



DEPARTMENT OF CITY PLANNING

RECOMMENDATION REPORT

Central Los Angeles Area Planning Commission

Date: October 9, 2018
Time: 4:30 P.M.
Place: City Hall, Room 1070

Public Hearing: August 21, 2018
Appeal Status: Applicant or other aggrieved person may appeal to City Council within 15 days of the mailing date of the APC decision.
Expiration Date: September 28, 2018
Multiple Approval: Yes

Case No.: APCC-2017-2421-SPE-SPP
CEQA No.: ENV-2017-2422-EIR
Incidental Cases: N/A
Related Cases: CPC-1993-442-SP and corresponding EIR
Council No.: 14—Huizar
Plan Area: Central City North
Specific Plan: Alameda District
Certified NC: Los Angeles Historic Cultural
GPLU: Regional Center Commercial
Zone: ADP-RIO
Applicant: Coresite Real Estate (Brian Warren)
Representative: Armbruster Goldsmith & Delvac LLP (Matt Dzurec)

PROJECT LOCATION: 900 North Alameda Street, Los Angeles, CA 90012

PROPOSED PROJECT: Construction of a 93-foot high data center building containing up to 179,900 square feet of floor area and a 50-foot high parking structure having 216 spaces.

REQUESTED ACTION:

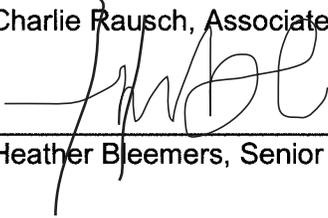
1. Pursuant to CEQA Guidelines Sections 15162 and 15164, in consideration of the whole of the administrative record, the project was assessed in the previously certified Environmental Impact Report for Case No. CPC-1993-442-SP, State Clearinghouse No. 1994031006, certified on June 18, 1996; and adopt the addendum dated July 5, 2018;
2. Pursuant to Los Angeles Municipal Code Section 11.5.7.F, Exception from Section 11.E of the Alameda District Specific Plan to permit reduced parking for the existing and proposed data center buildings; and
3. Pursuant to Los Angeles Municipal Code Section 11.5.7.C, Project Permit Compliance Review for compliance with the Alameda District Specific Plan.

RECOMMENDED ACTIONS:

1. **Find**, based on the independent judgement of the decision-maker, after consideration of the whole of the administrative record, the project was assessed in the previously certified Environmental Impact Report for Case No. CPC-1993-442-SP, State Clearinghouse No. 1994031006, certified on June 18, 1996; and pursuant to CEQA Guidelines Sections 15162 and 15164 and the addendum, dated July 5, 2018, that no major revisions to the EIR are required, and no subsequent EIR, or negative declaration is required for approval of the project;
2. **Approve a Specific Plan Exception** from Section 11.E of the Alameda District Specific Plan to permit reduced parking for the existing and proposed data center buildings;
3. **Approve a Project Permit Compliance Review** for compliance with the Alameda District Specific Plan; and
4. **Adopt** the attached Findings.

VINCENT P. BERTONI, AICP
Director of Planning

Charlie Rausch, Associate Zoning Administrator



Heather Bleemers, Senior City Planner



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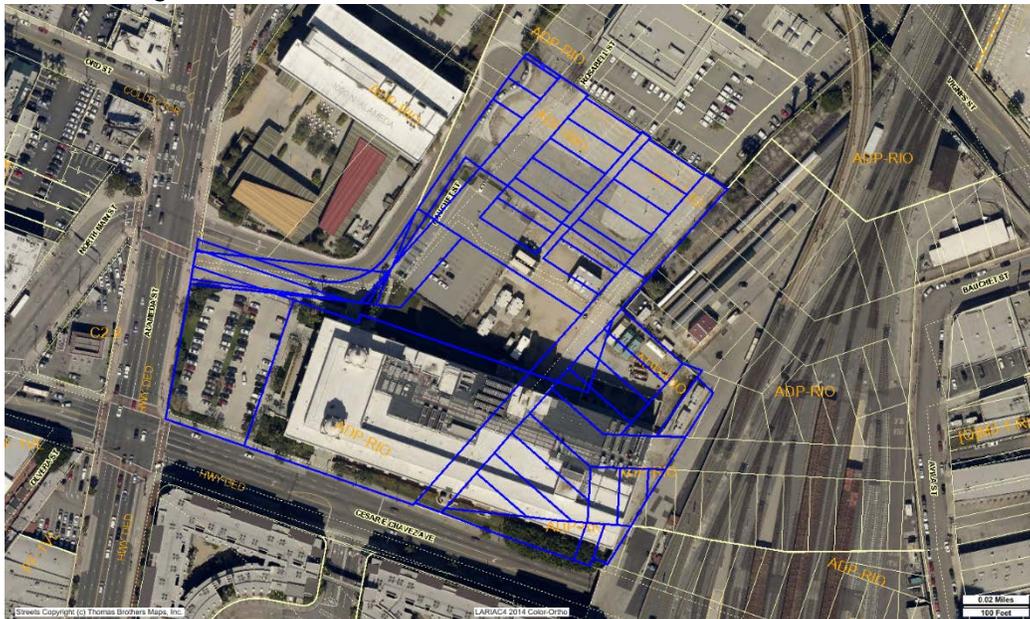
PROJECT ANALYSIS

PROJECT ANALYSIS

Project Location and Existing Uses

The project site comprises multiple contiguous parcels with a lot area of 354,700 square feet, and is bounded by Alameda Street to the west, Cesar Chavez Avenue to the south, and the elevated Metrolink tracks to the east. Property abutting the project site to the north and northwest is developed with the four-story California Endowment building and the Post Office Alameda Carrier Annex facility located on Vignes Street. The project site includes 275 feet of frontage on Alameda Street and 695 feet of frontage on Cesar Chavez Avenue. Below is an aerial photograph with the Project site shown in blue.

Project Site, Existing Aerial Photo and Parcels:

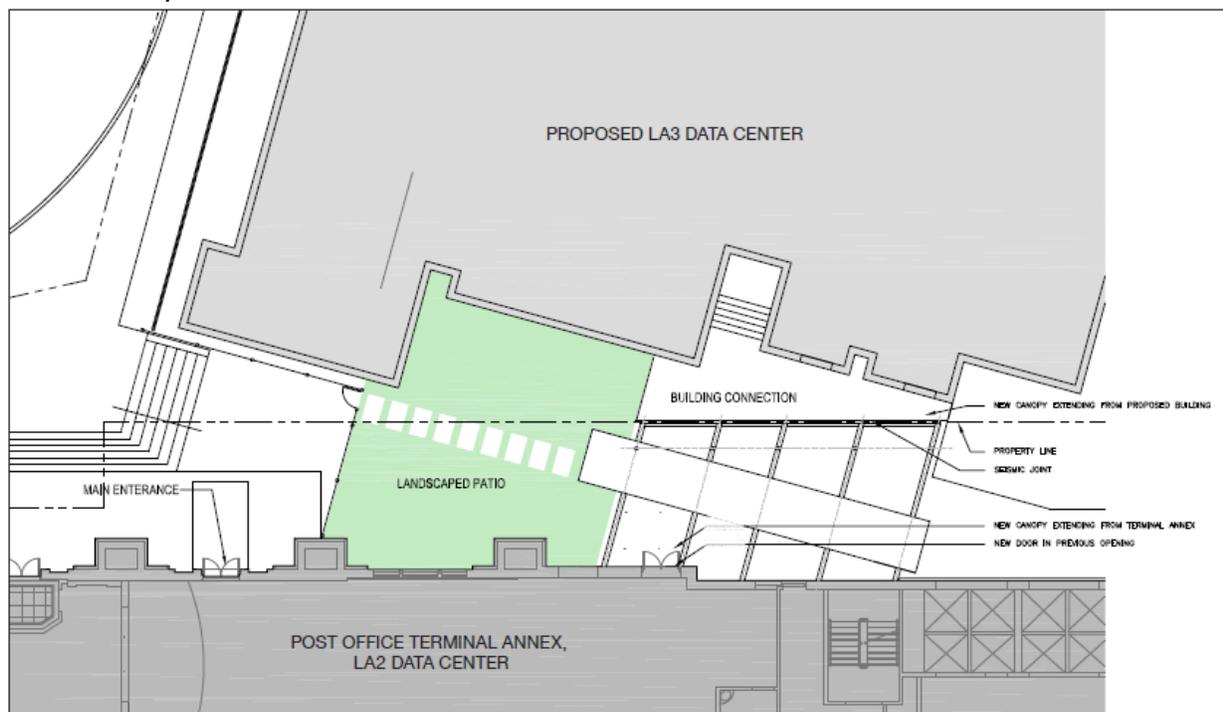


The project site is developed with the four-story, 91 feet in height United States Post Office Terminal Annex building (listed on the National Register of Historic Places), an equipment yard, and three surface parking lots. The Postal Service operates an approximately 12,000 square-foot retail post office within a small portion of the Terminal Annex building and the remaining 459,004 square feet of the building is occupied by telecommunication data storage uses. This existing data center is also operated by the Project applicant, Coresite, and as a data center is referred to as Coresite LA2. The Proposed Project is referred to as Coresite LA3.

Access to the building and parking would be provided from Alameda Street along Bauchet Street, along a private roadway that runs through the site. Existing landscaping includes ten small- to medium-sized deciduous trees that line Bauchet Street, a small, triangular landscaped space on the northern side of the Terminal Annex building with five palm trees, shrubs, and ground cover, and perimeter landscaping and a landscaped island on the parking lot west of the Terminal Annex building. The equipment yard contains backup generators for the Terminal Annex's building data center use and other supporting equipment.

The main entrance to the new data center building is proposed at the southern end of the building. To create an integrated operation, a covered walkway is proposed that would connect the new building's main entrance to the Terminal Annex building along a small portion of the rear façade as shown below:

Detail of Proposed Covered Patio Area:



The data center building would be steel frame construction with an exterior aluminum composite panel system, with materials that complement the historic Terminal Annex building including neutral-colored stone, masonry, concrete, or plaster.

The proposed parking structure would house backup generators for the new building data center on the ground floor, with four levels of parking above, including rooftop parking. Exterior finish materials would be chosen to match the texture and finish of the Terminal Annex and proposed new data center building.

The equipment yard would continue to be used as an open-air storage area for generators and associated electrical equipment. Additional electrical equipment that would be installed in the equipment yard includes switchgears, transformers, and standby generators. The equipment yard would be screened from view by the proposed parking structure to the north, the new data center building to the west, and is currently screened by the Terminal Annex to the south. The east side of the yard is currently screened from view by concrete walls, site topography, and Metrolink equipment, and would not change as a result of project implementation.

Vehicle Parking, Transit, and Pedestrian Access

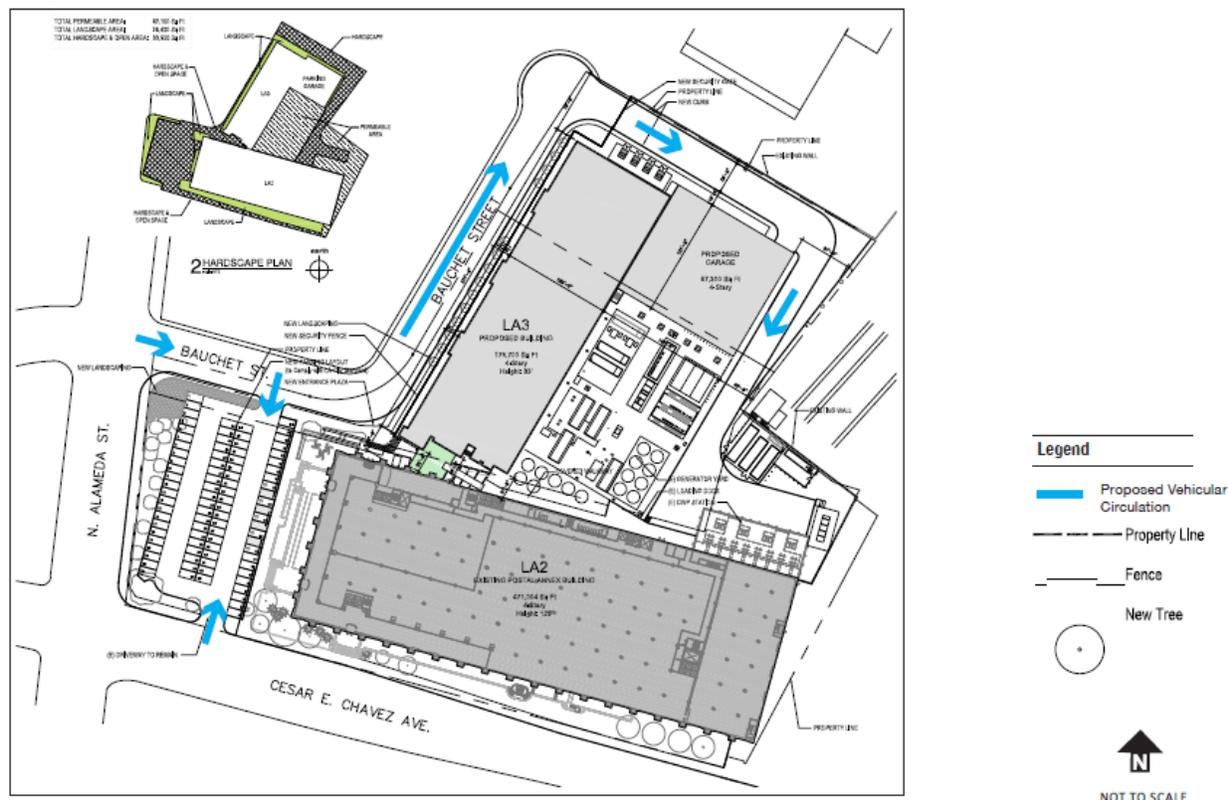
The project also includes construction of a four-story, 50-foot-high parking structure adjacent to the east end of the new building which would contain approximately 124 parking spaces. Additional project improvements include reconfiguration of the surface parking lot to the west of the Terminal Annex building to contain 84 parking spaces and will be improved with new landscaping, new lighting, a new driveway along the northern edge of the site, and the addition of generators and electrical switchgear in the existing equipment yard.

A total of 208 parking spaces are proposed to serve the new data center building and the Terminal Annex building uses. Given that the parking demand for the data center uses are substantially lower than the required parking set forth in the Alameda District Specific Plan of 1.1 space per 1,000 square feet, the Applicant is requesting an exception to permit parking for the data center uses based on the City's standard parking requirement for warehouse uses. Parking for warehouse uses, *i.e.*, 1 space per 500 square feet for the first 10,000 square feet, and 1 space per 5,000 square feet above the first 10,000 square feet, would align more with the actual demand for a data center.

To construct the new data center building and parking structure, existing surface parking would be removed. Parking spaces would be replaced within the proposed parking structure, which would also provide parking required for the new data center. Additionally, the existing parking lot west of the Terminal Annex building would be expanded. The parking lot currently has a total of 63 parking spaces, including four ADA spaces. The parking lot would be expanded to the north, paving over an undeveloped area between the existing parking lot and Bauchet Street, thereby increasing the number of parking spaces to 84. Existing site access would remain from Cesar Chavez Avenue and Bauchet Street, which have entrances to the parking lot west of the Terminal Annex building. This shared parking lot would provide access to both data centers and the post office.

Access to the proposed parking structure would be provided from Bauchet Street via a new curb cut and driveway along with north end of the site. The driveway would also maintain access to the eastern area of the equipment yard and loading dock. The driveway would also provide service vehicles and fire trucks access to the site. See the following figure for a vehicular access diagram.

Project Vehicular Access:



Persons who park their vehicles at the facility and other pedestrians would access both the new building and/or the Terminal Annex building through a single main entrance at the west side of the covered walkway joining the two buildings.

The Project Site is located across Cesar E. Chavez Avenue from Union Station, a complex that functions as the regional transportation hub of Los Angeles County, with such transportation facilities as inter-city passenger trains (Amtrak), commuter rail, subway, busways, shuttles, and taxis. The Patsaouras Transit Plaza, on the east side of the station, serves dozens of bus lines operated by Metro and several other municipal carriers. In addition, Metro Local bus lines 33, 68, 70, 71, 78, 79, and 378; Metro Rapid bus line 733; and LADOT DASH's Lincoln Heights/Chinatown bus line all have stops at the intersection of Alameda Street and Cesar Chavez Avenue, immediately adjacent to the Project Site. Pedestrian connections between the Terminal Annex and Union Station have been improved with hardscape treatments at intersections, lighting, and signage.

Surrounding Uses

As noted, the four-story California Endowment office and conference center is located adjacent to the Project Site on the northwest side of Bauchet Street. North of the Project is the Post Office Alameda Carrier Annex facility that is accessed from Vignes Street. South of the Project Site on the south side of Cesar Chavez Avenue is the 52.3-acre Union Station property. At the eastern

end of the Union Station property is Gateway Center, which contains the Los Angeles County Metropolitan Transportation Authority's (LACMTA) 26-story headquarters Building, and central maintenance and bus Layover facilities. Further to the south is the Santa Ana Freeway (US-101).

Land uses west of Alameda Street are primarily commercial. El Pueblo de Los Angeles Historic Monument, including the Olvera Street commercial/tourist area, is located west of the Union Station across Alameda Street. Other land uses west of the Terminal Annex property across Alameda Street are primarily retail and commercial. The Chinatown historical and commercial district is located two blocks west of the project site. Land uses north of the Terminal Annex property and Vignes Street are primarily industrial. Land uses to the east of the Project Site include railroad tracks and facilities owned by Metro, industrial uses, and public facilities including the Men's Central Jail and the Twin Towers Correctional Facility.

Environmental Clearance

An Addendum dated July 5, 2018, to the Environmental Impact Report (EIR) for the Alameda District Specific Plan, certified on June 18, 1996, was prepared for the data center project which analyzes and discloses the environmental effects that might reasonably result from the proposed changes to development under the Specific Plan approved in 1996. At the time that the EIR was prepared, there was no separate Environmental case number assigned to an EIR. As such, the original EIR is identified as being associated with Case No. CPC-1993-442-SP, State Clearinghouse No. 1994031006. As demonstrated in the Addendum, the project would not substantially increase the severity of the previously identified impacts in the Specific Plan EIR, and no new significant impacts would occur with implementation of the data center project. The applicable mitigation measures in the EIR would be required to be implemented by the data center project and no new additional mitigation measures are necessary.

Based on the foregoing, the Central City Area Planning Commission has determined that substantial changes resulting in new significant effects or a substantial increase in the severity of previously identified significant effects in the Specific Plan EIR would not occur with the data center project, substantial changes with respect to the circumstances under which the project is undertaken resulting in new significant effects or a substantial increase in the severity of previously identified significant effects in the Specific Plan EIR would not occur, and new information of substantial importance with respect to this environmental resource resulting in new significant effects or a substantial increase in the severity of previously identified effects in the Specific Plan EIR has not been identified. Therefore, a supplemental EIR is not required under CEQA.

PROJECT BACKGROUND

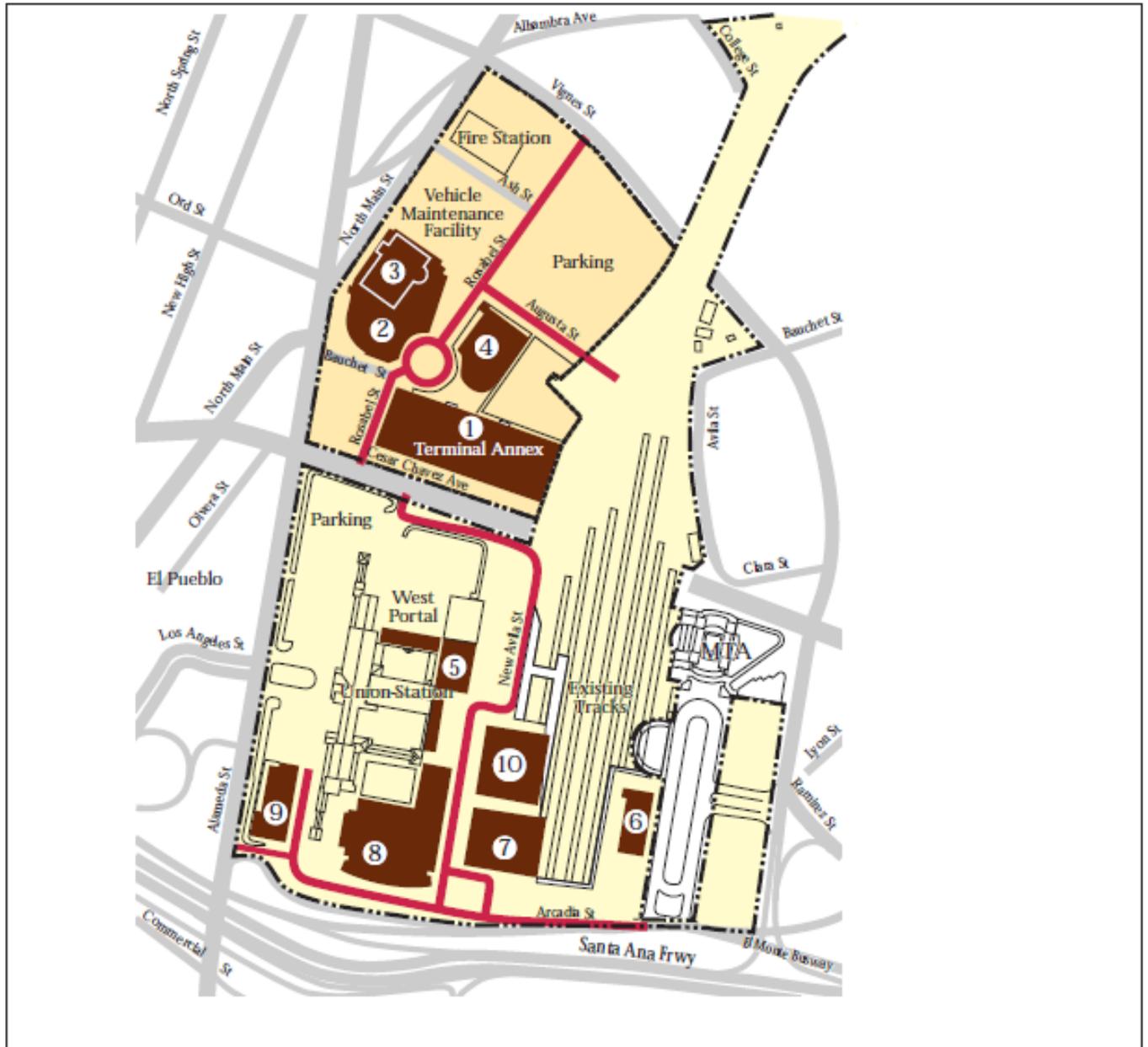
Existing Zoning and Land Use Regulations

The Project Site is located within the Central City North Community Plan area (Community Plan) which designates the Site for Regional Center Commercial land uses. The Site is located within the Alameda District Specific Plan (ADSP), on the Terminal Annex Property, in the Historic and Mixed Use/Office Subareas, with corresponding zoning of ADP-RIO. “ADP” indicates the zoning associated with the Alameda District Specific Plan, and “RIO” indicated that the Project Site is located within the River Improvement Overlay District.

The Specific Plan area is 70.5 acres in size and consists of two properties: the 52.3-acre Union Station property and the 18.2-acre United States Postal Service Terminal Annex property (Terminal Annex), including the Project Site. The Specific Plan is organized into two phases of land use development: Phase I and Buildout Phase. Phase I consists of 3,362,000 square feet of new and adaptive reuse development, with contemplated uses including commercial and government office space within the Terminal Annex subarea, and retail, commercial and government office space, and a museum on the Union Station subarea. The Buildout Phase consists of up to an additional 7,500,000 square feet of new development for a total of 10,405,000 square feet of commercial and government office, hotel and conference center, residential, and retail, land uses (Phase I and Buildout Phase combined). New development on the Terminal Annex property is anticipated to total 3,450,000 square feet and development on the Union Station property is anticipated to total 6,955,000 square feet.

The Specific Plan identified the anticipated development locations, uses, building heights, and building square footages within the two properties. The project is proposed in the location of Building #4 within the Terminal Annex property, which was never built. Building #4 was contemplated for development under Phase I, and was analyzed to be a 12-story (180-foot) commercial office building of up to 400,000 square feet of floor area. Access to Building #4 was planned through existing and proposed roadways, including construction of a new roundabout as shown below.

Alameda District Specific Plan, Phase I Analyzed Projects:



Adjacent Streets

Alameda Street is a north-south street adjacent to the west of the Project Site designated as an Avenue I. Right-of-way width is dedicated to 98 feet, with the roadway constructed to a 71-foot width, improved with sidewalks, curbs, and gutters.

Cesar E. Chavez Avenue is an east-west street adjacent to the south of the Project site designated as an Avenue I. Right-of-way width is somewhat variable, but is approximately 90 feet, with the roadway constructed to a 75-foot width, improved with sidewalks, curbs, and gutters.

Bauchet Street is a street as that extends to the east of Alameda Street, adjacent to the Project Site, then turns north near where the new building is proposed, ending in a cul-de-sac. It is undesignated but is constructed to a roadway width of between 35 and 48 feet, improved with sidewalks, curbs, and gutters.

Relevant Related Cases

On-Site:

Case No. APCC-2002-1745-SPE-PA1: On February 2, 2004, the Central Area Planning Commission approved a Specific Plan Exception Plan Approval of the "One-Year Review" evaluating compliance with the 2002 Specific Plan Exception permitting data center uses in the Terminal Annex building (now Coresite LA2) with a reduction in parking requirement rates similar to those being proposed by the Project.

Case No. APCC-2002-1745-SPE: On July 25, 2002, the Central Area Planning Commission approved an exception from the ADSP to permit reduced parking rates for the data center uses in the Terminal Annex Building (now Coresite LA2) similar to those being proposed by the Project, as follows:

- Telecommunication Uses required parking per Los Angeles Municipal Code ("LAMC") Section 12.21.A.4.C.1 (Warehouse Use) which requires one parking space per 500 square feet of floor area for the first 10,000 square feet and one parking space per 5,000 square feet for the remaining floor area over the first 10,000 square feet.
- Office and retail (post office uses) required parking of 1.1 spaces per 1,000 square feet of floor area in compliance with the ADSP.

Condition No. A.1 states that "in no event shall there be less than 276 total on-site parking spaces provided" and that parking shall be provided in substantial conformance with an attached parking plan. These reduced parking rates superseded the parking requirements of Case No. DIR-2000-4537-SPP, described below.

Case No. DIR-2000-4537-SPP: On November 29, 2000, the Director of Planning approved renovations to the historic Terminal Annex building to allow data center uses (now Coresite LA2), with the LAMC-required 520 parking spaces in a new six-level parking structure.

There are no relevant off-site cases.

PROJECT ISSUE ANALYSIS

Specific Plan Exception for Parking

The project proposes the construction of a new 179,900-square-foot data center building that would house computer servers and supporting equipment for private clients. The new building, also known as Coresite LA3, would complement the existing use of the Terminal Annex building located on the site which is also owned and operated by the applicant and predominately used for data storage except for a small 12,000 square-foot Post Office store. The project proposes to provide 208 parking spaces with 84 surface spaces and 124 spaces located within a proposed new four-story parking structure that would be located adjacent to the new data center building. These spaces would provide parking for both the proposed new data center building and the uses in the Terminal Annex building (also known as Coresite LA2).

Section 11.E.4 of the Specific Plan requires 1.1 parking spaces per 1,000 square feet for all non-residential uses, which would require 198 parking spaces for the new building. The existing Terminal Annex building requires 276 spaces for a total of 474 required spaces. In 2002, the Central Area Planning Commission approved Case APCC-2002-1745-SPE and granted a Specific Plan Exception to permit reduced parking for the telecommunications use in the Terminal Annex building and required parking based on the "Warehouse" rate in Los Angeles Municipal Code Section 12.21.A.4(c)(1) of one space per 500 square feet for the first 10,000 square feet and one space per 5,000 square feet for the additional square footage. The approval also required parking for the post office use in compliance with Section 11.E.4 of the Specific Plan and mandated that no less than 276 parking spaces shall be provided. At the time of this approval, only approximately 52 percent of the Terminal Annex building was occupied by telecommunication uses whereas now approximately 97.5 percent is occupied telecommunication uses, with 12,000 square feet occupied by the Post Office. Therefore, 276 parking spaces currently required are substantially greater than the demand generated by the data center uses.

Data centers are almost exclusively occupied by telecommunications switching and computer equipment and typically have very few employees present at the site at any one time. Those few employees who are present are there primarily for operating, maintaining and servicing the equipment. There are no typically no guest visitors to data centers. A parking demand analysis prepared by Gibson Transportation Consultation, Inc. concluded that the peak parking demand for all the uses (including the post office) would be 105 parking spaces during the week and 79 parking spaces on the weekend. Therefore, the proposed 208 spaces more than satisfies projected demand for the site uses. Based on the warehouse rate for the data center uses and the Specific Plan rate for the post office use, approximately 185 spaces would be required. Thus, the proposed 208 spaces would satisfy the required parking under the proposed exception to allow the data center uses to park using the City's warehouse rate.

The strict application of the non-residential project parking ratio contained in the Alameda District Specific Plan (1.1 spaces per 1,000 square feet of floor area) to the telecom uses of the subject site would result in practical difficulties and be inappropriate for the proposed uses, necessitating the construction of unnecessary additional on-site parking facilities where there is little likelihood or evidence that actual demand exists to comply with this parking standard.

Project Permit Compliance with the Alameda District Specific Plan

As demonstrated below, the Project complies with applicable regulations, findings, standards and provisions of the Specific Plan.

Specific Plan Maximum Floor Area

The project complies with the Maximum Permitted Floor Area permitted by the Alameda District Specific Plan (ADSP). The Specific Plan stipulates the maximum permitted floor area that can be developed in the specific plan area, to ensure compliance with the Specific Plan's certified EIR. The Specific Plan area is subdivided into two sites, the Terminal Annex site and the Union Station site, each of which is allotted a maximum permitted floor area that may be developed over two phases. The Phase I Cap for the Terminal Annex site is 1,393,700 square feet. The Terminal Annex Site is currently developed with 650,125 square feet of floor area that includes 471,004 square feet in the Terminal Annex building, 139,703 square feet in the California Endowment center and 39,418 square feet in the Postal Service Carrier Annex building. The project proposes 179,900 square feet of new floor area for a total of 830,025 square feet of floor area on the Terminal Annex site, well below the Phase I cap of 1,393,700 square feet.

Height/Floor Area Ratio

Section 7.B of the ADSP provides that "Each lot within the Specific Plan area includes a Height/Floor Area Ratio (Height/FAR) District designation. These Height/FAR Districts are their boundaries are shown on Map 5 by a combination of Zone Symbols and Height/FAR District number markings." Map 5 includes the project site within the boundary with a zoning of ADP-400/4.2 which permits a height of 400 feet and a 4.2 floor area ratio. The maximum height of the new data center building is 93 feet in height.

The Terminal Annex building is located on a parcel with a lot area of approximately of 194,432 square feet, which permits a total floor area of 816,614 square feet. The Terminal Annex building contains 471,004 square feet for a 2.42 floor area ratio. The proposed new data center building is located on a parcel with a lot area of approximately of 160,268 square feet which permit a total floor area of 673,125 square feet. The new data center building contains 179,900 square feet for a 1.12 floor area ratio.

Permitted Uses

The ADSP permits uses allowed in the C2 Zone as set forth in the Los Angeles Municipal Code. The City's 2016 published Use List permits "Computer Server Equipment Rooms" in the C2 Zone. As such, the project is an allowed use on the subject site.

Urban Design/Architecture

The proposed building is sited adjacent to the historic Terminal Annex Building but has been designed to allow enough space between them so that a pedestrian view corridor is maintained between the two buildings. A single project entry is marked by a steel canopy attached to the new building but will not encroach onto the adjoining historic structure. A small landscaped entry plaza at the top of a set of common stairs directs the visitor to the right at one of the original entries to the historic building. Once through security, the visitor may pass again through this plaza and view corridor to the entry to the new building. The proposed project is similar in mass

to the historic structure, similar in height although smaller in size. A continuous band of landscaping along Bauchet Street, which connects the historic and new buildings, is designed to unify the property and pedestrian perimeter. At the first-floor height, building materials are a combination of neutral grey board-formed concrete and cement fiber panels creating a compatibility with the neutral palette of the existing building. The exterior architecture on the upper floors is composed of formed metal panels which will provide shadows and articulation on the building skin much like the Mission style details do on the Terminal Annex Building. Vertical metal blades break up the length of the new building façade, creating a rhythm much as the arches and piers do on the historic building.

Location of Data Centers

The Coresite LA3 data center represents a change from the employment-heavy office building originally envisioned in the Alameda District Specific Plan, but a data center nevertheless represents a critical use for downtown Los Angeles that was not necessarily seen when the Specific Plan was approved in 1996.

Data centers are typically located in areas of heavy commerce. This is because physical proximity has a direct correlation to latency, which correlates to the speed and performance of services that power the digital economy. CoreSite's chosen location for the LA3 Data Center, near downtown Los Angeles, will enhance connectivity and minimized latency for users. The proposed LA3 Data Center is in proximity to CoreSite's presence in the One Wilshire building (LA1), which is a regional hub of a densely connected telecommunication network and cloud data center. The closer LA3 resides to LA1 as well as major business and residential centers, the better the performance of the applications and services that businesses and consumers use.

CoreSite's existing LA data center campus houses 240 telecommunication companies that provide service to the metro market, nationally and internationally for enterprises and households. This system forms a data and information transfer hub within the data center where companies can more quickly and cost effectively pass internet traffic and cloud computing data between each other's IT networks.

The rate that data is transferred between network end points is referred to as latency; low latency is critical to many companies' success. A 100-millisecond delay in data transfer may cost an online company a considerable amount of sales. Companies that are reliant on low latency data to move quickly (i.e., near real time) from one point to another, including many small and local businesses, will benefit greatly from being in close proximity to LA3.

Commerce is only one use case; many industries benefit from the near real time transfer of data (e.g., autonomous vehicles, virtual reality, medical imaging, and media-rendering for production of video content). As cloud computing becomes commonplace and essential, there is an increasing need to reduce latency, which is made possible by data centers centrally located in major metropolitan areas like Los Angeles.

CONCLUSION

The Proposed Project represents a unique opportunity to improve the telecommunications infrastructure near the busy commercial center of downtown Los Angeles. Data centers such as the Proposed Project are crucial for maintaining the competitive advantage of area businesses and public agencies that use the Internet and store large amounts of data. While the Alameda District Specific Plan originally analyzed an office building being developed on the site, Coresite's data center is an appropriate use for the Project Site as it will benefit area businesses and public agencies, is adjacent to Coresite's LA2 data center located in the historical Terminal Annex building, and it will be compatible with existing industrial, institutional, and public uses in the surrounding area.

The Specific Plan Exception for reduced parking is appropriate because a data center, while it may have a large floor area, employs very few workers. A data center is similar to a warehouse for computers and data storage, and it is thus appropriate that parking be required at rates similar to a warehouse. Furthermore, similar reduced parking requirements were already approved in 2002, and given a further approval in 2004 after a one-year review, for the data center now known as Coresite LA2 located in the Terminal Annex building on the subject Property.

The project is appropriate and meets the objectives of the Specific Plan. Therefore, granting the Project Permit Compliance review for compliance with the Alameda District Specific Plan is appropriate because the Proposed Project meets the use, design, height, and floor area requirements of the zoning and Specific Plan. The Proposed Project has been designed to complement the adjacent historic Terminal Annex building's height, massing, and design, without imitating its architecture. Similarly, the landscaping proposed for the Project site will meet current City standards of climate-appropriate plant selection.

An Addendum to the Environmental Impact Report of the original Specific Plan is the appropriate CEQA clearance for the Proposed Project. Despite proposing a different use than what was originally analyzed, no new significant impacts or intensification of any significant impacts were anticipated by the Project, and the analysis found no other cause for requiring a Supplemental Environmental Impact Report. The project's location, uses, height, design, and other features would be compatible with the surrounding neighborhood, and would not adversely affect public health, welfare, and safety. Therefore, Department of City Planning staff recommends that the Central Los Angeles Area Planning Commission approve the proposed project and entitlement requests with the attached Conditions and adopt the attached Findings.

CONDITIONS OF APPROVAL

A. Entitlement Conditions – Specific Plan Exception for Parking

1. **Parking Plan.** Parking on the subject site shall be provided in substantial conformance with the site plans labeled Exhibit B – Project Plans (pages SP101 [Site Plan – Proposed] and A101 [1st Floor Plan]) and dated September 7, 2018, attached to the administrative case file.
 - a. The minimum number of on-site parking spaces authorized by this action shall be provided in accordance with the following:
 - i. Telecommunications uses — per Section 12.21.A.4 (c)(1) of the Municipal Code (Warehouses).
 - ii. Any other use of the subject property shall have parking provided in accordance with the applicable requirements of the Alameda District Specific Plan.
 - b. In no event shall there be fewer than 208 total on-site parking spaces provided.
2. **Landscaping (Surface Parking).** All parking on the subject site shall be landscaped and improved consistent with the requirements set forth in Section 12.21.A.6 (g) of the Municipal Code. A landscape and automatic irrigation plan shall be approved by the Department of City Planning prior to planting.
3. **Electric Vehicle Charging.** New construction shall comply with Section 99.04.106.4.1 and 99.04.106.4.2 to facilitate future installation and use of EV chargers. Electric vehicle supply equipment (EVSE) shall be installed in accordance with City of Los Angeles Electrical Code, Article 625.

B. Entitlement Conditions – Project Permit Compliance

4. **Site Development.** The use and development of the Project Site shall be in substantial conformance with the Site Plans, Floor Plans, Building Elevations, Open Space Plan, and Landscape Plan (Exhibit B - Project Plans, dated September 7, 2018) of the subject case file. No change to the plans will be made without prior review by the Department of City Planning, and written approval by the Director of Planning. Each change shall be identified and justified in writing. Minor deviations may be allowed in order to comply with the provisions of the Municipal Code or the project conditions. The project shall be constructed in a manner consistent with the following:
 - (1) A data storage building with up to 179,900 square feet of floor area within a four-story, 93 feet in height building,
 - (2) A four-story, 50-foot-high parking structure containing 124 parking spaces, and
 - (3) Reconfiguration of the surface parking lot to the west of the Terminal Annex building to contain 84 surface-level parking spaces.
5. **Historic Sensitivity.** No new construction associated with the development of the Project Site shall damage the historic character of the Terminal Annex building. The new building shall be differentiated from the Terminal Annex building and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the Terminal Annex building and its environment.
6. **Hedges.** Existing hedges on the Project Site fronting Alameda Street shall be removed and replaced with landscaping in conformance with the Landscape Plan (Exhibit B – Project Plans,

dated September 7, 2018) of the subject case file. The plant palette for this area shall not include hedges.

7. **Easement Quitclaim.** The existing eight-inch VCP sewer line upstream of sewer manhole 51604064 shall be abandoned and the existing eight-foot sewer easement shall be quitclaimed.
8. **Solar-ready Buildings.** The Project shall comply with the Los Angeles Municipal Green Building Code, Section 99.05.211, to the satisfaction of the Department of Building and Safety.
9. **Tribal Cultural Resource Inadvertent Discovery.** In the event that objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities (including the following: excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, pounding posts, auguring, backfilling, blasting, stripping topsoil or a similar activity), all such activities shall temporarily cease on the project site until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:
 - Upon a discovery of a potential tribal cultural resource, the project Permittee shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project; (2) and the Department of City Planning at (213) 847-3688.
 - If the City determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be tribal cultural resource, the City shall provide any effected tribe a reasonable period of time, not less than 14 days, to conduct a site visit and make recommendations to the Project permittee and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.
 - The project Permittee shall implement the tribe's recommendations if a qualified archaeologist, retained by the City and paid for by the project Permittee, reasonably concludes that the tribe's recommendations are reasonable and feasible.
 - The project Permittee shall submit a tribal cultural resource monitoring plan to the City that includes all recommendations from the City and any effected tribes that have been reviewed and determined by the qualified archaeologist to be reasonable and feasible. The project Permittee shall not be allowed to recommence ground disturbance activities until this plan is approved by the City.
 - If the project Permittee does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist, the project Permittee may request mediation by a mediator agreed to by the Permittee and the City who has the requisite professional qualifications and experience to mediate such a dispute. The project Permittee shall pay any costs associated with the mediation.
 - The project Permittee may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by the qualified archaeologist and determined to be reasonable and appropriate.
 - Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton.
 - Notwithstanding the above, any information determined to be confidential in nature, by the City Attorney's office, shall be excluded from submission to the SCCIC or the

general public under the applicable provisions of the California Public Records Act, California Public Resources Code, and shall comply with the City's AB 52 Confidentiality Protocols.

C. Environmental Conditions

9. **Mitigation Monitoring Program.** The project shall be in substantial conformance with the mitigation measures in the attached MMP and stamped "Exhibit D" and attached to the subject case file. The implementing and enforcing agencies may determine substantial conformance with mitigation measures in the MMP. If substantial conformance results in effectively deleting or modifying the mitigation measure, the Director of Planning shall provide a written justification supported by substantial evidence as to why the mitigation measure, in whole or in part, is no longer needed and its effective deletion or modification will not result in a new significant impact or a more severe impact to a previously identified significant impact.

If the Project is not in substantial conformance to the adopted mitigation measures or MMP, a modification or deletion shall be treated as a new discretionary action under CEQA Guidelines, Section 15162(c) and will require preparation of an addendum or subsequent CEQA clearance. Under this process, the modification or deletion of a mitigation measure shall not require a Tract Map Modification unless the Director of Planning also finds that the change to the mitigation measures results in a substantial change to the Project or the non-environmental conditions of approval.

D. Administrative Conditions

10. **Approval, Verification and Submittals.** Copies of any approvals, guarantees or verification of consultations, review or approval, plans, etc., as may be required by the subject conditions, shall be provided to the Planning Department for placement in the subject file.
11. **Code Compliance.** Area, height and use regulations of the zone classification of the subject property shall be complied with, except where herein conditions are more restrictive.
12. **Covenant.** Prior to the issuance of any permits relative to this matter, an agreement concerning all the information contained in these conditions shall be recorded in the County Recorder's Office. The agreement shall run with the land and shall be binding on any subsequent property owners, heirs or assign. The agreement must be submitted to the Planning Department for approval before being recorded. After recordation, a copy bearing the Recorder's number and date shall be provided to the Planning Department for attachment to the file.
13. **Definition.** Any agencies, public officials or legislation referenced in these conditions shall mean those agencies, public officials, legislation or their successors, designees or amendment to any legislation.
14. **Enforcement.** Compliance with these conditions and the intent of these conditions shall be to the satisfaction of the Planning Department and any designated agency, or the agency's successor and in accordance with any stated laws or regulations, or any amendments thereto.
15. **Building Plans.** Page 1 of the grants and all the conditions of approval shall be printed on the building plans submitted to the Department of City Planning and the Department of Building and Safety.
16. **Project Plan Modifications.** Any corrections and/or modifications to the Project plans made subsequent to this grant that are deemed necessary by the Department of Building and Safety,

Housing Department, or other Agency for Code compliance, and which involve a change in site plan, floor area, parking, building height, yards or setbacks, building separations, or lot coverage, shall require a referral of the revised plans back to the Department of City Planning for additional review and final sign-off prior to the issuance of any building permit in connection with said plans. This process may require additional review and/or action by the appropriate decision-making authority including the Director of Planning, City Planning Commission, Area Planning Commission, or Board.

17. Indemnification and Reimbursement of Litigation Costs. The Applicant shall do all of the following:

- (i) Defend, indemnify and hold harmless the City from any and all actions against the City relating to or arising out of, in whole or in part, the City's processing and approval of this entitlement, including but not limited to, an action to attack, challenge, set aside, void, or otherwise modify or annul the approval of the entitlement, the environmental review of the entitlement, or the approval of subsequent permit decisions, or to claim personal property damage, including from inverse condemnation or any other constitutional claim.
- (ii) Reimburse the City for any and all costs incurred in defense of an action related to or arising out of, in whole or in part, the City's processing and approval of the entitlement, including but not limited to payment of all court costs and attorney's fees, costs of any judgments or awards against the City (including an award of attorney's fees), damages, and/or settlement costs.
- (iii) Submit an initial deposit for the City's litigation costs to the City within 10 days' notice of the City tendering defense to the Applicant and requesting a deposit. The initial deposit shall be in an amount set by the City Attorney's Office, in its sole discretion, based on the nature and scope of action, but in no event shall the initial deposit be less than \$50,000. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).
- (iv) Submit supplemental deposits upon notice by the City. Supplemental deposits may be required in an increased amount from the initial deposit if found necessary by the City to protect the City's interests. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).
- (v) If the City determines it necessary to protect the City's interest, execute an indemnity and reimbursement agreement with the City under terms consistent with the requirements of this condition.

The City shall notify the applicant within a reasonable period of time of its receipt of any action and the City shall cooperate in the defense. If the City fails to notify the applicant of any claim, action, or proceeding in a reasonable time, or if the City fails to reasonably cooperate in the defense, the applicant shall not thereafter be responsible to defend, indemnify or hold harmless the City.

The City shall have the sole right to choose its counsel, including the City Attorney's office or outside counsel. At its sole discretion, the City may participate at its own expense in the defense of any action, but such participation shall not relieve the applicant of any obligation imposed by this condition. In the event the Applicant fails to comply with this condition, in whole or in part, the City may withdraw its defense of the action, void its approval of the entitlement, or take any other action. The City retains the right to make all decisions with respect to its representations in any legal proceeding, including its inherent right to abandon or settle litigation.

For purposes of this condition, the following definitions apply:

“City” shall be defined to include the City, its agents, officers, boards, commissions, committees, employees, and volunteers.

“Action” shall be defined to include suits, proceedings (including those held under alternative dispute resolution procedures), claims, or lawsuits. Actions includes actions, as defined herein, alleging failure to comply with any federal, state or local law.

Nothing in the definitions included in this paragraph are intended to limit the rights of the City or the obligations of the Applicant otherwise created by this condition.

FINDINGS

ENTITLEMENT FINDINGS

PROJECT PERMIT COMPLIANCE REVIEW

Project Permit Compliance Review for compliance with the Alameda District Specific Plan.

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

As demonstrated below, the Project complies with applicable regulations, findings, standards and provisions of the Specific Plan.

Specific Plan Maximum Floor Area

The project complies with the Maximum Permitted Floor Area permitted by the Alameda District Specific Plan. The Specific Plan stipulates the maximum permitted floor area that can be developed in the specific plan area, to ensure compliance with the Specific Plan's certified EIR. The Specific Plan area is subdivided into two sites, the Terminal Annex site and the Union Station site, each of which is allotted a maximum permitted floor area that may be developed over two phases. The Phase I Cap for the Terminal Annex site is 1,393,700 square feet. The Terminal Annex Site is currently developed with 650,125 square feet of floor area that includes 471,004 square feet in the Terminal Annex building, 139,703 square feet in the California Endowment center, and 39,418 square feet in the Postal Service Carrier Annex building. The project proposes 179,900 square feet of new floor area for a total of 830,025 square feet of floor area on the Terminal Annex site, well below the Phase I cap of 1,393,700 square feet.

Height/Floor Area Ratio

Section 7.B of the ADSP provides that "Each lot within the Specific Plan area includes a Height/Floor Area Ratio (Height/FAR) District designation. These Height/FAR Districts and their boundaries are shown on Map 5 by a combination of Zone Symbols and Height/FAR District number markings." Map 5 includes the project site within the boundary with a zoning of ADP-400/4.2 which permits a height of 400 feet and a 4.2:1 floor area ratio. The maximum height of the new data center building is 93 feet in height.

The Terminal Annex building will be located on a parcel with a lot area of approximately of 194,432 square feet which permits a total floor area of 816,614 square feet. The Terminal Annex building contains 471,004 square feet for a 2.42:1 floor area ratio. The proposed new data center building is located on a parcel with a lot area of approximately of 160,268 square feet which permit a total floor area of 673,125 square feet. The new data center building contains 179,900 square feet for a 1.12:1 floor area ratio.

Permitted Uses

The ADSP permits uses allowed in the C2 Zone as set forth in the Los Angeles Municipal Code. The City's 2016 published Use List permits "Computer Server Equipment Rooms" in the C2 Zone.

Urban Design/Architecture

The proposed building is sited adjacent to the historic Terminal Annex Building yet separated to allow each to come to ground with a pedestrian view corridor between the two. A single project entry is marked by a steel canopy attached to the new building but not touching the historic structure. A small landscaped entry plaza at the top of a set of common stairs directs the visitor to the right at one of the original entries to the historic building. Once through security, the visitor may pass again through this plaza and view corridor to the entry to the new building. The proposed project is similar in mass to the historic structure, large and rectangular, similar in height although smaller in size. A continuous band of landscaping along Bauchet Street, which connects the historic and new buildings, is designed to unify the property and pedestrian perimeter. At the first-floor height, building materials are a combination of neutral grey board-formed concrete and cement fiber panels creating a compatibility with the neutral palette of the existing building. The exterior architecture on the upper floors is composed of formed metal panels which will provide shadows and articulation on the building skin much like the Mission style details do on the Terminal Annex Building. Vertical metal blades break up the length of the new building façade, creating a rhythm much as the arches and piers do on the historic building.

Parking Regulations

The Specific Plan requires 1.1 spaces per 1,000 square feet of floor area for Non-residential uses. The Project requests approval of an Exception from this standard to permit reduced parking the data center use given that the actual demand for this use is substantially lower. The proposed use is as a data center, where the floor space is occupied largely by computers and telecommunications equipment, with relatively few workers required to maintain and service the equipment.

As such, the project substantially complies with the applicable regulations, findings, standards and provisions of the specific plan.

- 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.**

An Addendum to the Environmental Impact Report (EIR) for the Alameda District Specific Plan that was certified in 1996 Plan was prepared for the data center project that analyzed and discloses the environmental effects that might reasonably result from proposed changes to development under the Specific Plan approved in 1996. As demonstrated in the Addendum, the project would not substantially increase the severity of the previously identified impacts in the Specific Plan EIR, and no new significant impacts would occur with implementation of the data center project. The applicable mitigation measures in the EIR would be required to be implemented by the data center project and no new additional mitigation measures are necessary.

Based on the foregoing, the Area Planning Commission has determined that substantial changes resulting in new significant effects or a substantial increase in the severity of previously identified significant effects in the Specific Plan EIR would not occur with the data center project, substantial changes with respect to the circumstances under which the project is undertaken resulting in new significant effects or a substantial increase in the severity of previously identified significant effects in the Specific Plan EIR would not occur, and new information of substantial importance with respect to this environmental resource resulting in new significant effects or a substantial increase in the severity of previously identified effects in the Specific Plan EIR has not been identified. Therefore, a supplemental EIR is not required under CEQA. As such, 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.

SPECIFIC PLAN EXCEPTION

- 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.**

The project proposes the construction of a new 179,900-square-foot data center building that would house computer servers and supporting equipment for private clients. The new building would complement the existing use of the Terminal Annex building located on the site which is also owned and operated by the applicant and predominately used for data storage except for a small 12,000 square foot Post Office store. The project proposes to provide 208 parking spaces with 84 surface spaces and 124 spaces located within a proposed new four-story parking structure that would be located adjacent to the new data center building. These spaces would provide parking for both the proposed new data center building and the uses in the Terminal Annex building.

Section 11.E.4 of the Specific Plan requires 1.1 parking spaces per 1,000 square feet for all non-residential uses which would require 198 parking spaces for the new building and the existing Terminal Annex building requires 276 spaces for a total of 474 required spaces. In 2002, the Central Area Planning Commission approved Case APCC-2002-1745-SPE and granted a Specific Plan Exception to permit reduced parking for the telecommunications use in the Terminal Annex building and required parking based on the "Warehouse" rate in Los Angeles Municipal Code Section 12.21.A.4(c)(1) of one space per 500 square feet for the first 10,000 square feet and one space per 5,000 square feet for the additional square footage. The approval also required parking for the post office use in compliance with Section 11.E.4 of the Specific Plan and mandated that no less than 276 parking spaces shall be provided. At the time of this approval, only approximately 52 percent of the Terminal Annex building was occupied by telecommunication uses whereas now approximately 97.5 percent is occupied telecommunication uses with 12,000 square feet occupied by the Post Office. Therefore, 276 parking spaces currently required are substantially greater than the demand generated by the data center uses.

Data centers are almost exclusively occupied by telecommunications switching and computer equipment and typically have very few employees present at the site at any one time. Those few employees who are present are there primarily for operating, maintaining and servicing the equipment. There are no typically no guest visitors to data centers. A parking demand analysis

prepared by Gibson Transportation Consultation, Inc. concluded that the peak parking demand for all the uses (including the post office) would be 105 parking spaces during the week and 79 parking spaces on the weekend. Therefore, the proposed 208 spaces more than satisfies projected demand for the site uses. Based on the warehouse rate for the data center uses and the Specific Plan rate for the post office use, approximately 185 spaces would be required. Thus, the proposed 208 spaces would satisfy the required parking under the proposed exception to allow the data center uses to park using the City's warehouse rate.

The strict application of the non-residential project parking ratio contained in the Alameda District Specific Plan (1.1 spaces per 1,000 square feet of floor area) to the telecom uses of the subject site would result in practical difficulties and unnecessary hardships to the applicant by necessitating the construction of unnecessary additional on-site parking facilities where there is little likelihood or evidence that actual demand exists to comply with this parking standard. Instead, the Specific Plan encourages rational and efficient development of parking by providing for shared use of parking and flexibility in its location (Section 11.E.3) and by permitting the Director to authorize a reduction of the required parking ratio for nonresidential projects if it is found that adequate parking will be provided after the reduction. Therefore, 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.

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.

The project is located within the Alameda District Specific Plan, adopted by the City Council in 1996, to facilitate the redevelopment of the Union Station and Terminal Annex sites that comprise the Specific Plan area. The Specific Plan contemplated development of the Terminal Annex site and the Terminal Annex building primarily with government and commercial office uses where the Specific Plan's parking ratio of 1.1 spaces per 1,000 square feet for all non-residential uses was reasonable. However, to date, the office market for the Terminal Annex site has not materialized. The Terminal Annex building was the United States Post Office's central mail processing facility for Los Angeles until 1989 and then was mostly vacant for several years until reused for telecommunication uses over the past decade. Although the Specific Plan permits the data center use, the Specific Plan's one-size-fits-all commercial parking requirement does not envision such uses with substantially less parking demand. As such, 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.

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.

The applicant's request to apply the "Warehouse" ratio for the new data center building is the same parking rate as permitted by the Area Planning Commission for data storage uses in the Terminal Annex building located on the same site under ownership of the applicant. In 2002, the Central Area Planning Commission approved Case APCC-2002-1745-SPE and granted a Specific Plan Exception to permit reduced parking for the telecommunications uses located in the

Terminal Annex building and required parking based on the "Warehouse" rate in Los Angeles Municipal Code Section 12.21.A.4(c)(1) of one space per 500 square feet for the first 10,000 square feet and one space per 5,000 square feet for the additional square footage. The approval also required parking for the post office use in compliance with Section 11.E.4 of the Specific Plan and mandated that no less than 276 parking spaces shall be provided. At the time of this approval, only approximately 52 percent of the Terminal Annex building was occupied by telecommunication uses whereas now approximately 97.5 percent is occupied telecommunication uses with 12,000 square feet occupied by the Post Office. Therefore, 276 parking spaces currently required are substantially greater than the demand generated by the data center uses. A parking demand analysis prepared by Gibson Transportation Consultation, Inc. concluded that the peak parking demand for all the uses (including the post office) would be 105 parking spaces during the week and 79 parking spaces on the weekend.

Because other properties in the Specific Plan area are devoted to uses which generate the need for the parking required under the Specific Plan, they are able to economically develop such parking and recover the cost through leases of their projects. Since the telecommunications use to which this facility is primarily devoted does not generate that need, it cannot lease the unneeded parking spaces, and therefore suffers unnecessary hardship if required to develop additional parking for which there is no economic or practical use, and no ability to recover the cost of providing it through rent. Therefore, 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.

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.

The requested exception will adjust the parking requirements to a level consistent with the use and demand of the project, and still more than adequate to provide on-site parking for all vehicles of those occupying and visiting the data center. The requested exception will adjust the parking requirement for the proposed telecom use to comply with the citywide warehouse parking standard set forth in Section 12.21 A. 4 (c)(l) of the Municipal Code. This will be adequate to provide sufficient on-site parking without detriment to the surrounding area, while other office and retail uses of the site will still comply with the 1.1 spaces per 1,000 square feet of floor area required for those uses by the Specific Plan. As such, 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.

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.

Granting the exception is consistent with the Specific Plan's and General Plan's goals of efficient land use and rational, efficient flexibility in providing parking as described above. The property is located to be planned and redeveloped in a more efficient and rational manner, with possible use of shared parking or development of parking structures to provide for actual parking need. The parking exception requested would provide more parking than has been analyzed to be used by the proposed uses even under the maximum demand situation. The requested exception is

consistent with the encouraged flexibility regarding parking that is inherent in Section 11.E of the Specific Plan (e.g., shared parking and reduced parking).

The Project will not produce the need for anywhere near the parking required under the Specific Plan because of the nature of the telecommunications use in which very few workers occupy the space, which is largely occupied by racks of telecom equipment and computers. These tenant's premises are almost exclusively occupied by telecommunications switching and computer equipment and typically have very few employees--and no visitors--present at the site at any one time. Those few employees who are present are there primarily for operating, maintaining and servicing the equipment.

For this reason, actual need for parking spaces at this facility will be substantially lower than the Specific Plan's minimum 1.1/1,000 requirement, which was adopted in anticipation of typical office uses. Since substantial portions of the telecommunications uses are much more analogous to a warehouse use, the applicant is requesting an exception permitting the parking requirement for those areas to be reduced to the City's standard parking requirement for warehouse uses, *i.e.*, 1 space per 500 square feet for the first 10,000 square feet, and 1 space per 5,000 square feet above the first 10,000 square feet. As such, 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.

CEQA Findings

An Addendum to the Environmental Impact Report (EIR), dated July 5, 2018, for the Alameda District Specific Plan that was certified on June 18, 1996 was prepared for the data center project that analyzed and discloses the environmental effects that might reasonably result from proposed changes to development under the Specific Plan approved in 1996. At the time there was no separate Environmental case number assigned to an EIR; the original EIR is identified as being associated with Case No. CPC-1993-442-SP, State Clearinghouse No. 1994031006. As demonstrated in the Addendum, the project would not substantially increase the severity of the previously identified impacts in the Specific Plan EIR, and no new significant impacts would occur with implementation of the data center project. The applicable mitigation measures in the EIR would be required to be implemented by the data center project and no new additional mitigation measures are necessary.

Based on the foregoing, the Area Planning Commission has determined that substantial changes resulting in new significant effects or a substantial increase in the severity of previously identified significant effects in the Specific Plan EIR would not occur with the data center project, substantial changes with respect to the circumstances under which the project is undertaken resulting in new significant effects or a substantial increase in the severity of previously identified significant effects in the Specific Plan EIR would not occur, and new information of substantial importance with respect to this environmental resource resulting in new significant effects or a substantial increase in the severity of previously identified effects in the Specific Plan EIR has not been identified. Therefore, a supplemental EIR is not required under CEQA and the addendum to the EIR is the appropriate CEQA clearance for the proposed project.

PUBLIC HEARING AND COMMUNICATIONS

A public hearing was conducted on August 21, 2018 at Los Angeles City Hall by Department of City Planning staff on behalf of the Los Angeles Central Area Planning Commission. At the public hearing, the Project Applicant's team made a presentation and responded to several staff questions concerning the details of the project. Two other individuals attended the hearing but did not offer any comment.

One comment letter from the public was received on July 24, 2018, from the Historic Cultural Neighborhood Council expressing their support for the project, noting that the design had been improved by a revision from an earlier design upon which the Neighborhood Council had provided feedback. No other feedback from the public was received.

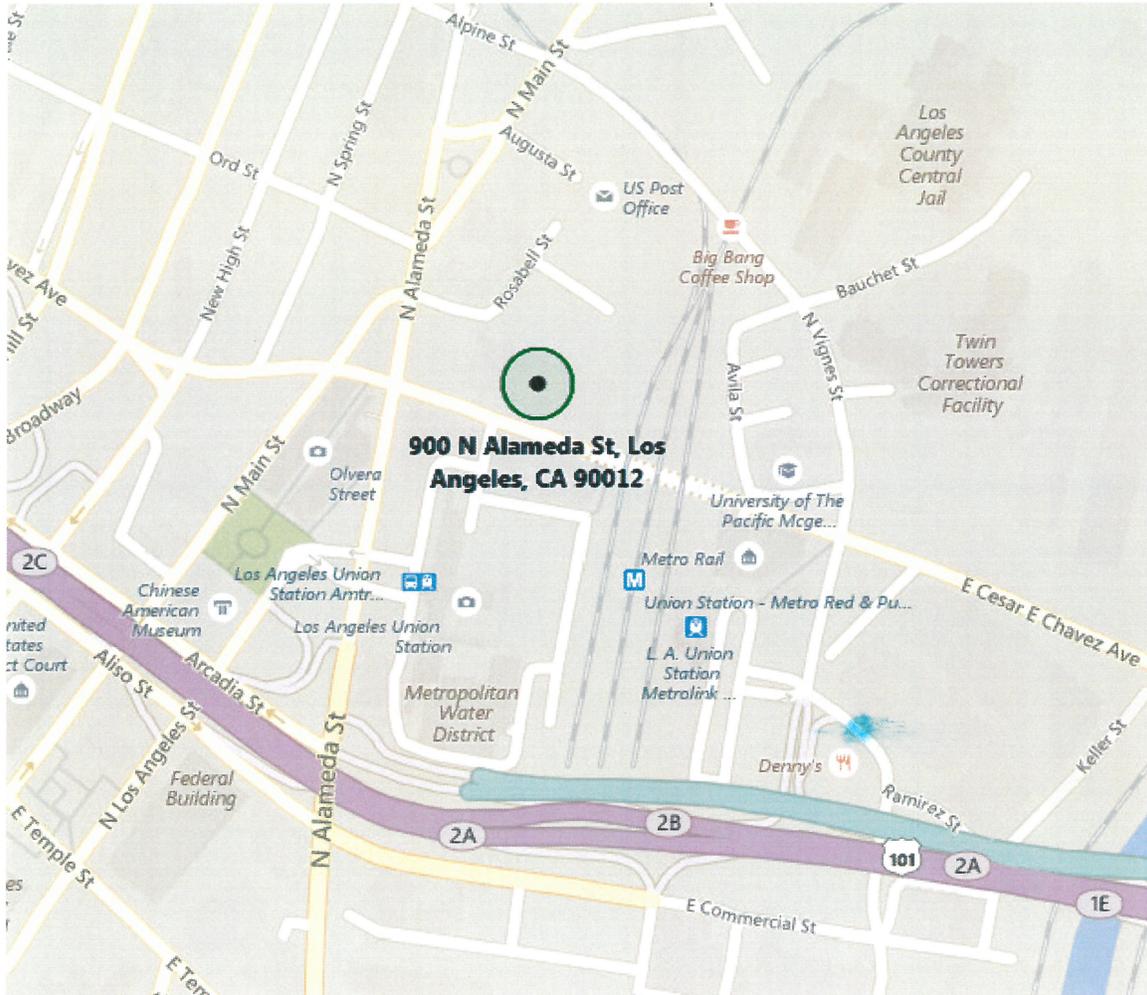
The Project Applicant sent a memo to the Department on August 27, 2018 explaining factors in the decisions on where to locate data centers such as the Project.

EXHIBIT A – MAPS

A1 – Vicinity Map

A2 – Radius Map

Vicinity Map



Address: 900 N. ALAMEDA STREET, LOS ANGELES

APCC2017-2421



17-242



SPECIFIC PLAN EXCEPTION & PPC

QMS Quality Mapping Service
 14549 Archwood St. Suite 301
 Van Nuys, California 91405
 Phone (818) 997-7949 - Fax (818) 997-0351
 qmapping@quesqms.com

THOMAS BROTHERS
 Page: 634 Grid: G,H-3
LEGAL
 "SEE APPLICATIONS"
A.P.N.
 5409-015-(015-017,021)
CD: 14
CT: 2060.20
PA: CENTRAL CITY
USES: FIELD
CONTACT: ARMBURSTER GOLDSMITH DELVAC

SITE ADDRESS
 900 ALAMEDA ST.
CASE NO:
SCALE: 1"=100'
D.M.: 133.5A215,123.5A217
 132A215,132A217
PHONE: 310-209-8800

DATE: 05-25-17
 Update: _____
NET AC: 8.44 +/-
 NORTH
 QMS:17-242

DRAWN BY:

EXHIBIT B – PROJECT PLANS

Site Plan

Floor Plans

Elevation Plan

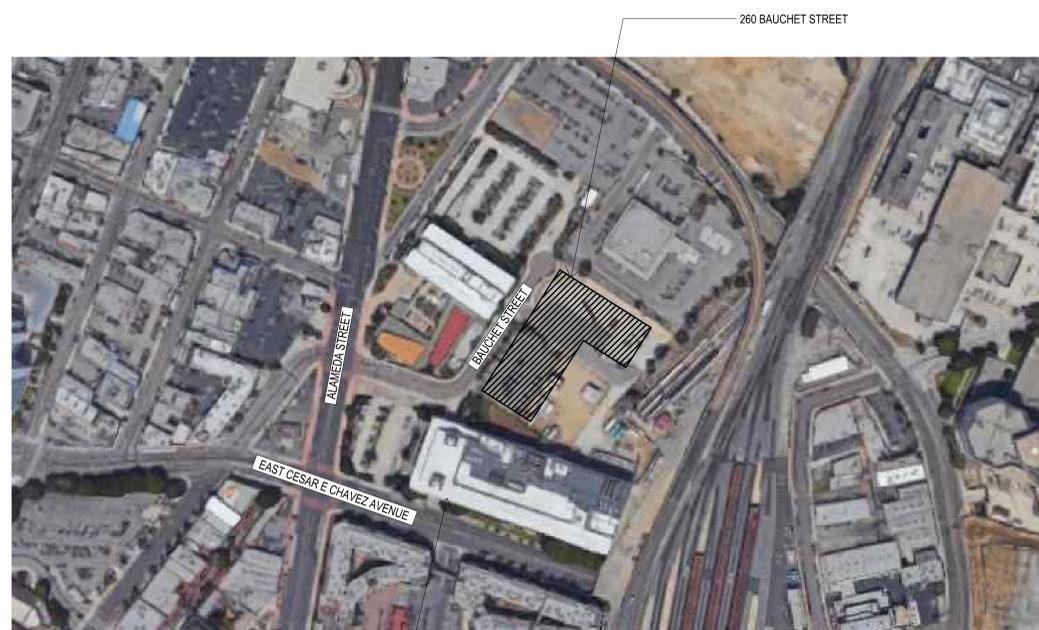
Landscape Plan



CORESITE

900 N. ALAMEDA STREET
LOS ANGELES, CA 90012

ISSUED WITH PLANNING AND NEIGHBORHOOD COUNCIL COMMENTS
SEPTEMBER 7, 2018



900 N. ALAMEDA STREET (EXISTING CORESITE LA2 BUILDING)

VICINITY MAP
scale: NTS



ISSUE HISTORY:		PRE-PLANNING SUBMITTAL 05-03-2017	LOT TIE 05-17-2017	PLANNING SUBMITTAL 05-28-2017	PLANNING COMMENTS 09-07-2018													
GENERAL																		
T001	TITLE SHEET	•	R	R	R													
SP101	PLOT PLAN	•	R	R	R													
SP102	SITE PLAN-DEMOLITION WORK	•	NC	NC	NC													
A101	1st PROPOSED FLOOR PLAN	•	R	R	R													
A102	2nd, 3RD AND 4TH FLOOR PROPOSED FLOOR PLAN	•	R	R	R													
A103	PROPOSED ROOF PLAN	•	R	R	R													
A201	ELEVATIONS	•	R	R	R													
A202	ELEVATIONS	•	R	R	R													
A301	SECTIONS	•	R	R	R													
A501	RENDERINGS	•	R	R	R													

LANDSCAPE																		
L1	PRELIMINARY LANDSCAPE PLAN																	

LEGEND:

- INCLUDED IN ISSUE
- R REVISED SHEET

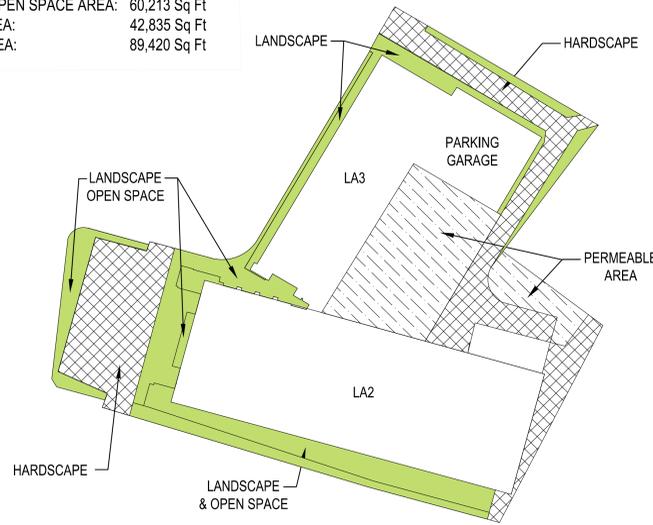
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DATE: 09/27/17
SCALE: NTS
DRAWN BY: [Name]
CHECKED BY: [Name]
DATE: 09/27/17
SCALE: NTS
DRAWN BY: [Name]
CHECKED BY: [Name]

PROJECT:
**CORESITE
LA3
260 BOUCHET ST**
PROJECT NUMBER: 16-0010
TITLE SHEET

T001

TOTAL LANDSCAPE & OPEN SPACE AREA: 60,213 Sq Ft
 TOTAL PERMEABLE AREA: 42,835 Sq Ft
 TOTAL HARDSCAPE AREA: 89,420 Sq Ft



2 LANDSCAPE & OPEN SPACE
 scale: NTS



1 SITE PLAN - PROPOSED
 scale: 1/32" = 1'-0"



TRACT: KERCKHOFF CUZNER AND CO. TRACT
 APN: 5409-015-015 (Parcel A of Property I)
 5409-015-016 (Parcel B of Property I)
 5409-015-017 (Parcel C of Property I)
 5409-015-021 (Property II)
 ZONING: ADP-RIO (Alameda District Specific Plan)
 USE: Data Center (Computer Server Equip. Room)

LOT COVERAGE:

	Lot Area	Bldg. Area	%
900 N. ALAMEDA :	194,432 SF	98,880 SF	51%
200 BAUCHET :	160,268 SF	64,250 SF	40%

FAR CALCULATION:

	Sq Ft	Lot Area	FAR
900 N. ALAMEDA :	471,004 SF	194,432 SF	2.4
200 BAUCHET :	179,900 SF	160,268 SF	1.1

PARKING CALCULATION:

900 N. ALAMEDA STREET (EXISTING BUILDING)

PROPOSED

900 N. Alameda: 471,004 SF total

Post Office, 12,000 SF
 1.1 per 1000 = 13 Spaces

Data Center: 459,004
 1 per 500 (1st 10,000 sq ft) + 1 per 5,000
 20 + 90 = 110 Spaces

Total: 123 Spaces

260 BAUCHET STREET (NEW BUILDING)

PROPOSED

200 Bauchet: 179,600 SF total

1 per 500 (1st 10,000 sq ft) + 1 per 5,000
 20 + 34 = 54 Spaces

Total: 54 Spaces

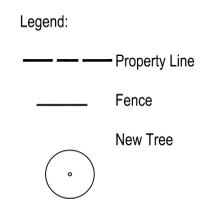
TOTAL PROPOSED PARKING SPACES

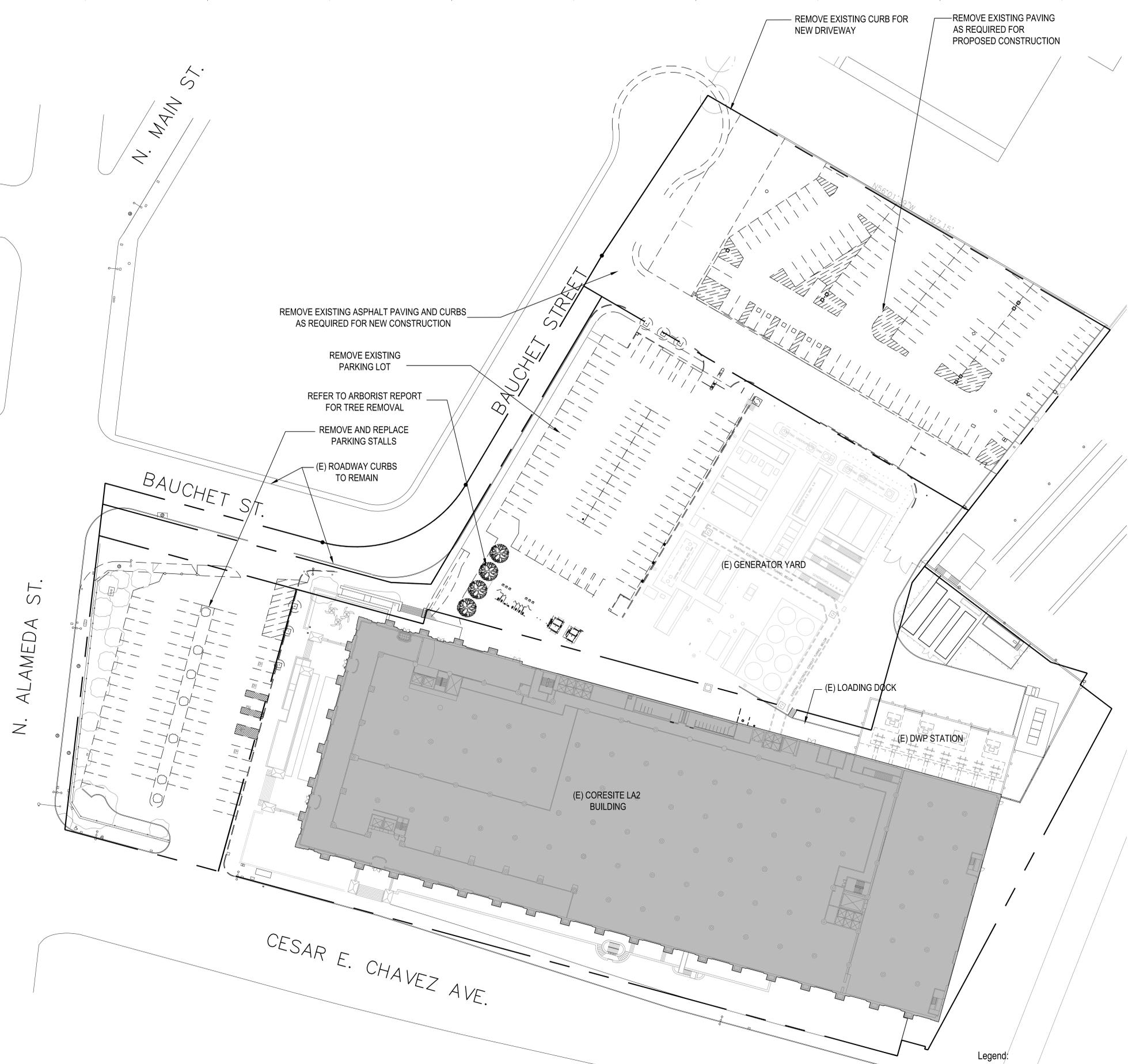
123 + 54 = 177 Spaces

PARKING PROVIDED:

Surface Standard Spaces: 84 Spaces
 New Parking Structure Spaces: 124 Spaces

Total Provided: 208 Spaces





REMOVE EXISTING ASPHALT PAVING AND CURBS AS REQUIRED FOR NEW CONSTRUCTION

REMOVE EXISTING PARKING LOT

REFER TO ARBORIST REPORT FOR TREE REMOVAL

REMOVE AND REPLACE PARKING STALLS

(E) ROADWAY CURBS TO REMAIN

REMOVE EXISTING CURB FOR NEW DRIVEWAY

REMOVE EXISTING PAVING AS REQUIRED FOR PROPOSED CONSTRUCTION

(E) GENERATOR YARD

(E) LOADING DOCK

(E) DWP STATION

(E) CORESITE LA2 BUILDING

N. ALAMEDA ST.

N. MAIN ST.

BAUCHET STREET

BAUCHET ST.

CESAR E. CHAVEZ AVE.

1 SITE PLAN - DEMOLITION WORK
scale: 1"=32'-0"



- Legend:
- Property Line
 - - - Setback Line
 - Fence

NO.	DATE	DESCRIPTION
1	08/27/18	Planning and Neighborhood Council Comments
2	09/27/17	Final
3	08/17/17	Revisions

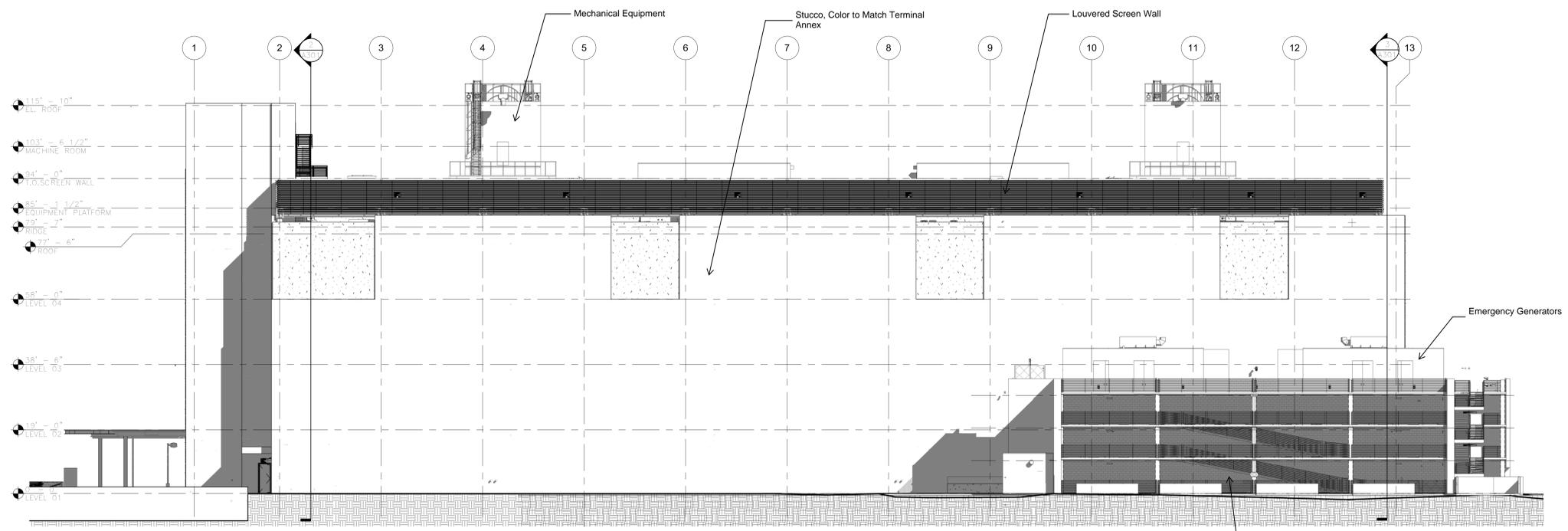
OWNER: CORESITE LA3
PROJECT: CORESITE LA3
260 BOUCHET ST
LOS ANGELES, CA 90038
DATE: 08/27/18
SCALE: 1"=32'-0"
DRAWN BY: [Name]
CHECKED BY: [Name]
APPROVED BY: [Name]
PROJECT MANAGER: [Name]
PROJECT NUMBER: 16-0010
SHEET NUMBER: SP102
SHEET TOTAL: 102
© dotterweich carlson mehner design, inc. 2018

CORESITE LA3
260 BOUCHET ST

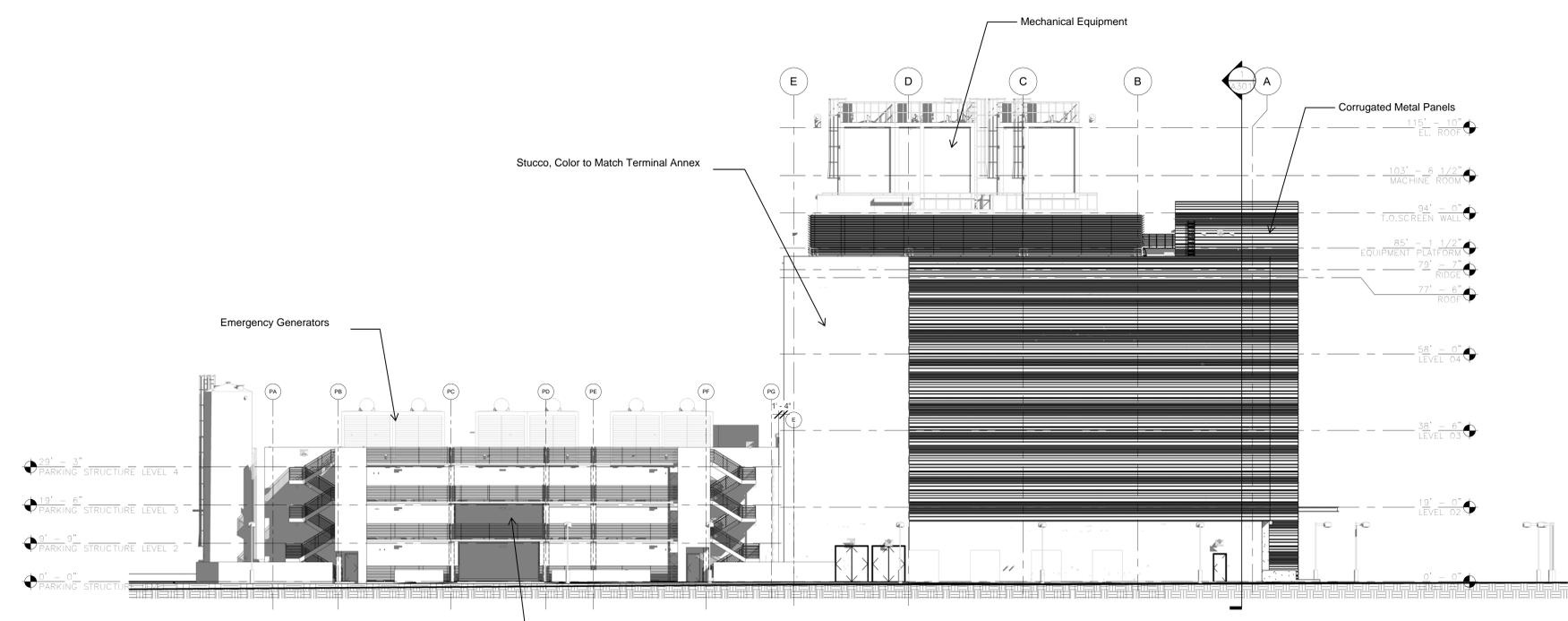
PROJECT NUMBER: 16-0010

SITE PLAN DEMOLITION

SP102



1 EAST ELEVATION
scale: 1/16"=1'-0"



2 NORTH ELEVATION
scale: 1/16"=1'-0"

NO.	DATE	DESCRIPTION
1	08/27/18	Permitting and Neighborhood Council Comments
2	09/27/17	Revisions
3	04/11/17	Revisions

NOTICE: THESE DRAWINGS AND ANY INFORMATION CONTAINED HEREIN ARE THE PROPERTY OF DCM AND ARE TO BE USED ONLY FOR THE PROJECT AND SITE SPECIFICALLY IDENTIFIED HEREIN. NO PART OF THESE DRAWINGS OR ANY INFORMATION CONTAINED HEREIN IS TO BE REPRODUCED, COPIED, OR TRANSMITTED IN ANY FORM OR BY ANY MEANS, ELECTRONIC OR MECHANICAL, INCLUDING PHOTOCOPYING, RECORDING, OR BY ANY INFORMATION STORAGE AND RETRIEVAL SYSTEM, WITHOUT THE WRITTEN PERMISSION OF DCM. THE USER OF THESE DRAWINGS SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY PERMITS AND APPROVALS FROM ALL APPLICABLE AGENCIES AND AUTHORITIES. THE USER OF THESE DRAWINGS SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY PERMITS AND APPROVALS FROM ALL APPLICABLE AGENCIES AND AUTHORITIES. THE USER OF THESE DRAWINGS SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY PERMITS AND APPROVALS FROM ALL APPLICABLE AGENCIES AND AUTHORITIES.

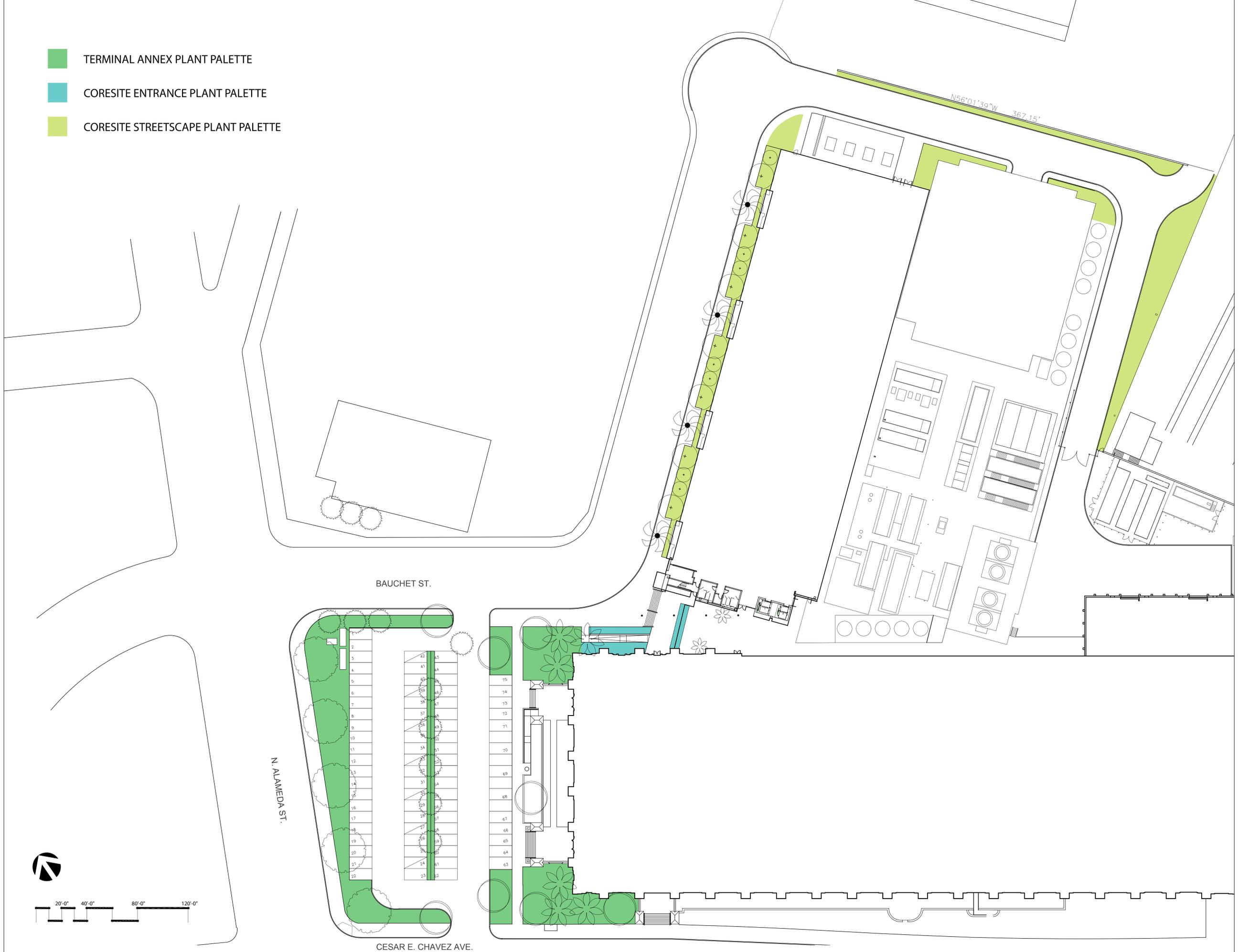
PROJECT: **CORESITE LA3**
260 BOUCHET ST

PROJECT NUMBER: 16-0010

ELEVATIONS

A202

- TERMINAL ANNEX PLANT PALETTE
- CORESITE ENTRANCE PLANT PALETTE
- CORESITE STREETScape PLANT PALETTE



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 Email: INFO@ELYSIANLANDSCAPES.COM

WWW.ELYSIANLANDSCAPES.COM

APPROVAL:

ISSUE DATES:

- 2018-8-14 CONCEPTUAL LANDSCAPE PLAN
-
-
-
-
-
-
-
-
-

PROJECT: coresite LA3

ADDRESS: 900 Alameda Street
 Los Angeles, CA 90012

NOTES:
 ALL DIMENSIONS AND GRADING ELEVATIONS
 TO BE VERIFIED IN THE FIELD
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SCALE:

EXHIBIT C – ENVIRONMENTAL CLEARANCE

Addendum Dated July 5, 2018

to the Previously Certified Environmental Impact Report

for Case No. CPC-1993-442-SP

State Clearinghouse No. 1994031006

Certified June 18, 1996

The Addendum may be found at:

https://planning.lacity.org/eir/CoreSite_LA3/ADSP_EIR_Addendum.pdf

EXHIBIT D – MITIGATION MONITORING PLAN

**CoreSite LA3 Data Center
900 N. Alameda Street, Los Angeles, California, 90012**

Mitigation, Monitoring, and Reporting Program (MMRP)

City File No: ENV-2017-2422-EAF

Prepared for:

The City of Los Angeles
Department of City Planning

Prepared by:

Circlepoint
200 Webster Street, Suite 200
Oakland, CA 94607

June 2018

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Mitigation, Monitoring, and Reporting Program

<i>Environmental Factor</i>	<i>Mitigation Measures</i>	<i>Responsible Party</i>	<i>Timing</i>
Artificial Light	<p>K.1.1.a – Exterior lighting, including pedestrian lighting, shall be shielded to reduce the amount of direct lighting escaping the site</p> <p>K.1.1.b – Parking structures shall be designed so as to shield exterior areas from vehicle headlights and interior parking structure lighting, to the extent feasible</p> <p>K.1.1.c – Pole-mounted lighting fixtures on pedestrian paths will utilize cut-off technology to reduce glare</p> <p>K.1.1.d – Necessary building floodlighting will be shielded and designed to eliminate spillover glare.</p>	Project Applicant	Pre-Construction
Meteorology (Wind)	<p>F.2.1 – Should Phase I result in significant impacts to outdoor dining, seating, or similar stationary uses, the project shall incorporate wind screening measures such as shrubs, screens, and lattices. Wind screening should be designed to be most effective in reducing local wind speeds generated from southeast winds, the prevailing winds.</p>	Project Applicant	Pre-Construction, Construction
Air Quality	<p>F.1.1.a – Prior to issuance of a grading permit, the project proponent shall demonstrate to the City of Los Angeles the actions that will be taken to comply with SCAQMD Rule 402, which requires that there be no dust impacts offsite sufficient to cause a nuisance, and SCAQMD Rule 403, which restricts visible emissions from construction. Specific measures will include moistening soil prior to grading, daily watering of exposed surfaces or treating with soil conditioner to stabilize the soil; washing truck tires and covering loads of dirt transported offsite; cessation of grading during periods of high winds over 25 miles per hour, and paving, coating or seeding graded areas at the earliest possible time after soil disturbance.</p> <p>F.1.1.b – All construction equipment will be maintained in peak operating condition so as to reduce operational emissions.</p> <p>F.1.1.c – Equipment will use low-sulfur diesel fuel.</p> <p>F.1.1.d – Electric equipment will be used to the maximum extent feasible.</p> <p>F.1.1.e – Trucks will limit idling.</p> <p>F.1.1.f – To the maximum extent feasible, construction activities that affect traffic flow will be restricted to off-peak hours, i.e., between 7:00 P.M. and 6:00 A.M. and between 10:00 A.M. and 3:00 P.M.</p> <p>F.1.1.g – Contractors will be required to provide assistance to long term construction workers in finding carpools or alternative transportation.</p> <p>F.1.1.h – Haul truck routes and staging areas shall avoid residential streets, and to the extent feasible,</p>	Project Applicant, Contractor	Pre-construction, Construction

Environmental Factor	Mitigation Measures	Responsible Party	Timing
	<p>streets adjacent to local schools.</p> <p>F.1.1.i – Construction workers will be advised of protective apparatus to wear when there is a potential for exposure to odors or from asbestos or other toxics during demolition.</p> <p>F.1.1.j – Soil remediation programs shall be designed to minimize the release of air contaminants.</p> <p>F.1.1.k – Project design will include pre-coated or uncoated materials for exterior surfaces to the extent feasible.</p> <p>F.1.1.l – Project design will include low-emitting interior coatings to the maximum extent feasible.</p> <p>F.1.2.a – Project design will incorporate energy-saving features throughout the project, including low-emission water heaters, central water heating systems, and built-in energy efficient appliances.</p> <p>F.1.2.b – Parking and pedestrian areas will be planted with trees to insure shading and prevent heat buildup.</p> <p>F.1.2.c – Building managers to the greatest extent possible will assist local tenants [to] comply with SCAQMD Regulation XV, as applicable.</p>		
Archeological Resources, Paleontological Resources, and Historical Resources	<p>C.1.1.a - Prior to the initiation of construction, a written historical reconstruction of each specific location shall be conducted, utilizing maps, photographs, census data, etc. Such additional research should be conducted on a building-site-by-building-site basis, as development is proposed over an extended period of time and some areas are not proposed for new construction. A record of historical reconstruction should include information obtained from sources including, but not limited to, the following data: maps, property ownership, street locations, street addresses, directories, and census information. Historical reconstruction for the entire area is currently underway by the Chinese Historical Society of Southern California and by staff members of El Pueblo de los Angeles Historic Park. To the extent feasible, this work can be comparatively evaluated with the ADP area to contribute to the historical construction for the project site. Once a written historical reconstruction has been completed for the specific construction location, the archival mitigation requirement should be considered as satisfied; and all following mitigation steps, as necessary, lie within the realm of field work.</p> <p>C.1.1.b – Archaeological monitoring of all subsurface excavation shall be required within the potentially significant historic and prehistoric stratigraphic levels to ensure that no cultural resources are buried under existing development contained within the project property. Below these levels, once sterile soil is encountered and it can be determined that no stratigraphically lower levels masked by thin sterile deposits exist, archaeological monitoring should not be necessary. If such monitoring of the cultural levels (i.e., the fill brought in to cover the old pre-construction surface, the surface itself, and any historic and/or prehistoric cultural levels below it) indicates the absence of significant</p>	Contractor, Professionally Qualified Staff	Pre-Construction, Construction

<i>Environmental Factor</i>	<i>Mitigation Measures</i>	<i>Responsible Party</i>	<i>Timing</i>
	<p>archaeological deposits, then mitigation of adverse impacts has been achieved in that location, and no additional archaeological work is necessary.</p> <p>C.1.1.c - In the event that potentially significant cultural resources are encountered during the course of construction, all development must cease in the immediate area of the cultural resources until the cultural resources are properly assessed and subsequent recommendations are determined by a qualified archaeologist. This measure is designed to prevent any cultural resources from being damaged and/or destroyed during project development. In addition, the designated depository, as well as the applicant's archaeologist, must be notified immediately if subsurface cultural materials are discovered. If monitoring reveals problematic archaeological deposits, then additional mitigation steps may be required. Such steps include test excavations to reveal whether such deposits are significant or insignificant. If they are determined to be of little or no significance, then no additional archaeological work is necessary. However, if such deposits are determined to be significant, then salvage excavation of a representative sample might be required. Such decisions can only be made on a case-by-case basis depending upon the specific stratigraphic situation discovered for each proposed construction location.</p> <p>C.1.1.d – Demolition of existing structures or pavements and controlled removal of at least 10, and possibly up to 15, vertical feet of overburden may be necessary prior to actual initiation of any intensive archaeological mitigation work. This is recommended over costly and redundant archaeological test excavations via deep exploratory trenching at the outset, which could miss deeply buried deposits of limited horizontal extent. At minimum, a physical inspection of any and all historic or prehistoric archaeological deposits must be made prior to a determination of significance. Badly disturbed deposits may require test excavation for determination of significance. Such inspection or testing can only be made if archaeological monitoring is conducted concomitantly with initial grading. Only if such deposits can be determined significant should they be mitigated through archeological salvage excavations.</p> <p>C.1.1.e – Artifacts determined to be prehistorically or historically significant should be preserved and provided to the designated depository for research purposes.</p> <p>C.2.1.a - Prior to any earth-moving activity in the ADP area, the applicant shall retain the services of a qualified vertebrate paleontologist approved to manage a paleontologic resource impact mitigation program. The contracted person or firm shall have experience in conducting similar programs in areas underlain by rock units containing large and small land mammal remains.</p> <p>C.2.1.b – The program manager shall prepare a treatment plan with a discovery clause to allow for the salvage and treatment of an unusually large or productive fossil occurrence that cannot be recovered and/or processed without diverting personnel from monitoring. The treatment plan shall</p>		

<i>Environmental Factor</i>	<i>Mitigation Measures</i>	<i>Responsible Party</i>	<i>Timing</i>
	<p>specify the procedures and costs involved with rock sample recovery, processing, and sorting; or large specimen recovery, preparation, and stabilization; and identification, cataloguing, curation, and storage of such an occurrence. The discovery clause shall specify when and how the treatment plan would be initiated.</p> <p>C.2.1.c - A field supervisor, in consultation with a qualified paleontologist, shall monitor excavation on a part-time basis once excavation has encountered the alluvium below the artificial fill. If fossil remains are uncovered by excavation, monitoring shall be increased during excavation.</p> <p>C.2.1.d – Monitoring shall consist of examining excavations and spoils for larger fossil remains, and test screening spoils for smaller fossil remains. If larger fossil remains are encountered by earth moving, the field supervisor shall have the authority to temporarily divert earth moving around the fossil site until the remains have been examined, their importance determined, the remains removed, if warranted, and earth moving allowed to proceed through the site. To ensure earth moving is not delayed, the field supervisor, if warranted, shall have the earth-moving contractor assist in moving the remains to an adjacent location for later transport to a museum or laboratory facility.</p> <p>C.2.1.e – The field supervisor shall instruct construction personnel on their responsibilities and the procedures to be implemented if fossil remains are encountered when the monitor is not onsite.</p> <p>C.2.1.f – If fossil remains are encountered, earth moving shall be diverted around the fossil site until the field supervisor or paleontologist has been called to the site and examined the remains, determined their importance, removed the remains, if warranted, and allowed earth moving to proceed through the site.</p> <p>C.2.1.g – If smaller fossil remains are found by test screening, the monitor shall flag the fossiliferous spoils to ensure they are not disturbed by earth moving, evaluate the spoils by additional test screening, and, if determined sufficiently productive, recover a sample (not to exceed 6,000 pounds) of the spoils or undisturbed sediment at the fossil site for processing. To ensure earth moving is not delayed, the monitor, if warranted, shall have the earth-moving contractor assist in moving the sample to an adjacent location for later transport to a museum or laboratory facility.</p> <p>C.2.1.h – Any fossil site discovered as the result of monitoring shall be plotted on a map of the ADP area.</p> <p>C.2.1.i – Following the completion of monitoring, any fossil remains or fossiliferous rock sample shall be provided to a museum or laboratory facility for processing, sorting, preparation, stabilization, identification, curation, and preparation of findings describing the scientific importance of any recovered fossil remains. The Specimens and associated geologic and geographic site data shall be placed in a museum collection for permanent storage.</p>		

Environmental Factor	Mitigation Measures	Responsible Party	Timing
	<p>C.3.1.b – All historic buildings and their settings shall be documented according to Historic America Building Survey (HABS) Standards. This documentation shall include large format photography and measured drawings showing all views including settings, plus significant exterior and interior architectural or construction details keyed to a map of the site. The photographs and plans prepared as mitigation should be submitted to the National Park Service for accession to the Library of Congress as part of the HABS collection and also submitted to the Los Angeles Conservancy and the Planning Department for inclusion in their architectural and cultural resource surveys.</p>		
Geologic Hazards	<p>H.1.1.a - For each project or structure within Phase I development, the applicant shall conform to all applicable provisions of the Los Angeles Municipal Code, including the revised (1992 as amended) Division 23, Section 2312 of the Building Code which sets forth regulations concerning proper earthquake design and engineering and requires dynamic analysis for structures that are over 160 feet in height. The information regarding ground motion and spectra response determined from the dynamics analysis shall be implemented in the seismic design of the buildings.</p> <p>H.1.1.b – Each project or structure within Phase I development shall conform to the criteria set forth in the 1990 Recommended Lateral Force Requirements and Commentary by the Structural Engineers Association of California.</p> <p>H.1.1.c - Each project or structure within Phase I development shall conform with the intent and recommendations of the City of Los Angeles Seismic Safety Plan. As adopted by the city in the General Plan, the Plan sets forth general planning policies for the City of Los Angeles concerning existing development, new development (e.g., prohibiting construction of buildings for human occupancy across surface fault traces, preparation of required geologic reports for projects located in designated study areas), critical facilities, emergency preparedness, and post-disaster recovery.</p> <p>H.1.2 – A project-specific geotechnical investigation shall be performed for each building site to evaluate the liquefaction, seismic settlement, and differential settlement of the artificial fill and natural soils underlying the specific building location. The study shall be prepared to the satisfaction of the Department of Building and Safety for the particular building site prior to issuance of a building permit.</p>	<p>Project Applicant, Contractor</p>	<p>Pre-Construction, Construction</p>
Grading	<p>H.2.1.a – Where there is sufficient space for sloped excavations, temporary cut slopes less than 30 feet in height shall be made at a 1.5:1 or 2:1 (horizontal to vertical) gradient for each project or structure within Phase I of the proposed project. However, the stability of the graded slopes shall be addressed when grading plans are completed for each project or structure. Vertical cuts deeper than four feet in height shall be avoided.</p> <p>H.2.1.b – Where sufficient space for sloped excavations is not available, shoring shall be used for each</p>	<p>Project Applicant, Contractor</p>	<p>Pre-Construction, Construction</p>

Environmental Factor	Mitigation Measures	Responsible Party	Timing
	<p>project or structure within Phase I of the proposed project. The shoring system may consist of soldier piles and lagging. Recommendations for the proper design of the shoring system shall be provided by a licensed geotechnical engineer.</p> <p>H.2.1.c – A soils and foundation study shall be performed for each building location to evaluate the stability of temporary or permanent grading excavations. The study shall be prepared to the satisfaction of the Dept. of Building and Safety as part of the project approval process and prior to issuance of a building permit for the particular location.</p> <p>H.2.1.d – During construction, all grading shall be carefully observed, mapped, and tested by the project geotechnical engineer. All grading shall be performed under the supervision of a licensed geotechnical engineer and/or soils engineer, in accordance with applicable provisions of the Municipal Code, to the reasonable satisfaction of the City Engineer and the Department of Building of Safety.</p> <p>H.2.1.e – The project shall be constructed in compliance with all applicable requirements of the California Construction and General Industry Safety Orders, the Occupational Safety and Health Act of 1970, and the Construction Safety Act.</p> <p>H.2.2.a – The soils and foundation study for each building location shall delineate areas containing deep fill soils. Construction of structures in these areas shall include appropriate design and construction mitigation measures, in accordance with the requirements of the Department of Building and Safety.</p> <p>H.2.2.b – If the depth of fill material within the building area is too excessive to make its removal and recompaction feasible, the proposed structures may be supported on pile foundations. The piles shall penetrate the existing fill soils to develop adequate capacity.</p> <p>H.2.2.c – Where the planned depth of excavation does not extend below the existing fill soils, the existing fill soils shall be removed and recompacted in accordance with the requirements of the Department of Building and Safety.</p>		
Risk of Upset	<p>J.1.a – If contaminated groundwater is encountered during construction, such contaminated groundwater shall be handled in a manner satisfactory to all public agencies with jurisdiction over such matters.</p> <p>J.1.b – The project site shall be properly secured to prevent access by the general public, thereby minimizing the possibility of exposure to contaminated groundwater.</p> <p>J.1.c – A Remediation Action Plan (RAP) will be developed and implemented for the remediation of the contaminated soil and groundwater at the Terminal Annex.</p> <p>J.2.a – If contaminated soil is encountered during project construction, such contaminated soil shall</p>	Contractor	Construction

Environmental Factor	Mitigation Measures	Responsible Party	Timing
	<p>be handled in a manner satisfactory to all public agencies with jurisdiction over such matters.</p> <p>J.2.b – The project site shall be properly secured to prevent access by the general public, thereby minimizing the exposure to contaminated soils.</p> <p>J.2.c – Refer to mitigation measure J.1.c.</p>		
Surface Water Runoff/ Hydrology	<p>I.1.a – To prevent erosion, protective measures (e.g., placement of sandbags around basins, construction of a berm to keep runoff from flowing into the construction site, or keeping motor vehicles at a safe distance from the edge of excavation) shall be implemented during construction.</p> <p>I.1.b – Stormwater discharges from the site shall meet, at a minimum, all applicable requirements of the State Regional Water Quality Control Board and NPDES permit requirements, and shall comply with implementation of these requirements through responsible City and County of Los Angeles agencies.</p> <p>I.1.c – A SWPPP shall be prepared and submitted for review and approval by the Bureau of Engineering, Stormwater Management Division, prior to issuance of a building permit. The SWPPP shall identify pollutants and applicable BMPs to manage runoff quality.</p> <p>I.2.a – A drainage plan shall be developed, subject to the approval of the City Engineer, as part of the Plan Check process and prior to development of any drainage improvements.</p> <p>I.2.b – No mitigation is required. However, the proposed project shall demonstrate compliance with requirements set forth by the Department of Building and Safety and the City Engineer concerning storm water drainage and flood proofing prior to development of any drainage improvements.</p>	Contractor	Pre-Construction, Construction
Land Use	<p>A.1 – No mitigation is recommended, as the Specific Plan is expected to result in a beneficial effect through implementation of programmed improvements. On an ongoing basis, the City will review building plans for consistency with the Specific Plan.</p> <p>A.2 – See Mitigation Measures B.1 through M.4.5, as identified in the other section of this EIR. No additional mitigation is recommended, as the ADP is expected to result in a beneficial effect through implementation of programmed improvements. On an ongoing basis, the City will review building plans for consistency with the ADP.</p>	Project Applicant	Pre-Construction
Noise	<p>G.1.a – Haul truck routes and staging areas shall avoid residential streets, and to the extent feasible, streets adjacent to local schools.</p> <p>G.1.b – Compliance with all provisions of the City of Los Angeles Noise Ordinance (Ordinance No. 144,331, adopted January 1973 as amended), Chapter XI of the Los Angeles Municipal Code, Noise Regulations, Articles 1-4 shall be required.</p> <p>G.1.c – Construction contracts shall require project contractors to use power construction equipment with noise shielding and muffling devices to the maximum extent feasible.</p>	Contractor	Construction

Environmental Factor	Mitigation Measures	Responsible Party	Timing
	<p>G.1.d – Noise barriers such as temporary wooden barrier walls, mufflers surrounding the construction site, and noise entrenching devices shall be employed to the fullest extent possible to reduce the intrusive construction noise.</p>		
Public Services	<p>L.1.1.a – All properties of every commercial or industrial building must be within 300 feet of an approved fire hydrant. The maximum distance between fire hydrants on roads and fire lanes is 300 feet.</p> <p>L.1.1.b – An approved fire lane shall be provided by the applicant if any portion of a first-story exterior wall of any building or structure is more than 150 feet from the edge of the roadway of an improved street.</p> <p>L.1.1.c – Fire lane width shall not be less than 20 feet and, where a fire lane must accommodate the operation of a Fire Department aerial ladder apparatus, or where fire hydrants are installed, those portions shall not be less than 28 feet width.</p> <p>L.1.1.d – At least two different ingress/egress roads shall be required in each major development area to accommodate major fire apparatus and provide for an evacuation during emergency situations.</p> <p>L.1.1.e – Fire Department access will remain clear and unobstructed during periods of demolition.</p> <p>L.1.1.f – The proposed project shall conform to the standard street dimensions shown on Department of Public Works Standards Plan D-22549.</p> <p>L.1.1.g – Fire lanes, where required, and dead end streets shall terminate in a cul-de-sac or other approved turning area.</p> <p>L.1.1.h – When required access is provided by an improvement street, fire lane, or combination of both which results in a dead-end excess of 700 feet in length from the nearest cross street, at least one additional ingress-egress roadway shall be provided in such a manner that an alternative means of ingress-egress is accomplished.</p> <p>L.1.1.i – All access roads, including fire lanes, shall be maintained in an unobstructed manner, removal of obstruction shall be at the owner’s expense. The entrance to all required fire lanes or required private driveways shall be posted with a sign no less than three square feet in area in accordance with Section 57.09.05 of the Los Angeles Municipal Code.</p> <p>L.1.1.j – Where fire apparatus will be driven onto the road level surface of the subterranean parking structure, that structure shall be engineered to withstand a bearing pressure of 8,600 pounds per square foot.</p> <p>L.1.1.k – The design, location, operation, and maintenance of any security gates shall be to the satisfaction of the Fire Department.</p> <p>L.2.1 – Whenever possible, the project design will include these specific plan design features:</p>	Project Applicant	Pre-Construction

<i>Environmental Factor</i>	<i>Mitigation Measures</i>	<i>Responsible Party</i>	<i>Timing</i>
	<p>L.2.1.a – All public parking facilities will be well-illuminated when open and a closed-circuit television system or private security patrol or other surveillance techniques will be used to monitor the areas.</p> <p>L.2.1.b – All pedestrian walkways and courtyards will be well-illuminated and landscaping will be controlled to ensure clear visibility of movement and activity.</p> <p>L.2.1.c – All building entrances, elevators, and lobby areas, as well as entrances to transit points, will be well-illuminated and designed with minimum dead space to eliminated areas of potential concealment.</p> <p>L.2.1.d – Public restrooms should be located such that security or lobby personnel can have visual access to the doorways. Public restrooms should not be located in isolated areas.</p> <p>L.2.1.e – Office-level restrooms should be installed with limited access doorways which required a key or electronic code for access by authorized employees.</p> <p>L.2.1.f – To the extent feasible, building design should consider pre-writing opportunity for advanced state-of-the-art security measures. Such considerations might include future installation of “help” or “911” buttons in strategic locations around the project (i.e., near bank teller machines, in entry areas where individuals may be momentarily stalled waiting for elevators or punching in entry codes.)</p> <p>L.2.1.g – Parking structures should be designed with people and auto security in mind. To the extent feasible, parking areas should be built as a “closed” system with fencing or screening covering window areas, and doors leading to parking areas limited to access via a keycard or electronic code system as a means to prevent unauthorized individuals from gaining access to autos.</p> <p>L.2.1.h – Upon completion of the project, the applicant shall provide the Central Area Commanding Officer with a diagram of the project. The diagram shall include access routes, unit and building numbers, and any information that might facilitate timely police response.</p> <p>L.2.1.i – Prior to plan finalization, the applicant shall coordinate with and provide to the Police Department’s Crime Prevention Unit, project plans for review regarding crime prevention features that may be appropriate to the design of the project.</p> <p>L.2.1.j – Where other agencies located on the site provide additional security officers, security officers from the following agencies shall be located on the ADP sites: MTA Police Department; U.S. Postal Police; Sheriff’s Department; and AMTRAK security. The presence of these officers, in combination with the proposed MTA police sub-station and equipment, shall offset the need for additional police officers to be provided by the project.</p> <p>L.3.1 – The applicant shall pay school fees for commercial uses, as may be required by State law, at the time of issuance of a building permit. The current school fee is \$0.28 per square foot for non-residential space. If built today and applied to the net gross floor area, development of Phase 1 would</p>		

Environmental Factor	Mitigation Measures	Responsible Party	Timing
	<p>be required to pay a fee of \$862,568 to the LAUSD.</p> <p>L.4.1 – The project design shall incorporate the following key principles of the ADP:</p> <ul style="list-style-type: none"> ▪ Continue the style and intent of the historic courtyard spaces. ▪ Connect open spaces into one continuous system ▪ Provided open spaces with diverse size, style, and character. 		
Parks and Recreation	<p>L.4.1 – The project design shall incorporate the following key principles of the ADP:</p> <ul style="list-style-type: none"> ▪ Continue the style and intent of the historic courtyard spaces. ▪ Connect open spaces into one continuous system ▪ Provided open spaces with diverse size, style, and character. 	Project Applicant	Pre-Construction
Water, Solid Waste and Disposal, Public Services	<p>M.1.1.a – Automatic sprinkler system shall be set to irrigate landscaping during early morning hours or during the evening to reduce water losses from evaporation. Landscaping shall be watered less often during cooler months and the rainfall season.</p> <p>M.1.1.b – Wherever possible, the use of reclaimed water shall be investigated as a source to irrigate large landscaped areas such as pedestrian plazas, landscaped walkways, and other open spaces.</p> <p>M.1.1.c – Selection of drought-tolerant, low water consuming plant varieties shall be used to reduce irrigation water consumption in new landscaped areas such as pedestrian plazas, walkways, and other open spaces.</p> <p>M.1.1.d – Recirculating hot water system shall be used where feasible in long piping systems (where water must be run for considerable periods before hot water is received at the outlet).</p> <p>M.1.1.e – Lower-volume water faucets and water saving showerheads shall be installed in new construction and when remodeling as well as low flush toilets in all restrooms.</p> <p>M.1.1.f – Plumbing fixtures shall be selected which reduce potential water loss from leakage due to excessive wear of washers.</p> <p>M.1.1.g – Phase I of the project shall comply with all applicable sections of the City of Los Angeles’ Water Conservation Ordinance (Ordinance No. 166,080) and Xeriscape Ordinance.</p> <p>M.2.1 – Although short-term construction impacts so solid waste and disposal services are considered</p>	Project Applicant, Contractor	Pre-Construction, Operation

<i>Environmental Factor</i>	<i>Mitigation Measures</i>	<i>Responsible Party</i>	<i>Timing</i>
	<p>less than significant, the following mitigation measure shall be implemented to further reduce adverse impacts:</p> <p>The project sponsor shall demonstrate that all construction and demolition debris, to the maximum extent feasible, will be recycled in a practical, available, and accessible manner during the construction phase. Documentation of this recycling program will be provided to the City of Los Angeles, Department of Public Works.</p> <p>M.2.2.a – In accordance with AB939, the City’s SRRE and the City’s SWMPP, the project sponsor shall prepare and submit a SRRP to the Planning Department prior to the approval of individual building permits, both documenting and outlining the incorporation of an on-site recycling/conservation program through a series of mandatory measures including, but not limited to, the following items:</p> <ul style="list-style-type: none"> ▪ Instituting a tenant/employee participation recycling program, whereby tenants/employees are given individual containers/bins to separate newsprint, white, and/or colored paper for regular custodian collection and deposit into larger separation containers to be removed by appropriate recyclers or haulers providing such services. ▪ Instituting a tenant/employee education program which would, through a series of brief educational sessions, outline various methods whereby employees can further contribute to methods of recycling/conservation in the office and home (e.g., contracting with firms for purchase of recycled papers, use of two-sided reports, replacement of Styrofoam cups with coffee mugs, etc.). <p>M.2.2.b – the project shall incorporate the use of recycled materials in building materials, furnishings, operations, and building maintenance, to the extent feasible and allowed by local codes. The SRRP shall describe the use of these materials in the project.</p> <p>M.2.2.c –A statement shall be included in the SRRP that instructs occupants about source reduction, recycling, and procurement of recycled materials. This statement shall be incorporated into the future ownership agreements, property management agreements, and tenant agreements.</p> <p>M.2.2.d – A statement shall be included in the SRRP that specifies which of the following entities will provide collection of trash and source separated materials – the City of Los Angeles; project sponsor or property management service; independent recycling contractor; or private solid waste collector who provides recycling services.</p>		

<i>Environmental Factor</i>	<i>Mitigation Measures</i>	<i>Responsible Party</i>	<i>Timing</i>
	<p>M.2.2.e –The project owner, within its property management agreements, shall conduct an annual waste audit review and measure the effectiveness of the tenant education program and recycling collection activities. To the greatest extent possible, the audit shall include:</p> <ul style="list-style-type: none"> ▪ Review of purchasing patterns to eliminate materials not compatible with the established waste diversion program. ▪ Review of operating procedures which generate either large amounts of waste or non-recyclable materials. ▪ Review of company uses and activities. ▪ Evaluation and expansion of recyclable materials to be included in a recycling program. ▪ Review of employee awareness of recycling program goals, procedures, and accomplishments. Evaluation and implementation of training for all project occupants. <p>The results of the study shall be used to improve the Source Reduction and Recycling Plan (SRRP) to reduce solid waste generation. The SRRP shall describe the methods by which designated recyclable materials will be separated from the waste stream, collected, and stored, to facilitate transportation to a recycler or hauler providing such services.</p> <p>M.2.2.f – The design of recycling systems shall facilitate source separation and collection of additional materials that may be designated as recyclable by the City in the future.</p> <p>M.2.2.g – To the extent feasible, one or more of the following yard waste management techniques shall be incorporated into the maintenance of the project:</p> <ul style="list-style-type: none"> ▪ Planting drought tolerant plants so as to minimize yard waste. ▪ Mulching and grass-recycling. ▪ Local composting through regular landscape maintenance where appropriate. <p>M.2.3.a – The property owner will provide information to project occupants and operators regarding alternatives to commonly used hazardous materials in the business and governmental environment, as well as information regarding the proper storage, handling and disposal of hazardous waste.</p> <p>M.2.3.b – The project will comply with all applicable regulations and/or measures outlined in the City of Los Angeles Household Hazardous Waste Element (HHWE).</p> <p>M.3.1.a – The project shall implement all water-conserving mitigation measures as outlined for Phase</p>		

<i>Environmental Factor</i>	<i>Mitigation Measures</i>	<i>Responsible Party</i>	<i>Timing</i>
	<p>I in Section IV.M.1, Water.</p> <p>M.3.1.b –Phase I of the project shall comply with the City of Los Angeles’ Sewer Allocation Ordinance No. 166,060).</p> <p>M.3.1.c – The sewer system shall be designed to limit flows tributary to the 16-inch line under Alameda Street to one-half of that line’s capacity. Alternative existing sewer lines shall be utilized to meet project capacity.</p> <p>M.3.2.a – The project shall implement all water-conserving mitigation measures</p> <p>M.3.2.b – Prior to Buildout Phase development, a flow test of downstream sewer lines shall be conducted to determine if existing sewer lines serving the project site still have adequate capacity to serve the Buildout Phase of the project. If any improvements to the local sewage collection lines are required, the applicant and the City shall determine the applicant’s reasonable pro-rata share of the cost for sewer system improvements.</p> <p>M.3.2.c – Buildout Phase of the project shall comply with the City of Los Angeles’ Sewer Allocation Ordinance (No. 166,060).</p> <p>M.3.2.d –Buildout Phase of the project shall comply with the City of Los Angeles’ Sewer Allocation Ordinance (No. 166,060).</p> <p>M.4.2.a – Phase I development shall comply with the State Energy Conservation Standards for New Residential and Non-Residential Buildings (Title 24, Par 6, Article 2, California Administrative Code) which establish mandatory maximum energy consumption levels for new buildings and include energy-conserving design features that must be incorporated into new development.</p> <p>M.4.2.b – During the design process, each site developer shall consult with the DWP, Energy Services Subsection, regarding any specific energy demand requirements and possible system improvements (which may be required as a result of project implementation), and for project-specific Energy Conservation Measures.</p> <p>I.2.a – A drainage plan shall be developed, subject to the approval of the City Engineer, as part of the Plan Check process and prior to development of any drainage improvements.</p> <p>I.2.b – No mitigation is required. However, the proposed project shall demonstrate compliance with</p>		

<i>Environmental Factor</i>	<i>Mitigation Measures</i>	<i>Responsible Party</i>	<i>Timing</i>
	requirements set forth by the Department of Building and Safety and the City Engineer concerning storm water drainage and flood proofing prior to development of any drainage improvements.		