vibration impacts would be avoided under the No Project Alternative as no new construction would occur. Additionally, the Proposed Project's significant and unavoidable impacts related to historic resources would be reduced to less than significant impacts as no demolition or new construction would occur under this alternative.

iii. Finding

Overall, the No Project Alternative would reduce adverse environmental impacts associated with construction noise and groundborne vibration and the demolition of historic resources when compared with the development of the Proposed Project. Therefore, this Alternative would be an environmentally superior alternative to the Project. However, the No Project Alternative would not address any of the project objectives. It is found pursuant to Public Resources Code Section 21081(a)(3), that specific economic, legal, social, technological, or other considerations, including considerations identified in Section L of these Findings (Statement of Overriding Considerations), make infeasible the No Project Alternative described in the EIR.

iv. Rationale for Finding

Under the No Project Alternative, the existing medical/general office uses and parking areas would continue to operate on the Project Site, and no improvements to the Project Site would occur. As such, the No Project Alternative would not meet the underlying purpose of the Project or the Project objectives to transform a series of underutilized parcels into an integrated smart-growth, mixed use development that provides mid-rise residential, retail and restaurant uses in the Central City West Specific Plan area of the City of Los Angeles. Specifically, the No Project Alternative would not:

- Contribute to the revitalization of the Central City West Specific Plan area by providing new "smart-growth" infill development with residential, retail and restaurant uses;
- Provide housing in order to contribute to housing needs based on the current and projected housing demand in the City of Los Angeles;
- Provide new high-quality structures that meet current California Green Code (Cal Green) and the City of Los Angeles Green Building Code standards;
- Provide a viable project that promotes the City's economic well-being by significantly increasing sales and tax revenues;
- Enhance the neighborhood with new, modern, and attractive infill, predominantly residential mid-rise development;
- Orient housing and retail toward the street to make for a safer neighborhood ("eyes on the street") and enhancing pedestrian activity by including residential stoops and other design features;
- Support a reduction in vehicle miles traveled by providing high-density multi-family housing and jobs in a designated Transit Priority Area in close proximity to mass transit;
- Create an arrangement of land uses and new development that encourage and contribute to the economic, social, and physical health of the expanding residential community in the Westlake community;

- Provide on-site parking in secure areas on-site that minimizes the distance between the future tenants' and visitors' parking space and destination;
- Activate the retail pedestrian activity on 6th Street with neighborhood-serving commercial retail land uses that are highly visible and accessible at-grade level; and
- Provide a balance of residential unit types and sizes that will accommodate a variety of residential needs for an array of household types in a transit oriented district within close proximity to employment opportunities and schools.

b. Adaptive Reuse Alternative (Residential/Retail on the South Block and residential on the North Block)

i. Description of the Alternative

The Adaptive Reuse Alternative consists of a new residential development project with the preservation and adaptive re-use of the existing buildings on the South Block, converting the existing commercial uses to residential dwelling units in Building A and Building B with ground floor retail space in Building B on the South Block, and the redevelopment of the North Block with a mid-rise multi-family residential building. Under this Alternative, a total of 223 residential units would be provided with 9,810 square feet of commercial retail floor area and 227 structured parking spaces. 142 multi-family dwelling units would be provided on the North Block. The South Block would contain 81 multi-family dwelling units with 57 dwelling units in Building A and 24 dwelling units and 9,810 square feet of retail space in Building B. The retail area in Building B may be developed with up to 6,410 square feet of general retail space, 2,200 square feet of restaurant space, and a 1,200 square foot coffee shop. The basement level in Building A would be converted to storage areas and would include a basement level for the five townhome units.

Parking for this alternative would be provided within the new residential building on the North Block. Buildings A and B on the South Block do not have any existing space allocated for parking areas and have existing covenants that require the parking demands to be accommodated in the neighboring North Block. Thus, all parking would be provided in the structured parking garage on the North Block. Under this alternative, two levels of underground parking and two levels of above grade parking would be provided. Vehicular access to the North Building would be provided via one ingress/egress driveway on the alleyway. On-site parking would serve the residential parking demands for the North Building and Buildings A and B on the South Block and the retail parking demand for Building B. Similar to the Proposed Project, the alley would be converted to a one-way westbound operation.

The Adaptive Reuse Alternative would require and provide a total of 227 parking spaces with 132 residential spaces for the North Block, 79 residential spaces for Buildings A and B on the South Block, and 16 retail spaces for Building B on the South Block. Similar to the Proposed Project, this Alternative would seek a 10 percent reduction in the number of residential stalls required, and a 20 percent reduction in the number of commercial stalls required pursuant to LAMC 12.21.A.4.

The building height, scale, and massing of the North Building under this alternative would be the same as the Proposed Project. Architectural features for the North Block would include a mix of materials and architectural elements, which may include but is not limited to: aluminum windows, pre-finished metal panels, painted metal railing, glass railing, vinyl window, exterior plaster, and composite siding.

ii. Impact Summary of the Adaptive Reuse Alternative

The Adaptive Reuse Alternative would result in similar less than significant impacts as the Proposed Project with respect to Geology/Soils, Hazards and Hazardous Materials, and Land Use and Planning. This Alternative would result in reduced less than significant impacts as compared to the Proposed Project with respect to Aesthetics, Air Quality, Archaeological Resources, Paleontological Resources, Greenhouse Gas Emissions, Operational Noise, Population Housing and Employment, Public Services, Traffic and Public Utilities. The Proposed Project's significant and unavoidable construction noise and groundborne vibration impacts would be reduced but would still remain significant and unavoidable. The Proposed Project's significant and unavoidable impacts related to historic resources would be reduced to less than significant impacts under this alternative.

iii. Finding

Overall, the Adaptive Reuse Alternative would reduce some adverse environmental impacts when compared with the development of the proposed Project but would not eliminate all of the proposed Project's significant impacts. The Adaptive Reuse Alternative would not fully meet any of the proposed Project's objectives. Rather, this Alternative would only partially meet or be incompatible with some of the proposed Project's objectives. It is found pursuant to Public Resources Code Section 21081(a)(3), that specific economic, legal, social, technological, or other considerations, including considerations identified in Section L of these Findings (Statement of Overriding Considerations), make infeasible the Adaptive Reuse Alternative described in the EIR.

iv. Rationale for Finding

While the Adaptive Reuse Alternative would meet the underlying purpose of the Project to transform a series of underutilized parcels into an integrated smart-growth, mixed use development that provides mid-rise residential, retail and restaurant uses in the Central City West Specific Plan area of the City of Los Angeles, this alternative would fail to meet the following project specific stated objectives:

- To provide new high-quality structures that meet current California Green Code (Cal Green) and the City of Los Angeles Green Building Code standards;
- To provide a viable project that promotes the City's economic well-being by significantly increasing sales and tax revenues;
- To orient housing and retail toward the street to make for a safer neighborhood ("eyes on the street") and enhancing pedestrian activity by including residential stoops and other design features;
- To provide on-site parking in secure areas on-site that minimizes the distance between the future tenants' and visitors' parking space and destination;
- To activate the retail pedestrian activity on 6th Street with neighborhood-serving commercial retail land uses that are highly visible and accessible at-grade level; and
- To provide a balance of residential unit types and sizes that will accommodate a variety of residential needs for an array of household types in a transit oriented district within close proximity to employment opportunities and schools.

Additionally, as noted in Table V.F-2 in the Draft EIR, this alternative would only partially meet the project's stated Objectives 1 and 5. With respect to Objective 1 (to contribute to the revitalization of the Central City West Specific Plan area by providing new "smart-growth" infill development with residential, retail and restaurant uses) reutilization of the parking structure on the North Block under this alternative would represent smart growth principles by making better utilization of the

land with respect to increasing density in a developed part of the city. Although no new development would occur on the South Block, the adaptive reuse of the existing buildings would contribute to the revitalization of the neighborhood as it would keep the site active and productive with residential and retail land uses. With respect to Objective 5 (to enhance the neighborhood with new, modern and attractive infill predominantly residential mid-rise development) this alternative would provide new construction on the North Block (replacing an unsightly garage with residential uses), and would include interior aesthetic improvements to the existing structures on the South Block. The unattractive older buildings on the South Block would remain in place and there would not be an appreciable improvement in the appearance and curb appeal of the neighborhood as viewed from 6th Street.

c. Commercial Reuse Alternative (retail/Office on the South Block and Residential on the North Block)

i. Description of the Alternative

The Commercial Reuse Alternative consists of a new residential development project on the North Block with the preservation and commercial re-use of the existing buildings on the South Block with commercial office and retail land uses. Under this Alternative, a total of 142 residential units would be provided with 84,305 square feet of commercial area consisting of approximately 74,495 square feet of general office floor area and 9,810 square feet of ground floor retail space. A summary of the development program under this alternative is provided in Table V.D-1, Commercial Reuse Alternative Project, below. The increased parking demands associated with retaining the existing office uses on the South Block would require a redesign of the multi-family residential building on the North Block to include 7 levels of parking (two below grade and five above grade) and would necessitate constructing a high-rise residential building with 10 residential levels above the parking podium. The total height of the building would increase to approximately 150 feet above grade.

Parking for the Commercial Reuse Alternative would be provided within the new residential building on the North Block. Buildings A and B on the South Block do not have any existing space allocated for parking areas and have existing covenants that require the parking demands to be accommodated in the neighboring North Block. Thus, all parking would be provided in the structured parking garage on the North Block. Vehicular access to the North Building would be provided via one ingress/egress driveway on the alleyway. On-site parking would serve the residential parking demands for the North Building and Buildings A and B on the South Block and the retail parking demand for Building B. Similar to the Proposed Project, the alley would be converted to a one-way westbound operation.

The Commercial Reuse Alternative would require and provide a total of 454 parking spaces with 137 residential spaces for the North Building, and 315 commercial spaces for Buildings A and B on the South Block. Similar to the Proposed Project, this Alternative would seek a 10 percent reduction in the number of residential stalls required.

Under the Commercial Reuse Alternative, the scale and massing of the North Block would be altered substantially to accommodate the increased parking demands. As a result of retaining the existing buildings in place on the South Block, all parking for the South Block would be provided on the North Block. Parking within the North Building would include two levels of subterranean parking and five levels of parking above grade. The building height of the North Building would increase by approximately 52 feet from 98 feet and 2 inches to approximately 150 feet. The height of the structure would be approximately 526 feet above mean sea level (MSL), which is still well

below the CCWSP's maximum height limit of 1,218 feet above MSL. The below grade parking garage would be similar to the Proposed Project. The additional five parking levels above grade would alter the scale and character of the proposed building in that the residential units would start on the sixth level and would include 10 residential floors with a smaller building footprint atop the parking podium.

ii. Impact Summary of the Commercial Reuse Alternative

The Commercial Reuse Alternative would result in similar less than significant impacts as the Proposed Project with respect to Geology/Soils, Hazards and Hazardous Materials, and Land Use and Planning. This Alternative would result in increased less than significant impacts as compared to the Proposed Project with respect to Aesthetics, Air Quality, Operational Noise and Traffic impacts. This Alternative would result in reduced less than significant impacts as compared to the Proposed Project with respect to Archaeological Resources, Paleontological Resources, Greenhouse Gas Emissions, Population Housing and Employment, Public Services, and Public Utilities. The Proposed Project's significant and unavoidable construction noise and groundborne vibration impacts would be reduced but would still remain significant and unavoidable. The Proposed Project's significant and unavoidable impacts related to historic resources would be reduced to less than significant impacts.

iii. Finding

Overall, the Commercial Reuse Alternative would reduce some adverse environmental impacts when compared with the development of the proposed Project but would not eliminate all of the proposed Project's significant impacts. The Commercial Reuse Alternative would not fully meet the proposed Project's objectives. Rather, this Alternative would only partially meet or be incompatible with some of the proposed Project's objectives. It is found pursuant to Public Resources Code Section 21081(a)(3), that specific economic, legal, social, technological, or other considerations, including considerations identified in Section L of these Findings (Statement of Overriding Considerations), make infeasible the Commercial Reuse Alternative described in the EIR.

iv. Rationale for Finding

While the Commercial Reuse Alternative would meet the underlying purpose of the Project to transform a series of underutilized parcels into an integrated smart-growth, mixed use development that provides mid-rise residential, retail and restaurant uses in the Central City West Specific Plan area of the City of Los Angeles, this alternative would fail to meet the following project specific stated objectives:

- To provide new high-quality structures that meet current California Green Code (Cal Green) and the City of Los Angeles Green Building Code standards;
- To provide a viable project that promotes the City's economic well-being by significantly increasing sales and tax revenues;
- To orient housing and retail toward the street to make for a safer neighborhood ("eyes on the street") and enhancing pedestrian activity by including residential stoops and other design features;
- To provide on-site parking in secure areas on-site that minimizes the distance between the future tenants' and visitors' parking space and destination;
- To activate the retail pedestrian activity on 6th Street with neighborhood-serving commercial retail land uses that are highly visible and accessible at-grade level; and

- To provide a balance of residential unit types and sizes that will accommodate a variety of residential needs for an array of household types in a transit oriented district within close proximity to employment opportunities and schools.

Additionally, as noted in Table V.F-2 in the Draft EIR, the Commercial Reuse Alternative would only partially meet the project's stated Objectives 1 and 5. With respect to Objective 1 (to contribute to the revitalization of the Central City West Specific Plan area by providing new "smart-growth" infill development with residential, retail and restaurant uses) reutilization of the parking structure on the North Block under this alternative would represent smart growth principles by making better utilization of the land with respect to increasing density in a developed part of the city. Although no new development would occur on the South Block, the adaptive reuse of the existing buildings would contribute to the revitalization of the neighborhood as it would keep the site active and productive with residential and retail land uses. With respect to Objective 5 (to enhance the neighborhood with new, modern and attractive infill predominantly residential mid-rise development) this alternative would provide new construction on the North Block (replacing an unsightly garage with residential uses, and would include interior aesthetic improvements to the existing structures on the South Block. The unattractive older buildings on the South Block would remain in place and there would not be an appreciable improvement in the appearance and curb appeal of the neighborhood as viewed from 6th Street.

d. Reduced Density Alternative

i. Description of the Alternative

The Reduced Density Alternative would result in the development of a mixed-use project, similar to the Proposed Project, but with an approximate 25 percent reduction in total floor area and residential density. Similar to the Proposed Project, the Reduced Density Alternative would include the demolition of the existing structures on-site and the construction of two buildings; a five–story residential building fronting 5th Street and a six-story mixed use residential building with ground floor retail space on W. 6th Street. The Reduced Density Alternative would consist of 277 residential units and 16,500 square feet of ground floor retail use. The North Building would include 103 residential units and the South Building would include 174 residential units with approximately 16,500 square feet of ground floor retail space. The retail space may include retail, restaurant, and coffee shop uses. Similar to the Proposed Project the two buildings would be connected by a footbridge that spans above the adjacent alleyway.

The Project Site's gross lot area is approximately 83,659 square feet. Total allowable floor area ratio (FAR) for the Site is 4.70:1, which allows up to 363,228 square feet of development. The Reduced Density Alternative proposes approximately 229,989 square feet of floor area, which results in a FAR of 3.0:1.

The proposed residential and mixed-use structures would be developed within the same general building footprint as proposed under the Proposed Project, but would include reduced building heights. As compared to the Proposed Project, the North Building would be reduced by two floors and would include five levels of residential above grade and two levels of subterranean parking. The South Building would be reduced by one level and would include six levels above grade and one and one-half levels below grade.

Parking and access for the Reduced Density Alternative would be similar to the Proposed Project, but the number of parking stalls would be reduced to correspond to the reduction in parking demand. Parking would be provided on-site via multi-level structures located under the two

proposed buildings, with three access points provided. Parking within the South Building would be provided within two levels of subterranean parking and partially at-grade. Vehicular access to the South Building would be provided via one ingress/egress driveway on 6th Street and one ingress/egress driveway on the adjacent alleyway. Parking within the North Building would be provided in one level of subterranean parking and one level partially at-grade. Vehicular access to the North Building would be provided via one ingress/egress driveway from the alley. On-site parking would serve both residential and retail uses. Retail parking would be provided in the South Building and accessed through the 6th Street vehicular driveway. Residential parking for both buildings would be accessed through the driveways along the alleyway. As part of the Proposed Project, this alley would be converted to one-way westbound operation.

ii. Impact Summary of the Reduced Density Alternative

The Reduced Density Alternative would result in similar less than significant impacts as the Proposed Project with respect to Aesthetics, Archaeological Resources, Paleontological Resources, Geology/Soils, Hazards and Hazardous Materials, and Land Use and Planning. This Alternative would result in reduced less than significant impacts with respect to Air Quality, Greenhouse Gas Emissions, Operational Noise, Population Housing and Employment, Public Services, Traffic, and Public Utilities. The Proposed Project's significant and unavoidable construction noise and groundborne vibration impacts would be reduced, but would still remain significant and unavoidable under this Alternative. The Proposed Project's significant and unavoidable impacts related to historic resources would remain the same under this alternative.

iii. Finding

Overall, the Reduced Density Alternative would fail to reduce any of the significant unavoidable environmental impacts when compared with the development of the proposed Project. The Reduced Density Alternative would not fully meet the proposed Project's objectives. Rather, this Alternative would only partially meet or be incompatible with some of the proposed Project's objectives. It is found pursuant to Public Resources Code Section 21081(a)(3), that specific economic, legal, social, technological, or other considerations, including considerations identified in Section L of these Findings (Statement of Overriding Considerations), make infeasible the Reduced Density Alternative described in the EIR.

iv. Rationale for Finding

While the Reduced Density Alternative would meet the underlying purpose of the Project to transform a series of underutilized parcels into an integrated smart-growth, mixed use development that provides mid-rise residential, retail and restaurant uses in the Central City West Specific Plan area of the City of Los Angeles, this alternative would not be able to accomplish or support the specific stated objectives in the EIR to the same extent as the Proposed Project.

e. Environmentally Superior Alternative

Section 15126.6(e)(2) of the CEQA Guidelines indicates that an analysis of alternatives to a project shall identify an Environmentally Superior Alternative among the alternatives evaluated in an EIR. The CEQA Guidelines also state that should it be determined that the No Project Alternative is the Environmentally Superior Alternative, the EIR shall identify another Environmentally Superior Alternative among the remaining alternatives.

As discussed in Section V.F, Project Alternatives, Environmentally Superior Alternative, the No Project Alternative was identified as the Environmentally Superior Alternative as it would eliminate the Project's significant and unavoidable impacts related to the loss of a designated historic resource and construction noise and groundborne vibration impacts. Pursuant to Section 15126.6(e)(2) of the CEQA Guidelines, the Adaptive Reuse Alternative was selected as an alternate Environmentally Superior Alternative among the remaining alternatives evaluated in the EIR.

Based on a review of the remaining project alternatives identified in the EIR, none of the alternatives would be effective in eliminating the Project's significant and unavoidable construction noise and groundborne vibration impacts. Both the Adaptive Reuse Alternative and the Commercial Reuse Alternative would eliminate the project's significant and unavoidable impact associated with the proposed demolition of a historic resource. Of these two alternatives, the Adaptive Reuse Alternative was selected as the Environmentally Superior Alternative because it would further reduce the Project's less than significant impacts with respect to aesthetics, air quality, operational noise, and traffic, and would have the potential to meet the project objectives to a greater degree than the other alternatives evaluated.

J. FINDINGS REGARDING GENERAL IMPACT CATEGORIES

1. Growth Inducing Impacts

As discussed in Section IV.B, Growth Inducing Impacts of the EIR, the Proposed Project would result in a negligible increase in the City's population growth forecast, and would be within SCAG's regional population growth projection. The Proposed Project's population growth represents approximately 0.15 percent of the total population growth anticipated to occur within the City of Los Angeles between 2012 and 2040, as stated in SCAG's 2016-2040 RTS/SCS.
On a regional scale, the Proposed Project represents only 0.03 percent of the growth that is expected to occur in the SCAG region between 2012 and 2040.

Further, the Project Site is located in an infill property and is adequately supported by existing roadways and is already served by existing infrastructure associated with sewer systems, potable water delivery systems, electricity, and natural gas. Additionally, the Project Site is adequately served by public services including fire, police, schools and parks and would not generate the need for additional services or service provider infrastructure to serve the Project Site. Based on the environmental findings presented in Sections IV.J. Public Services and Section IV.L, Public Utilities, the Project would result in a less than significant impact with respect to growth inducing impacts.

2. Significant Irreversible Impacts

The Proposed Project would necessarily consume limited, slowly renewable and non-renewable resources. This consumption would occur during construction of the Proposed Project and would continue throughout its operational lifetime. The development of the Proposed Project would require a commitment of resources that would include: (1) building materials; (2) fuel and operational materials/resources; and (3) the transportation of goods and people to and from the Project Site.

Construction of the Proposed Project would require consumption of resources that are not replenishable or which may renew so slowly as to be considered non-renewable. These resources would include certain types of lumber and other forest products, aggregate materials used in

concrete and asphalt (e.g., sand, gravel and stone), metals (e.g., steel, copper and lead), petrochemical construction materials (e.g., plastics), and water. Fossil fuels, such as diesel, gasoline and oil, would also be consumed in the use of construction vehicles and equipment.

The commitment of resources required for the type and level of proposed development would limit the availability of these resources for future generations for other uses during the operation of the Proposed Project. However, the consumption of natural resources associated with the Proposed Project would be of a relatively small scale and would be consistent with regional and local growth forecasts in the City of Los Angeles and the Southern California region as a whole.

Construction and operation of the Proposed Project would result in the irretrievable commitment of limited, slowly renewable, and non-renewable resources, which would limit the availability of these resources in the future. However, as discussed in Section IV, Environmental Impact Analysis, of the Draft EIR, while the commitment of such resources could potentially result in both primary and secondary impacts, the Proposed Project's use of nonrenewable resources would be on a relatively small scale and consistent with regional and local growth forecasts and development goals for the area. The loss of such resources would not be highly accelerated when compared to existing conditions. Therefore, although irreversible environmental changes would result from the Proposed Project, such changes would be considered less than significant.

K. OTHER CEQA CONSIDERATIONS

1. The City, acting through the Department of City Planning, is the "Lead Agency" for the project evaluated in the EIR. The City finds that the EIR was prepared in compliance with CEQA and the CEQA Guidelines. The City finds that it has independently reviewed and analyzed the EIR for the Proposed Project, that the Draft EIR which was circulated for public review reflected its independent judgment and that the Final EIR reflects the independent judgment of the City.

2. The City finds that the EIR provides objective information to assist the decision makers and the public at large in their consideration of the environmental consequences of the Project. The public review periods provided all interested jurisdictions, agencies, private organizations, and individuals the opportunity to submit comments regarding both the Draft EIR and Final EIR. The Final EIR was prepared after the review period and responds to comments made during the public review period.

3. The Department of City Planning evaluated comments on environmental issues received from persons who reviewed the Draft EIR. In accordance with CEQA, the Department of City Planning prepared written responses describing the disposition of the significant environmental issues raised. The Final EIR provides adequate, good faith and reasoned responses to the comments. The Department of City Planning reviewed the comments received and responses thereto and has determined that neither the comments received nor the responses to such comments add significant new information regarding environmental impacts to the Draft EIR. The Lead Agency has based its actions on a full appraisal of all viewpoints, including all comments received up to the date of adoption of these findings, concerning the environmental impacts identified and analyzed in the EIR.

4. The EIR evaluated the following potential Project and cumulative environmental impacts: Aesthetics; Air Quality; Cultural Resources, Geology and Soils; Greenhouse Gas Emissions; Hazards and Hazardous Materials; Land Use and Planning; Noise; Population Housing and Employment, Public Services (Fire Protection, Police Protection, Schools,

and Recreation and Parks); Traffic/Transportation; Utilities and Service Systems (Water Supply, Wastewater, Energy Conservation, and Solid Waste). Additionally, the EIR considered, in separate sections, Significant Irreversible Environmental Changes, Growth Inducing Impacts and potential secondary effects of the Project. The significant environmental impacts of the Project and the alternatives were identified in the EIR.

5. The project design features and mitigation measures identified for the Proposed Project were included in the Draft EIR and Final EIR. The final mitigation measures for the proposed project are described in the Mitigation Monitoring Program ("MMP"). Each of the project design features identified above and the mitigation measures identified in the MMP are hereby incorporated into the project. The City finds that the impacts of the project have been mitigated to the extent feasible by the mitigation measures identified in the MMP.

6. The responses to the comments on the Draft EIR, which are contained in the Final EIR, clarify and amplify the analysis in the Draft EIR.

7. Having reviewed the information contained in the EIR and in the administrative record, as well as the requirements of CEQA and the state CEQA Guideline regarding recirculation of Draft EIRs, the City finds that there is no new significant information in the Final EIR and finds that recirculation of the Draft EIR is not required.

8. CEQA requires the Lead Agency approving a project to adopt an MMP for the changes to the project which it has adopted or made a condition of project approval in order to ensure compliance with the mitigation measures during project implementation. The mitigation measures included in the EIR as certified by the City and included in the MMP as adopted by the City serves that function. The MMP includes all of the mitigation measures adopted by the City in connection with the approval of the Project and has been designed to ensure compliance with such measures during implementation of the Project. In accordance with CEQA, the MMP provides the means to ensure that the mitigation measures are fully enforceable. In accordance with the requirements of Public Resources Code Sec. 21081.6, the City hereby adopts the MMP.

9. In accordance with the requirements of Public Resources Code § 21081.6, the City hereby adopts each of the mitigation measures expressly set forth herein as conditions of approval for the project.

10. The custodian of the documents or other material which constitute the record of proceedings upon which the City's decision is based, is the City of Los Angeles, Department of City Planning.

11. The City finds and declares that substantial evidence for each and every finding made herein is contained in the EIR, which is incorporated herein by this reference, or is in the record of proceedings in the matter.

12. The City is certifying an EIR for, and is approving and adopting findings for, the entirety of the actions described in these Findings and in the EIR as comprising the Project. It is contemplated that there may be a variety of actions undertaken by other state and local agencies (who might be referred to as "responsible agencies" under CEQA). Because the City is the Lead Agency for the Project, the EIR is intended to be the basis for compliance with CEQA for each of the possible discretionary actions by other state and local agencies to carry out the Project.

13. The EIR is a Project EIR for purposes of environmental analysis of the project. A Project EIR examines the environmental effects of a specific project. The EIR serves as the primary environmental compliance document for entitlement decisions regarding the project by the City and the other regulatory jurisdictions.

L. STATEMENT OF OVERRIDING CONSIDERATIONS

The Final EIR identified unavoidable significant impacts resulting from the implementation of the Project. Section 21081 of the California Public Resources Code and Section 15093(b) of the CEQA Guidelines provide that when the decision of the public agency allows the occurrence of significant impacts that are identified in the EIR but are not at least substantially mitigated, the agency must state in writing the reasons to support its action based on the completed EIR and/or other information in the record. State CEQA Guidelines require, pursuant to CEQA Guidelines Section 15093(b), that the decision-maker adopt a Statement of Overriding Considerations at the time of approval of a project if it finds that significant adverse environmental effects have been identified in the EIR which cannot be substantially mitigated to an insignificant level or be eliminated. These findings and the Statement of Overriding Considerations are based on substantial evidence in the record, including but not limited to the EIR, including the reference library to the EIR, and documents and materials that constitute the record of proceedings.

The following impacts are not mitigated to a less than significant level for the Project, as identified in the EIR: (1) construction noise impacts, (2) construction groundborne vibration impacts, and (3) the demolition of two buildings recognized as historic resources. Accordingly, the City adopts the following Statement of Overriding Considerations. The City recognizes that significant and unavoidable impacts will result from implementation of the proposed Project. Having (i) adopted all feasible mitigation measures, (ii) rejected alternatives to the proposed Project, as discussed above, (iii) recognized all significant, unavoidable impacts, and (iv) balanced the benefits of the Project against the Project's significant and unavoidable impacts, the City hereby finds that the benefits outweigh and override the significant unavoidable impacts for the reasons stated below.

These overriding considerations of economic, social, aesthetic, and environmental benefits for the Project justify adoption of the Project and certification of the completed EIR. Each of the following overriding considerations separately and independently (i) outweighs the adverse environmental impacts of the Project, and (ii) justifies adoption of the Project and certification of the completed EIR. In particular, achieving the underlying purpose for the Project to transform a series of underutilized parcels into an integrated smart-growth, mixed use development that provides mid-rise residential, retail and restaurant uses in the Central City West Specific Plan area of the City of Los Angeles will be sufficient to override the significant environmental impacts of the Project. Additionally, implementation of the proposed Project would:

1. Contribute to the revitalization of the Central City West Specific Plan area by providing new "smart-growth" infill development with residential, retail and restaurant uses;
2. Provide housing in order to contribute to housing needs based on the current and projected housing demand in the City of Los Angeles;
3. Provide new high-quality structures that meet current California Green Code (Cal Green) and the City of Los Angeles Green Building Code standards;
4. Provide a viable project that promotes the City's economic well-being by significantly increasing sales and tax revenues;
5. Enhance the neighborhood with new, modern, and attractive infill, predominantly residential mid-rise development;

6. Orient housing and retail toward the street to make for a safer neighborhood ("eyes on the street") and enhancing pedestrian activity by including residential stoops and other design features;
7. Support a reduction in vehicle miles traveled by providing high-density multi-family housing and jobs in a designated Transit Priority Area in close proximity to mass transit;
8. Create an arrangement of land uses and new development that encourage and contribute to the economic, social, and physical health of the expanding residential community in the Westlake community;
9. Provide on-site parking in secure areas on-site that minimizes the distance between the future tenants' and visitors' parking space and destination;
10. Activate the retail pedestrian activity on 6th Street with neighborhood-serving commercial retail land uses that are highly visible and accessible at-grade level; and
11. Provide a balance of residential unit types and sizes that will accommodate a variety of residential needs for an array of household types in a transit oriented district within close proximity to employment opportunities and schools.