

# City of Los Angeles

Department of City Planning • Environmental Analysis Section  
City Hall • 200 N. Spring Street, Room 750 • Los Angeles, CA 90012



## Initial Study

This document comprises the Initial Study as required under the California Environmental Quality Act

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### 2110 Bay Street Mixed-Use Project

Case Number: ENV-2016-3480-EIR

**Location:** 2100, 2130 Bay Street and 2141 Sacramento Street, Los Angeles, California 90021

**Council District:** 14, Jose Huizar

**Project Description:** The Project Site is located east of Santa Fe Avenue, between Bay Street to the north and Sacramento Street to the south. The Project Site is approximately 77,432 square feet (or 1.78 acres). The Site is subject to Zoning Information (ZI) ZI-2129 East Los Angeles State Enterprise Zone, ZI-2358 River Improvement Overlay District, ZI-2452 Transit Priority Area in the City of Los Angeles, ZI-2427 Freeway Adjacent Advisory Notice for Sensitive Uses, and Zi-2317 Central Industrial Redevelopment Project.

The Project Site is currently developed with an existing surface parking lot, an open-air industrial shed to be incorporated into the new development, and an approximately 4,000 square feet manufacturing building to be demolished. The Project proposes a new residential and commercial development including 110 live/work apartment units (67 studio units, 34 1-bedroom units, and 9 2-bedroom units), 113,350 square feet of creative office space, and 50,848 square feet of new commercial space that may include commercial retail, and/or restaurant floor area. The Project would include several buildings with connections via pedestrian walkways, ground floor plazas and elevated terraces. Parking would be provided on-site on multiple subterranean floors, with access/egress via a driveway intersecting the north side of Sacramento Street, east of Santa Fe Avenue, and egress only via a driveway intersecting the south side of Bay Street, east of Santa Fe Avenue. A loading driveway and trash/utility access would be provided adjacent to the egress-only driveway on Bay Street. Another loading driveway would be located on Sacramento Street, just east of Santa Fe Avenue. The Project would provide 479 vehicle parking spaces.

### Requested Permits/approvals:

1. **Pursuant to Los Angeles Municipal Code (LAMC) Section 11.5.6**, as authorized by the Los Angeles Charter Section 555, the Applicant requests approval of General Plan Amendments to permit the construction of a new mixed use project containing a maximum of 110 Live/Work Units (“LW”), 11% of the base density or 11 units will be set aside as Restricted Affordable units at a Very Low Income level, approximately 50,848 square feet of commercial space and 113,350 square feet of creative office space. The Amendments include:
  - a. To revise the land use designation in the Central City North Community Plan from Heavy Industrial to Commercial Industrial.
  - b. The deletion of Community Plan Footnote’s 1 (Height District No. 1) and 6 (For properties designated on zoning maps as Height District Nos. 1, 1L, 1VL, or 1XL (or their equivalent), development exceeding a floor area ratio of 1:5:1 up to 3:1 may be permitted through a zone change height district change

**March 2017**

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procedure, including an environmental clearance) from the Industrial land use category to accommodate a “2” Height District in the CM zone.

2. Pursuant to **LAMC Section 12.32 F and Q**, the Applicant requests approval of a Vesting Zone and Height District change from M3-1-RIO (Heavy Industrial Zone) to CM-2-RIO (Commercial Manufacturing Zone in Height District 2) to permit the construction of a new mixed use project containing a maximum of 110 LW, 11% of the base density or 11 units will be set aside as Restricted Affordable units at a Very Low Income level, approximately 50,848 square feet of commercial (retail) space and 113,350 square feet of creative office space.
3. Pursuant to **LAMC Section 16.05**, the Applicant requests the approval of Site Plan Review findings.
4. Pursuant to **California Government Code Sections 66473.1 and 66474 (Subdivision Map Act) and LAMC, Section 17.00 of Article 7 (Division of Land)**, the Applicant requests approval of a Vesting Tentative Tract Map to merge all lots into one development site.
  - a. Pursuant to LAMC Section 17.03 A, the request also includes an adjustment of less than 20% in the CM lot area requirements (1 per 800 square feet of lot area) to permit a density equal to one unit per 712 square feet of lot area (11%).
5. Pursuant to various sections of the LAMC, the Applicant will request approvals and permits from the Building and Safety Department (and other municipal agencies) for project construction actions including, but not limited to the following: demolition, excavation, shoring, grading, foundation, building, and tenant improvements.
6. Pursuant to California Environmental Quality Act, certification of the Project’s Environmental Impact Report.

**Applicant:**

Bay Capital Fund, LLC  
888 South Figueroa Street, Suite 1900,  
Los Angeles, California 90017

**Prepared By:**

CAJA Environmental Services  
11990 San Vicente Boulevard  
Los Angeles, CA 90049

**Prepared For:**

The City of Los Angeles  
Department of City Planning  
Environmental Analysis Section  
200 North Spring Street, Room 750  
Los Angeles, CA 90012-2601

**March 2017**

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## TABLE OF CONTENTS

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<u>Section</u>	<u>Page</u>
1. Project Description .....	1
2. Initial Study Checklist .....	17
• Aesthetics .....	17
• Agricultural and Forestry Resources .....	26
• Air Quality .....	28
• Biological Resources .....	31
• Cultural Resources .....	35
• Geology and Soils .....	37
• Greenhouse Gas Emissions .....	41
• Hazards and Hazardous Materials .....	43
• Hydrology and Water Quality .....	46
• Land Use and Planning .....	50
• Mineral Resources .....	51
• Noise .....	53
• Population and Housing .....	55
• Public Services .....	57
• Recreation .....	60
• Transportation/Circulation .....	61
• Tribal Cultural Resources .....	64
• Utilities and Service Systems .....	65
• Mandatory Findings of Significance .....	68

<u>Figures</u>	<u>Page</u>
1 Regional Map .....	10
2 Aerial Map .....	11
3 Site Plan .....	12

<u>Tables</u>	<u>Page</u>
1 Project Site .....	2
2 Open Space .....	5
3 Vehicle Parking .....	5
4 Bicycle Parking Required .....	6
5 Construction Schedule .....	7

**Appendices**

- A      Bay Street Entitlement Package, Perkowitz + Ruth Architects, September 14, 2016.
- B-1    Shadow Coverage, Perkowitz + Ruth Architects, June 2016.
- B-2    ZI-2452, Transit Priority Areas.
- C      Protected Tree Report, The Tree Resource, August 17, 2016.

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# 1. PROJECT DESCRIPTION

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The section is based in part on the following item, included as Appendix A of this IS:

A Bay Street Entitlement Package, Perkowitz + Ruth Architects, September 14, 2016.

The subject of this Initial Study (IS) is the proposed 2100 Bay Street Mixed-Use Project (the Project). The City's Department of City Planning is the Lead Agency under the California Environmental Quality Act (CEQA). The Initial Study is a preliminary analysis prepared by the Lead Agency to identify potentially significant environmental effects and focus the environmental subject areas to be analyzed in an Environmental Impact Report (EIR).

## **Project Information**

**Case No.:** ENV-2016-3480-EIR

**Project Name:** 2110 Bay Street Mixed-Use Project

**Project Applicant:** Bay Capital Fund, LLC  
888 South Figueroa Street, Suite 1900, Los Angeles, California 90017

**Lead Agency:** City Of Los Angeles, Department Of City Planning  
200 North Spring Street, Room 750, Los Angeles, California 90012  
Attn: Sergio Ibarra

## **Project Location**

The Project Site is located east of Santa Fe Avenue, between Bay Street to the north and Sacramento Street to the south, in the City of Los Angeles, 90021. See Figure 1, Regional Map, for the location within the context of the City. See Figure 2, Aerial Map, for the Project Site and surrounding areas.

## **Regional Setting**

The Site is in southeast Downtown Los Angeles and approximately 550 feet west of the Los Angeles River and 15 miles east of the Pacific Ocean. The Site is located within the Central City North Community Plan (CCNCP). The CCNCP contains 2005 acres which is approximately less than one percent of the land in the City of Los Angeles. The plan area is adjacent to downtown Los Angeles and bounded by the Los Angeles River to the east, the City of Vernon to the south, Alameda Street, Cesar Chavez Avenue, Sunset Boulevard, and Marview Avenue to the west, and Stadium Way, Lilac Terrace, and North Broadway to the north. The plan area is surrounded by the communities of Silverlake-Echo Park, Central City, Boyle Heights, and Northeast Los Angeles. Central City North consists of a combination of grid and curvilinear streets and includes both the industrial district east of Alameda Street from the Santa Ana Freeway south to the City of Vernon and the largely commercial and residential Chinatown district north of the Hollywood Freeway. Nearly all of the housing is low-rise multi-family at

a net density of 39 units per acre. It is located west of the Pasadena Freeway and just southeast of the Hollywood-Pasadena Freeway interchange. The low-rise commercial district that comprises Chinatown consists of a mix of low rise buildings with pedestrian oriented storefronts along segments of Hill Street and Broadway. Industrial development north of the 101 Freeway surrounds the Chinatown commercial district. The entire area south of the 101 Freeway between Alameda Street and the Los Angeles River (and railroad lines) is a major industrial district, consisting of a variety of different industrial activities.<sup>1</sup>

**Regional and Local Access and Public Transit**

Regional access is provided by the I-10 Freeway approximately 650 feet south of the Site. Local access is provided by Santa Fe Avenue and 7<sup>th</sup> Street. LA County Metro Line 60 stops at Santa Fe/Violet and Santa Fe/8<sup>th</sup> and Metro Lines 18 and 62 stops at Santa Fe/7<sup>th</sup>. Metro Blue Line Washington Station is 1.1 miles southwest of the Site. Metro Gold Line Little Tokyo Station is 1.3 miles north of the Site.

**Site Characteristics**

The Project Site’s assessor parcel number (APN), zoning, and land use designation are listed on Table 1, Project Site. The Project Site is approximately 77,432 square feet<sup>2</sup> (or 1.78 acres). The Site is subject to Zoning Information (ZI) ZI-2129 East Los Angeles State Enterprise Zone, ZI-2358 River Improvement Overlay District, ZI-2452 Transit Priority Area in the City of Los Angeles, ZI-2427 Freeway Adjacent Advisory Notice for Sensitive Uses, and Zi-2317 Central Industrial Redevelopment Project.

**Table 1  
Project Site**

Address	APN	Zone	General Plan Land Use	Size (sf)
2100, 2130 Bay Street	5166-005-005	M3-1-RIO	Heavy Manufacturing	28,744.6
None	5166-005-014			4,520.7
None	5166-005-011			2,379.6
2141 Sacramento Street				41,711.0

*Source: Zone Information & Map Access System (ZIMAS): <http://zimas.lacity.org>, January 2017.*

**Existing Uses**

The Project Site is currently developed with an existing surface parking lot, an open-air industrial shed to be incorporated into the new development, and an approximately 4,000 square feet manufacturing building to be demolished.

<sup>1</sup> Central City North Community Plan: <http://cityplanning.lacity.org/complan/central/CCNPAGE.htm>

<sup>2</sup> Perkowitz + Ruth Architects, September 14, 2016.

## Surrounding Uses

North: across Bay Street are several one-story warehouse/manufacturing buildings. The area is zoned M3-1-RIO.

South: across Sacramento Street are several one-story warehouse/manufacturing buildings. The area is zoned M3-1-RIO.

West: directly adjacent to the Site is a three-story warehouse/manufacturing building that operates several film and photography studios (1026 Santa Fe), several one-story warehouse/manufacturing buildings that operate a play/theater space (1018-1022 Santa Fe), and a six-story warehouse/industrial building that is being renovated to include music performance space, public market, restaurant and bar, event space, hotel rooms, film screening room, (1000 Santa Fe).<sup>3</sup> The area is zoned M3-1-RIO.

East: directly adjacent to the Site are several one-story warehouse/manufacturing (2161 Sacramento Street, 2136 Bay Street). The area is zoned M3-1-RIO.

## Proposed Project

The Project proposes a new residential and commercial development including 110 live/work apartment units (67 studio units, 34 1-bedroom units, and 9 2-bedroom units), 113,350 square feet of creative office space, and 50,848 square feet of new commercial space<sup>4</sup> that may include commercial retail, and/or restaurant floor are. The Project would include several buildings (a Live/Work Building with ground floor retail oriented on the southwest corner of the Site, a Retail Building with amenities oriented on the northwest corner of the Site, and a Office Building with ground floor retail oriented on the east side of the Site) with connections via pedestrian walkways, ground floor plazas and elevated terraces. Floor plans area available in Appendix A.

Each of the buildings are designed with ground floor commercial (retail) fronting not only on Bay and Sacramento streets, but also along the Project's internal central courtyard. The central courtyard is planned<sup>5</sup> with pedestrian connections to the surrounding streets. Within the site's northwestern corner, the Project will adaptively reuse an existing approximately 30-foot tall shed structure by creating an approximately 17-foot-tall single story structure with a roof top open space element under the reconstructed shed. This building's first floor is planned for retail uses while its roof top open space

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<sup>3</sup> *LA City ENV-2015-1311-MND: The project will feature a 1,529 sf, 71 seat music performance room in the basement; a 13,865 sf, 800 seat ground-floor public market, restaurant, bar, and backyard area; a 2,925 sf, 39 seat second-floor spa & salon; a 3,868 sf, 10 seat third-floor gym area/flexible event space; a 955 sf, 39 seat fifth-floor film screening room; a 5,942 sf, 267 seat sixth-floor club, music room, restaurant, & bar; a 3,352 sf, 197 seat rooftop pool terrace, lounge, and bar; and a 771 sf, 49 seat high roof observation deck & lounge.*

<sup>4</sup> *43,657 square feet of gross leasable area.*

<sup>5</sup> *The connection to Santa Fe relies on the (continued) cooperation of an adjacent property owner.*

element, below the shed structure, could be used for resident, employee, patron or community activities. The Project's eastern half of the site from Sacramento to Bay streets will be developed with a seven story building containing approximately 113,350 square feet of creative offices space and a small restaurant space on the top floor. This building is designed with numerous exterior terraces elements available to future tenants providing outdoor working areas or passive recreation areas all with views of downtown or the Los Angeles River. The 11-story live/work building fills the southwestern portion of the site and contains up to 110 live/work units, their amenity spaces and 2<sup>nd</sup> level publicly accessible gym (primarily accessed from a bridge extending from the adjacent Retail Shed to its north. It will also have elevator access from the Live Work Building). The average unit size is 947 square feet. The Project will provide 11% of its base density, 11 units, as very low income Restricted Affordable units. Resident amenities include a large roof top deck with pool, a club house, a shared art space and private balconies and decks.

***Floor Area and Density***

The buildable area (not the same as lot area) is 74,023 square feet. The permitted floor area ratio (FAR) for the existing Height District (HD) 1 is 1.5:1 (111,035 square feet). The total FAR permitted by proposed HD 2 is 6.0:1 (444,138 square feet). The requested FAR is 3.9:1 (287,137 square feet), made of 114,825 square feet live/work, 113,350 square feet office, 50,848 square feet commercial, and 8,114 square feet covered ancillary space.<sup>6</sup>

The permitted density (by CM zone) is 98 units. The permitted density (with a Lot Area reduction request equal to 10.5%) is 110 units. The proposed density is 110 units with 11% of its base density as low income units set aside (11 units).

***Height***

The permitted height by the existing zone is unlimited. The proposed Live/Work Building will be 139 feet (149 feet with the elevator tower), the proposed Retail Building will be 27 feet, and the proposed Office Building will be 90.5 feet (100.5 feet with the elevator tower).

***Setbacks***

Required:	front – 0 feet	front – 0 feet	side – 11 feet
Provided	front – 0 feet	front – 0 feet	side – 11 feet

***Open Space***

Table 2, Open Space, provides the amount of required open space and the amount provided.

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<sup>6</sup> Gross floor area. Leasable commercial floor area is 43,657 sf.

**Table 2**  
**Open Space**

<b>Amount Required</b>			
<b>Use</b>	<b>Amount (units)</b>	<b>Rate</b>	<b>Total</b>
Units < 3 habitable rooms	101	100 sf / unit	10,100
Units = 3 habitable rooms	9	125 sf / unit	1,125
<b>Total Required</b>			<b>11,225</b>
<b>Amount Provided</b>			
<b>Use</b>	<b>Total</b>		
<u>Common</u>			
1 <sup>st</sup> Level Paseo	23,560		
2 <sup>nd</sup> Level Amenity Deck	8,114		
11 <sup>th</sup> Level Live/Work Deck	8,623		
<u>Private</u>			
Balconies	5,500		
<b>Total Provided</b>			<b>49,911</b>
<i>In square feet.</i>			
<i>Source: Perkowitz + Ruth Architects, September 14, 2016.</i>			

### **Access**

Parking would be provided on-site on multiple subterranean floors, with ingress/egress via a driveway intersecting the north side of Sacramento Street, east of Santa Fe Avenue, and egress only via a driveway intersecting the south side of Bay Street, east of Santa Fe Avenue. A loading driveway and trash/utility access would be provided adjacent to the egress-only driveway on Bay Street. Another loading driveway would be located on Sacramento Street, just east of Santa Fe Avenue.

### **Parking**

Table 3, Vehicle Parking, provides the amount of required and provided parking.

**Table 3**  
**Vehicle Parking**

<b>Amount Required</b>			
<b>Use</b>	<b>Amount (size)</b>	<b>Rate</b>	<b>Total spaces</b>
Residential ≤ 3 habitable rooms	101 units	1 per unit	101
Residential > 3 habitable rooms	9 units	1.25 per unit	11
Retail	50,848 sf	2 spaces / 1,000 sf	101
Office	113,350 sf	2 spaces / 1,000 sf	226
<b>Total Required</b>			<b>439</b>
<b>Amount Provided</b>			
<b>Total Provided</b>			<b>479</b>
<b>Total EV Spaces Required (10% of all spaces)</b>			<b>48</b>
<b>Total EV Spaces Provided</b>			<b>48</b>
<i>Source: Perkowitz + Ruth Architects, September 14, 2016.</i>			

**Bicycles**

Los Angeles Municipal Code (LAMC) 12.21 A.16(a)(2) requires new projects to provide bicycle parking spaces. Commercial uses require one short term and one long term bicycle space per 2,000 square feet of floor area. Office uses require one short term bicycle space per 5,000 square feet of floor area and one long term bicycle space per 10,000 square feet of floor area. Residential uses require one bicycle parking per dwelling unit or guest room and one short-term bicycle parking per ten dwelling units or guest rooms. Short term bicycle parking shall consist of bicycle racks that support the bicycle frame at two points. Long term bicycle parking shall be secured from the general public and enclosed on all sides and protect bicycles from inclement weather. Table 4, Bicycle Parking Required, shows the required bicycle parking. The Project would provide 58 short term and 146 long term spaces for a total of 204 spaces.

**Table 4  
Bicycle Parking Required**

Use	Amount	Rate	Short-Term	Long-Term
Residential	110 units	1 per 10 units (short-term) 1 per 1 unit (long-term)	11	110
Retail	43,657 sf	1 per 2,000 sf (short-term) 1 per 2,000 sf (long-term)	25	25
Office	113,350 sf	1 per 5,000 sf (short-term) 1 per 10,000 sf (long-term)	22	11
<b>Total</b>			<b>58</b>	<b>1460</b>
<i>Source: Perkowitz + Ruth Architects, September 14, 2016.</i>				

**Landscaping**

The Site currently has 11 onsite trees, and one street (sidewalk) trees on Sacramento Street. The Project would remove all trees<sup>7</sup> and replace them per the City’s Tree Replacement Program. The Project would provide 34 trees on the Site, which exceeds the requirement of 28 trees (1 tree per 4 dwelling unit).

**Green/Conservation Features**

The Project will comply with the Los Angeles Green Building Code (LAGBC), which is based on the 2016 California Green Building Standards Code (CalGreen, effective January 1, 2017).<sup>8</sup>

**Construction Information**

The estimated construction schedule is shown in Table 5, Construction Schedule. Operation could begin in late 2021. Demolition will remove approximately 4,000 square feet of existing buildings. The amount

<sup>7</sup> Perkowitz + Ruth Architects, September 14, 2016.

<sup>8</sup> Los Angeles Department of Building and Safety: <http://ladbs.org/LADBSWeb/green-bldg.jsf>

of soils removed or exported would be approximately 88,244 cubic yards (cy).<sup>9</sup> The Project will contain three subterranean levels. It is anticipated that the demolition and construction debris will be transported to the Sunshine Canyon Landfill in Sylmar. The estimated haul route is approximately 30 miles and will generally include: Santa Fe to I-10 freeway to I-5 freeway to Sepulveda Blvd to San Fernando Road to Sunshine Canyon Landfill.

**Table 5  
Construction Schedule**

<b>Phase</b>	<b>Duration</b>	<b>Est. Dates</b>
Demolition	1 month	Jan 2019 to Feb 2019
Grading and Excavation	8 months	Feb 2019 to Oct 2019
Construction	24 months	Aug 2019 to Sept 2021
Architectural Coatings	2 months	Oct 2021 to Dec 2021
<i>Construction schedule, including start, end, and duration dates are estimates only. Client provided information, January 2017 Table: CAJA Environmental Services, January 2017.</i>		

**Project Objectives**

The objectives of the Project are as follows:

1. **Provide a set of mixed-uses that takes maximum advantage of a smart growth opportunity of a currently vacant and utilized site.**
  - Fully utilize the Project site consistent with the goals and policies in the Central City North Community Plan.
  - Construct a development that incorporates a high quality structure, landscaping and aesthetics, and creates a more beautiful and livable neighborhood environment.
  - Improve the visual character of the Project area by developing a vacant and underutilized site.
  - Activate the industrial area with new contemporary commercial opportunities that could serve the employees and new residents in the area.
  
2. **Provide needed housing.**
  - Provide a high density residential dwelling units to serve a range of potential renters including the provision of deed Restricted Affordable units, as well as provide the necessary infrastructure and associated amenities.
  - Provide housing that contributes towards the City’s Regional Housing Needs Assessment.

<sup>9</sup> Client provided information, January 2017.

- Develop additional housing stock at an infill location that is close to commercial and office locations.
- Provide affordable housing in a mixed-income community and near transit.

**3. Promote fiscal benefits, economic development, and job creation.**

- Create construction jobs through construction of a new mixed-use development.
- Develop residential and commercial uses that generate local tax revenues and provide new permanent jobs and housing for residents who could support local business.

**4. Create an environmentally sensitive development.**

- Incorporate sustainable and green building design and construction to promote resource conservation, including waste reduction, efficient water management techniques, and conservation of energy to achieve a LEED-Gold certified building.
- Create a sustainable balance of commercial and residential uses located within a transit priority area.
- Incorporate sustainable and green building design and construction to promote resource conservation, including waste reduction, efficient water management techniques, and conservation of electricity and energy.
- Reduce vehicle miles traveled (VMT) and pollutant emissions by developing a site that is adjacent to a significant employment node.

**Discretionary Actions**

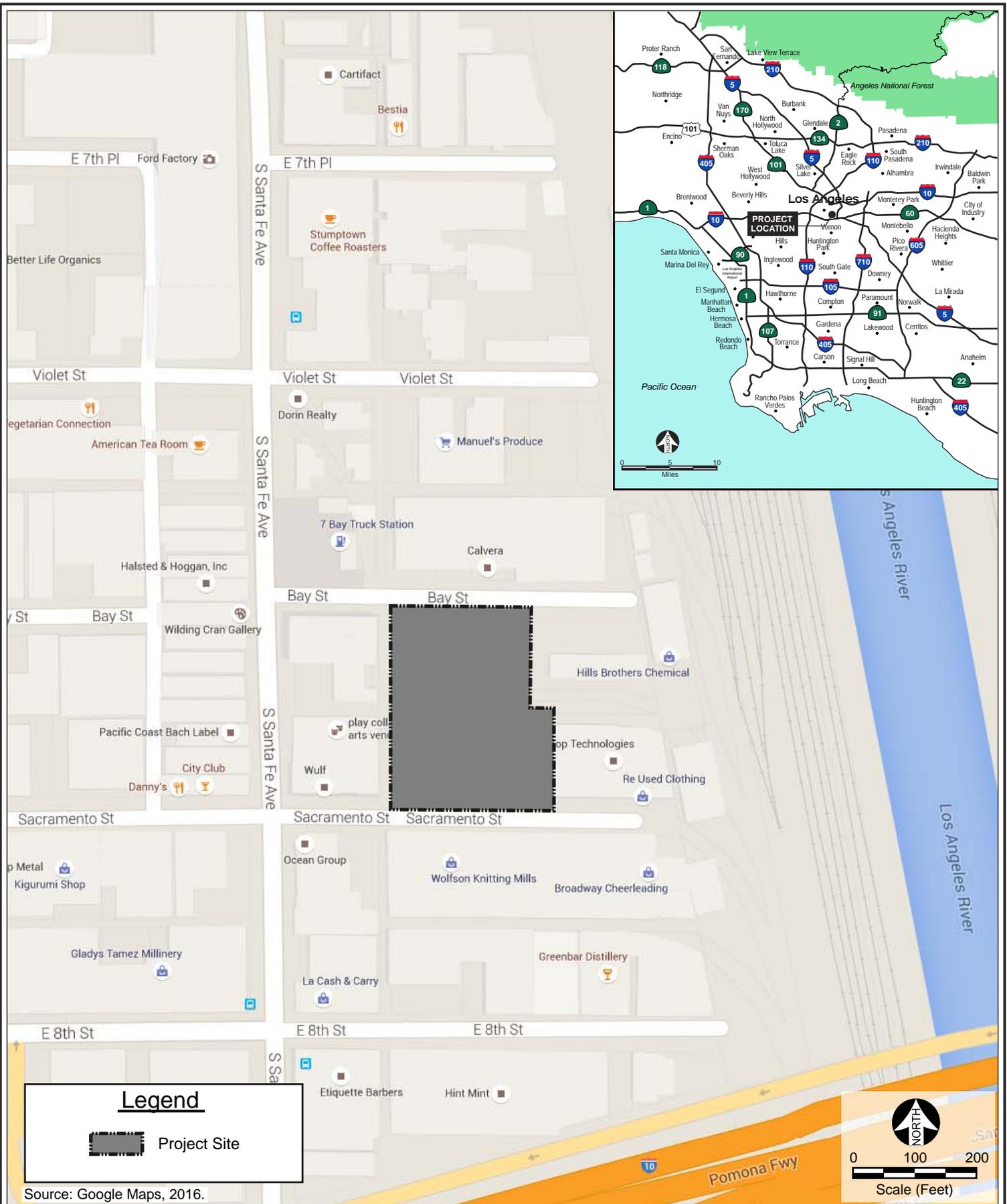
The Project will require approval of the following discretionary actions:<sup>10</sup>

1. **Pursuant to Los Angeles Municipal Code (LAMC) Section 11.5.6**, as authorized by the Los Angeles Charter Section 555, the Applicant requests approval of General Plan Amendments to permit the construction of a new mixed use project containing a maximum of 110 Live/Work Units (“LW”), 11% of the base density or 11 units will be set aside as Restricted Affordable units at a Very Low Income level, approximately 50,848 square feet of commercial space and 113,350 square feet of creative office space. The Amendments include:
  - a. To revise the land use designation in the Central City North Community Plan from Heavy Industrial to Commercial Industrial.
  - b. The deletion of Community Plan Footnote’s 1 (Height District No. 1) and 6 (For properties designated on zoning maps as Height District Nos. 1, 1L, 1VL, or 1XL (or their equivalent), development exceeding a floor area ratio of 1:5:1 up to 3:1 may be permitted through a zone

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<sup>10</sup> Project representation, November 2016.

- change height district change procedure, including an environmental clearance) from the Industrial land use category to accommodate a “2” Height District in the CM zone.
2. Pursuant to **LAMC Section 12.32 F and Q**, the Applicant requests approval of a Vesting Zone and Height District change from M3-1-RIO (Heavy Industrial Zone) to CM-2-RIO (Commercial Manufacturing Zone in Height District 2) to permit the construction of a new mixed use project containing a maximum of 110 LW, 11% of the base density or 11 units will be set aside as Restricted Affordable units at a Very Low Income level, approximately 50,848 square feet of commercial (retail) space and 113,350 square feet of creative office space.
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    - a. Pursuant to LAMC Section 17.03 A, the request also includes an adjustment of less than 20% in the CM lot area requirements (1 per 800 square feet of lot area) to permit a density equal to one unit per 712 square feet of lot area (11%);
  5. Pursuant to various sections of the LAMC, the Applicant will request approvals and permits from the Building and Safety Department (and other municipal agencies) for project construction actions including, but not limited to the following: demolition, excavation, shoring, grading, foundation, building, and tenant improvements.
  6. Pursuant to California Environmental Quality Act, certification of the Project’s Environmental Impact Report.



**Legend**

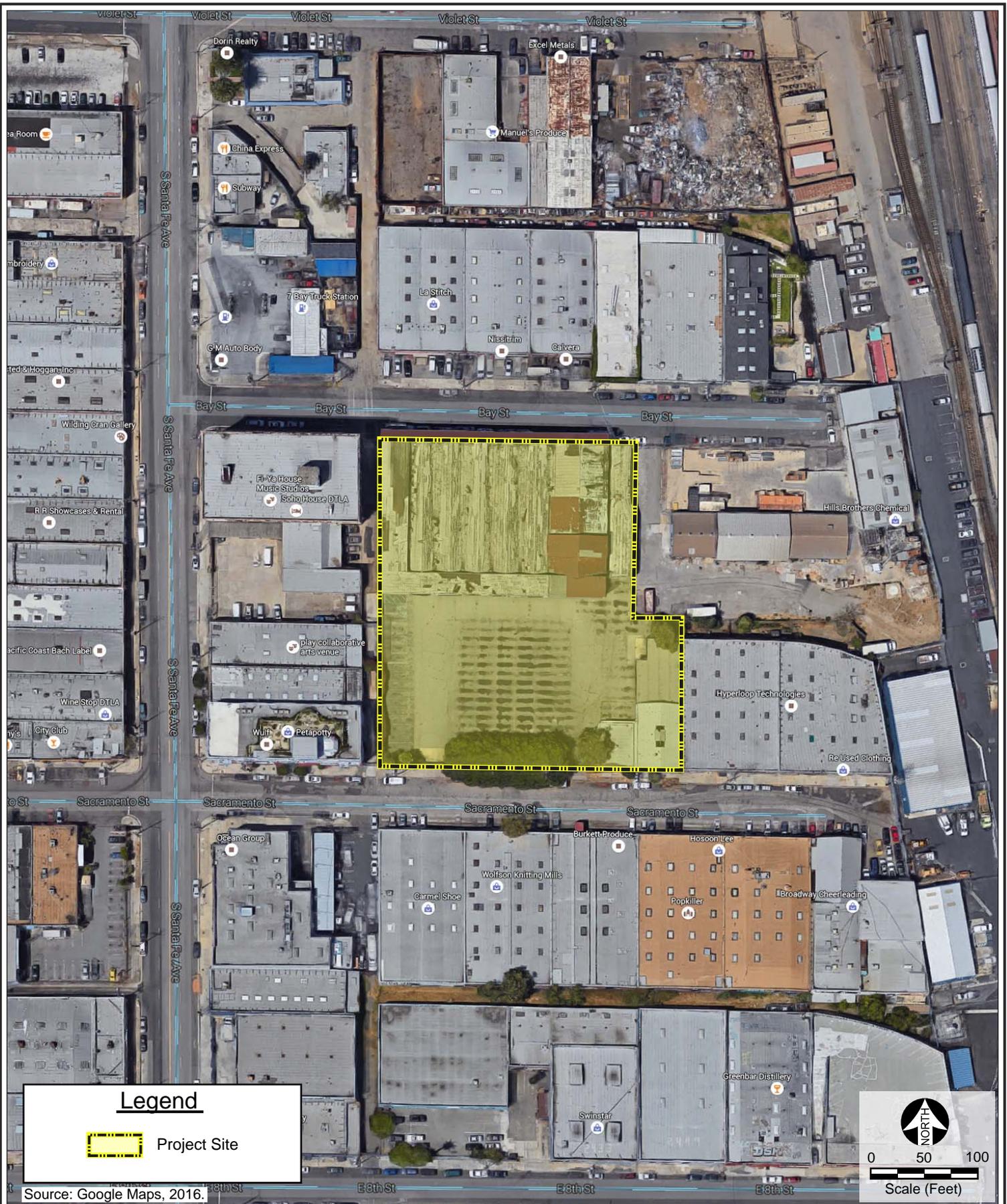
 Project Site

Source: Google Maps, 2016.

 NORTH

 0 100 200

Scale (Feet)

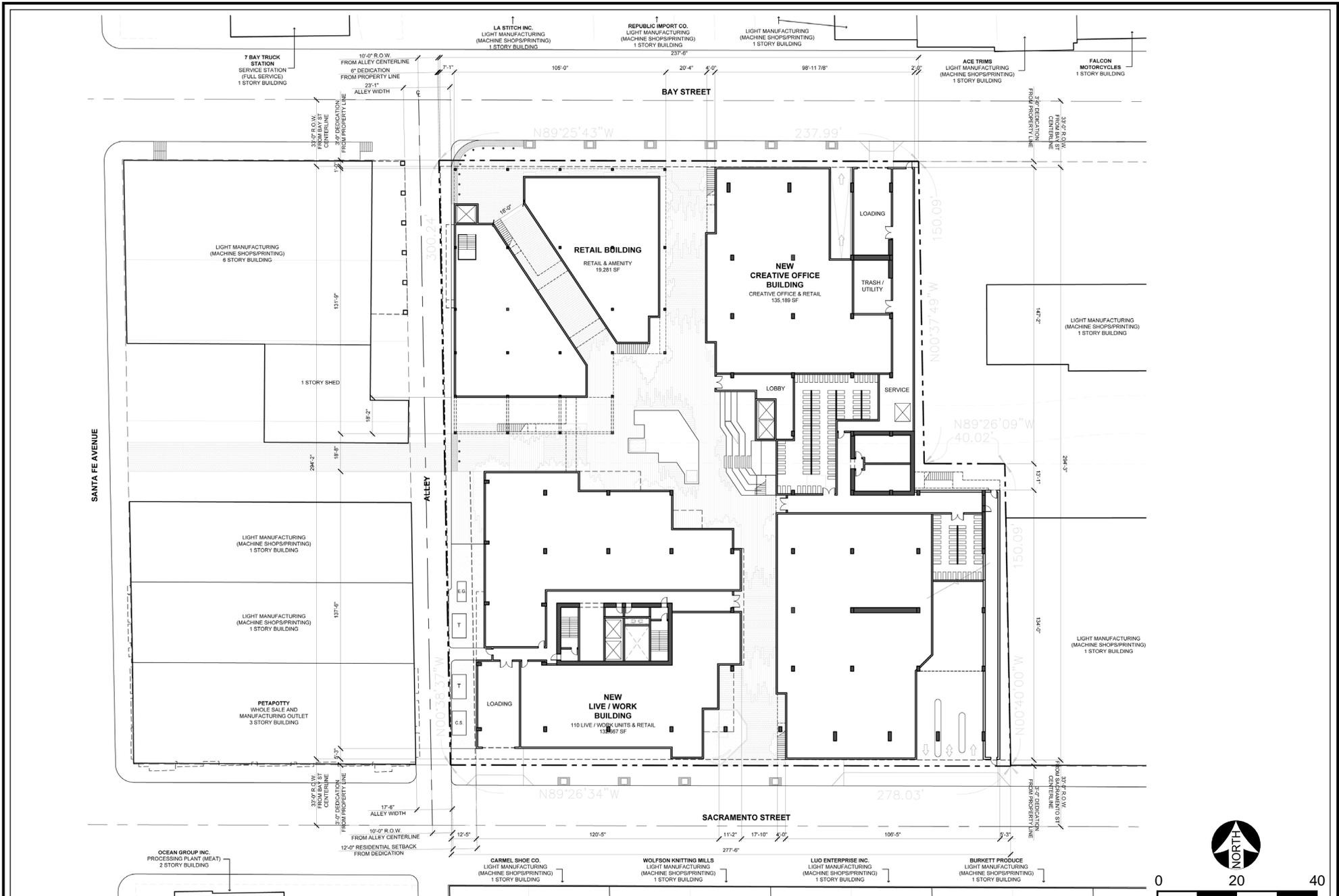


**Legend**

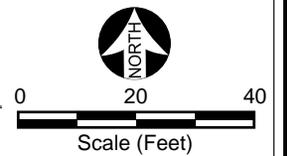
 Project Site

  
 0 50 100  
 Scale (Feet)

Source: Google Maps, 2016.



Source: Studioneleven at Perkowitz+Ruth Arch, 2016.



## 2. INITIAL STUDY CHECKLIST

<b>LEAD CITY AGENCY</b> Los Angeles City Planning Department	<b>COUNCIL DISTRICT</b> 14, Jose Huizar	<b>DATE</b> March 2017
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**RESPONSIBLE AGENCIES**

N/A

<b>PROJECT TITLE/NO.</b> 2110 Bay Street Mixed-Use Project	<b>CASE NO.</b> ENV-2016-3480-EIR
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<b>PREVIOUS ACTIONS CASE NO.</b> N/A	<input type="checkbox"/> <b>DOES</b> have significant changes from previous actions. <input type="checkbox"/> <b>DOES NOT</b> have significant changes from previous actions.
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**PROJECT DESCRIPTION:**

See Section 1 (Project Description).

**ENVIRONMENTAL SETTING:**

See Section 1 (Project Description).

**PROJECT LOCATION**

2100, 2130 Bay Street and 2141 Sacramento Street, Los Angeles, California 90021

<b>PLANNING DISTRICT</b> Central City North Community Plan Area		<b>STATUS:</b> <input type="checkbox"/> <b>PRELIMINARY</b> <input type="checkbox"/> <b>PROPOSED</b> <input checked="" type="checkbox"/> <b>ADOPTED</b>
<b>EXISTING ZONING</b> M3-1-RIO	<b>MAX. DENSITY ZONING</b> 1.5:1 FAR HD 2 allows 6:1 FAR	<input checked="" type="checkbox"/> <b>DOES CONFORM TO PLAN</b>  <input type="checkbox"/> <b>DOES NOT CONFORM TO PLAN</b>  <input type="checkbox"/> <b>NO DISTRICT PLAN</b>
<b>PLANNED LAND USE &amp; ZONE</b> CM	<b>MAX. DENSITY PLAN</b> N/A	
<b>SURROUNDING LAND USES</b> Office, commercial, warehouse	<b>PROJECT DENSITY</b> 110 units, 3.9:1 FAR	

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

**BACKGROUND**

<b>PROPONENT NAME</b> Bay Capital Fund, LLC	<b>PHONE NUMBER</b> 213-745-5191
<b>PROPONENT ADDRESS</b> 888 South Figueroa Street, Suite 1900, Los Angeles, California 90017	
<b>AGENCY REQUIRING CHECKLIST</b> City of Los Angeles Planning Department	<b>DATE SUBMITTED</b> March 2017

**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:**

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

- |  |   |  |
|--|---|--|
| <input type="checkbox"/> Aesthetics                          | <input checked="" type="checkbox"/> Greenhouse Gas Emissions      | <input checked="" type="checkbox"/> Population/Housing                 |
| <input type="checkbox"/> Agricultural and Forestry Resources | <input checked="" type="checkbox"/> Hazards & Hazardous Materials | <input checked="" type="checkbox"/> Public Services                    |
| <input checked="" type="checkbox"/> Air Quality              | <input checked="" type="checkbox"/> Hydrology/Water Quality       | <input checked="" type="checkbox"/> Recreation                         |
| <input type="checkbox"/> Biological Resources                | <input checked="" type="checkbox"/> Land Use/Planning             | <input checked="" type="checkbox"/> Transportation/Traffic             |
| <input checked="" type="checkbox"/> Cultural Resources       | <input type="checkbox"/> Mineral Resources                        | <input checked="" type="checkbox"/> Tribal Cultural Resources          |
| <input checked="" type="checkbox"/> Geology/Soils            | <input checked="" type="checkbox"/> Noise                         | <input checked="" type="checkbox"/> Utilities/Service Systems          |
|  |   | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

**DETERMINATION (To be completed by Lead Agency)**

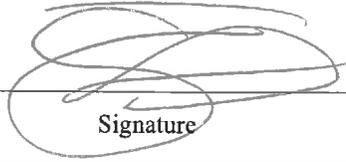
**On the basis of this initial evaluation:**

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to

applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

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Signature

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Title

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## **EVALUATION OF ENVIRONMENTAL IMPACTS:**

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

statement is substantiated

- 7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.
- 9) The explanation of each issue should identify:
  - a. The significance criteria or threshold, if any, used to evaluate each question; and
  - b. The mitigation measure identified, if any, to reduce the impact to less than significance.

**ENVIRONMENTAL IMPACTS**

(Explanations of all potentially and less than significant impacts are required to be attached on separate sheets)

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>I. Aesthetics.</b> Would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a city-designated scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The section is based in part on the following items, included as Appendix B of this IS:

**B-1** Shadow Coverage, Perkowitz + Ruth Architects, June 2016.

**B-2** ZI-2452, Transit Priority Areas.

**Response a:**

Senate Bill (SB) 743, effective January 1, 2014, deems the aesthetic impacts of residential infill projects located in defined transit priority project areas as less than significant under CEQA. Zoning Information File (ZI) No. 2452 issued by the Planning Department includes a map of the Transit Priority Areas (TPAs) located in the City. The Project Site is located within the boundaries of a TPA.<sup>11</sup> Therefore, any aesthetic impacts, including but not limited to (a) adverse effects on scenic vistas, (b) damage to scenic resources, (c) degradation of existing visual character, (d) light and/or glare, and (e) shade shadow are deemed less than significant as a matter of law. Notwithstanding the mandate imposed by SB 743, the following aesthetic analysis of the Project is provided for informational purposes only.

As described in the City of Los Angeles CEQA Thresholds Guide, panoramic views or vistas provide visual access to a large geographic area, for which the field of view can be wide and extend into the distance. Panoramic views are usually associated with vantage points looking out over a section of urban or natural area, which provide a geographical orientation not commonly available. Examples of panoramic views might include an urban skyline, valley, mountain range, the ocean, or other water bodies. The Project Site is in an urbanized portion of Los Angeles, and topographically relatively flat.

The Site is within a TPA.<sup>12</sup> The Project is a mixed-use infill development, including 110 residential units, approximately 113,350 square feet of creative office space, and 43,657 square feet of commercial shopping center space. LA County Metro Line 60 stops at Santa Fe/Violet and Santa Fe/8<sup>th</sup> and Metro Lines 18, 60, 62 stops at Santa Fe/7<sup>th</sup>. Metro Line 60<sup>13</sup> runs along Santa Fe and has a frequency of every 6-10 minutes during AM and PM commute times (whereas the requirement is 15 minutes). Metro Line 62<sup>14</sup> runs along 7th and has a frequency of every 15 minutes from around 6:45 to 7:34 AM commute times (whereas the requirement is 15 minutes). Metro Line 18<sup>15</sup> runs along 7th and has a frequency of every 8-10 minutes during AM and PM commute times (whereas the requirement is 15 minutes).

Further, the Project site is located in an urban area on a lot currently paved for surface parking. Thus, the Project's aesthetic (and parking) impacts are not considered significant impacts on the environment pursuant to Public Resources Code Section 21099. Therefore, an assessment of the Project's potential aesthetics impacts is not required. However, the analysis will be included for full disclosure.

The Project Site is located in the Central City North Community Plan (CCNCP) of the City of Los Angeles (the City). The existing visual character of the surrounding locale is typical of a dense urban area

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<sup>11</sup> City of Los Angeles. ZI 2452, "Transit Priority Areas (TPAs)/Exemptions to Aesthetics and Parking Within TPAs Pursuant to CEQA," <http://zimas.lacity.org/documents/zoneinfo/ZI2452.pdf>.

<sup>12</sup> ZIMAS: <http://zimas.lacity.org/>

<sup>13</sup> [http://media.metro.net/riding\\_metro/bus\\_overview/images/060.pdf](http://media.metro.net/riding_metro/bus_overview/images/060.pdf)

<sup>14</sup> [http://media.metro.net/riding\\_metro/bus\\_overview/images/062.pdf](http://media.metro.net/riding_metro/bus_overview/images/062.pdf)

<sup>15</sup> [http://media.metro.net/riding\\_metro/bus\\_overview/images/018.pdf](http://media.metro.net/riding_metro/bus_overview/images/018.pdf)

with multi-story buildings, single-story warehouses, and surface parking lots. Views in the vicinity of the Project site are largely constrained by structures on adjacent parcels, and the area's relatively flat topography. Viewsheds refer to the visual qualities of the geographical area that is defined by the horizon, topography, and other natural features that give an area its visual boundary and context, or by artificial developments that have become prominent visual components of an area. There are no tall or topographic features on the site from which scenic vistas may be obtained, or which make up part of the scenic landscape of the surrounding community. The Project Site is not located within or along a designated scenic corridor, and no scenic views exist from or through the developed Project Site.

In addition, CEQA is only concerned with public views with broad access by persons in general, not private views that will affect particular persons.<sup>16</sup> Urban features that may contribute to an area's valued aesthetic character or image include: structures of architectural or historic significance or visual prominence; public plazas, art or gardens; heritage oaks or other trees or plants protected by the City; consistent design elements (such as setbacks, massing, height, and signage) along a street or district; pedestrian amenities; landscaped medians or park areas; etc.<sup>17</sup>

At the street level, views in all directions are largely constrained by structures on adjacent parcels. Views east-west along Bay and Sacramento are limited by existing buildings and a dead-end along the railroad tracks at the LA River. Views north-south are also constrained by existing buildings. These views are available from the public sidewalks and would not be impeded by the Project.

The Project would comply with the goals and design principles of the CCNCP, which describes the standards that need to be met for site planning, setbacks, scale, massing, architectural design (materials, windows, glare, and lighting) and other characteristics. The Project would be designed to incorporate the architectural style of brick industrial warehouse aesthetic, thereby creating a development that does not reduce the integrity and viability of existing industrial areas. The Project Site is suitable for the type of residential/commercial development that complements the industrial character of the area. The Project would be compatible with existing and ongoing redevelopment of commercial, mixed-use, and residential uses within Downtown. No designated scenic vistas in the local area would be impeded, and the Project will not substantially block any scenic vistas. The Project would construct new buildings (live/work building up to 139 feet and office building up to 90.5 feet) on a currently largely vacant Site. Per SB 743 and ZI-2452, aesthetics impacts are less than significant.

**Response b:**

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<sup>16</sup> *Obstruction of a few private views in a project's immediate vicinity is not generally regarded as a significant environmental impact. (See Ocean View Estates Homeowners Assn., Inc. v. Montecito Water Dist., supra, 116 Cal.App.4th at p. 402 [that a project affects "only a few private views" suggests that its impact is insignificant]; Mira Mar Mobile Community v. City of Oceanside, supra, 119 Cal.App.4th at pp. 492-493 [distinguishing public and private views; "[u]nder CEQA, the question is whether a project will affect the environment of persons in general, not whether a project will affect particular persons"].*

<sup>17</sup> *L.A. CEQA Thresholds Guide, 2006, section A.1 Aesthetics.*

The Project Site does not contain trees with scenic significance or rock outcroppings and is not located within a state scenic highway. There are no identified scenic resources such as trees, rock outcroppings or historic buildings located on-site. There are no Historic Preservation Overlay Zones (HPOZs) in the area.<sup>18</sup> There are no Los Angeles Historic-Cultural Monuments (HCMs) immediately adjacent to the Site. The nearest are:<sup>19</sup>

- 3555 South Santa Fe, Inbound Freight House (LA-795), approximately 4,500 feet north of the Site
- 7<sup>th</sup> Street Bridge, between 7<sup>th</sup> and Myers Street, approximately 1,100 feet north of the Site.<sup>20</sup>

None of these HCMs is directly visible from the Site due to distances and intervening buildings. There are no major open spaces and there are no aesthetically significant man-made features (such as major architectural structures, monuments, or gardens) on the Project Site. The Project Site is not located within or along a designated scenic highway, corridor, or parkway.<sup>21</sup> The Site currently has 13 trees, including street (sidewalk) trees along Sacramento Street. These are off-site street tree as part of the City's planting program and not a native originating (natural to the location) trees. Per SB 743 and ZI-2452, aesthetics impacts are less than significant. Therefore, impacts will be less than significant.!

#### **Response c:**

The Project will create a mixed-use development near Santa Fe Avenue. This type of structure is compatible with the area which is adding residential and neighborhood serving retail and restaurants. The Project also activates an underutilized parcel, thus increasing pedestrian activity in the area. The Project will be compatible with and complementary to the surrounding area because it would consist of uses (residential and retail) that already exist in the area and would blend these uses not block-by-block but within the same parcel. The Project will further activate the area by constructing new, contemporary buildings with ground-floor retail and residential uses on the upper floors. This mixed-use project will reinvigorate a currently underutilized parcel.

The Site is surrounded by M3-1-RIO zoned properties to the north, south, east and west. The surrounding properties include a mix of industrial and commercial uses. In general, the Project area is characterized by dense downtown contextual development consisting of a mixture of some multi-family housing along with predominately commercial and various industrial uses, as well as retail uses. The neighboring commercial and industrial developments are generally low- to mid-rise in height.

The design is largely contemporary industrial, with exposed wood, steel, and brick along the re-adapted shed structure, as well as the new buildings. Various projections in the façade will break up large expanses of walls. Retail identifying signage will be mounted at the top of the ground floor level on the

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<sup>18</sup> <http://preservation.lacity.org/hpoz/la>

<sup>19</sup> *Historic Places LA*: <http://www.historicplacesla.org/map>

<sup>20</sup> <http://cityplanning.lacity.org/complan/HCM/HCM.CFM>

<sup>21</sup> *California Scenic Highway Mapping Systems*: [http://www.dot.ca.gov/hq/LandArch/scenic\\_highways/index.htm](http://www.dot.ca.gov/hq/LandArch/scenic_highways/index.htm)

primary frontages but will not interfere with the upper level components. While the uses (commercial and residential) are distinctly different from a programmatic and user/pedestrian aesthetic, the Site is unified through the use of complimentary colors and materials to create a design synergy along the entire frontage. The Project supports walkability with ground floor commercial and several pedestrian passages and plazas internal to the Site. Therefore, the Project would not degrade the existing visual character or quality of the Site and its surroundings and impacts would be less than significant.

Residents of projects located on industrial land are typically accustomed to their proximity to a mix of commercial and industrial uses. The development of this Project would provide attractive amenities for nearby residents and would thus help to achieve a better transition between commercial and residential uses than now exists. Because residents of these developments will be drawn to the restaurants, retail, and creative office uses to be offered by the Project, pedestrian activity is likely to increase, as residents would be drawn to the Project's pedestrian-friendly environment, thus creating a more adequate transition between commercial and residential uses. The Project would be developed with open-to-the-sky paseos that would include trees, planters, and landscaping to create an inviting pedestrian experience. The Project proposes an architectural character and scale that is compatible with and reflects the character of the existing neighboring warehouse buildings.

The Project seeks to create a pedestrian friendly shopping environment with its ground floor retail space oriented either to the street frontages on Sacramento and Bay or to the paseos that traverse the Project Site. The paseos are intended to create an inviting pedestrian environment by incorporating trees, seating areas and benches, and attractive landscaping in various styles of planters. The majority of retail and restaurant frontage in the Project would be provided at ground level. The Project site's proximity to downtown would likely also draw visitors and office tenants from both the large daytime population of those working in the central city and the increasing residential population to enjoy the new shopping and dining amenities to be provided by the Project. The Project would be designed with a high level of quality and distinctive character that is compatible with the existing industrial and commercial uses. The Project would be designed with brick facades that complement the existing brick warehouse buildings in the area. The design of the Project would thus be compatible with the neighboring existing uses.

The Project has been designed to enhance the existing pedestrian activity along Sacramento and Bay, with the addition of new commercial uses fronting on these streets. Moreover, the design of the Project seeks to maximize pedestrian activity by creating open-to-the-sky paseos that traverse the Project Site, inviting more pedestrian activity on the site as well as on the adjacent streets.

Policies in the Community Plan promote the concept that "any proposed development be designed to enhance and be compatible with adjacent development." The Project would be designed with an architectural style complementary to the industrial character of the neighborhood. Street frontages of the Project would have brick façades in order to complement the neighboring industrial buildings, some of which have been converted to joint live/work units. Chapter V of the Community Plan, Urban Design, has established design guidelines to define the minimum level of design that shall be observed in multiple residential, commercial, and industrial projects within the entire Plan area. With respect to site planning of commercial projects, the policies in the Community Plan design guidelines state that structures shall be

oriented toward the main commercial street where a parcel is located and shall avoid pedestrian/vehicular conflicts by:

- Maximizing retail and commercial service uses along frontages of commercial developments
- Providing front pedestrian entrances for businesses fronting on main commercial streets
- Providing through arcades from the front of buildings to rear parking for projects with wide frontages

The Project complies with these guidelines by maximizing its retail uses along Bay Street. The 1.78-acre project site allows the development to achieve a significant presence on both streets, with an approximate street frontage of 277 lineal feet on Sacramento and 237 lineal feet on Bay.

In summary, the Project proposes a high quality development that would be compatible with the industrial character of the neighborhood and would be an attractive destination for local residents and workers. The existing uses of the Project site are vacant. The existing structures and improvements on the site are aging and outmoded. The removal of most of these improvements as part of the Project (with the exception of incorporating shed structure) would improve the overall aesthetic environment at the Site. Because the Project would comply with the design guidelines of the Community Plan, it would not introduce incompatible visual elements to the Project site or visual elements that would be incompatible with the character of the area.

The River Improvement Overlay (RIO) District is designed to provide for preservation of tributaries and rivers in the City of Los Angeles by promoting river identity, supporting local species, and convenient access. Because the Project involves the redevelopment of the site, it will need to obtain administrative clearance from the Department of City Planning illustrating compliance with the RIO landscaping and design standards. As currently proposed, the landscaping proposed for the Project would comply with the design standards identified in the RIO.

There will be landscaping around the Site at the ground floor, in a central courtyard, and on the rooftop pool area. The Project would be landscaped according to LAMC Section 12.40 and 12.41. While the Project Site is under construction, construction walls and barriers would be erected, which have the potential to attract unauthorized bills and postings.

Per SB 743 and ZI-2452, aesthetics impacts are less than significant. The Project shall comply with the following provisions of the Los Angeles Municipal Code (LAMC):

***Regulatory Compliance Measures***

**RCM-Aesthetics-1      Vandalism**

The project shall comply with all applicable building code requirements, including the following:

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

**RCM-Aesthetics-2 Signage on Construction Barriers**

The project shall comply with the LAMC Section 91.6205, including but not limited to the following provisions:

- The applicant shall affix or paint a plainly visible sign, on publically accessible portions of the construction barriers, with the following language: “POST NO BILLS”.
- Such language shall appear at intervals of no less than 25 feet along the length of the publically accessible portions of the barrier.
- The applicant shall be responsible for maintaining the visibility of the required signage and for maintaining the construction barrier free and clear of any unauthorized signs within 48 hours of occurrence.

**RCM-Aesthetics-3 Aesthetics (Landscape Plan)**

All landscaped areas shall be maintained in accordance with a landscape plan, including an automatic irrigation plan, prepared by a licensed landscape architect in accordance with LAMC Sections 12.40 and 12.41. The final landscape plan shall be reviewed and approved by the City of Los Angeles Department of City Planning during the building permit process.

**Response d:**

The Project Site and surrounding area is highly urbanized and contain numerous sources of nighttime lighting, including streetlights, security lighting, illuminated signage, indoor building illumination (light emanating from the interior of structures that passes through windows), and automobile headlights. In addition, glare is a common phenomenon in the Southern California area due mainly to the occurrence of a high number of days per year with direct sunlight and the highly urbanized nature of the region, which results in a large concentration of potentially reflective surfaces. Potentially reflective surfaces introduced by the Project include new windows at the Project Site and automobiles traveling on streets in the vicinity of the Project Site.

### *Artificial Light*

An adverse impact would occur if the project created a substantial new source of artificial light that would adversely affect the surrounding area. Artificial light may be generated from individual (i.e., point) sources as well as from indirect sources of reflected light. Uses such as residences, hospitals, and hotels are considered light sensitive since they are typically occupied by persons who are subject to disturbance by bright light sources during evening hours.

The Project Site is located in a well-lit urban portion of Los Angeles where there are high levels of ambient nighttime lighting including street lighting, architectural and security lighting, and indoor building illumination (light emanating from the interior of structures which passes through windows), all of which are common to densely populated areas. The surrounding area is illuminated by freestanding streetlights and lighting from the surrounding commercial uses. Vehicle headlights from traffic on Santa Fe and surrounding side streets also contribute to overall ambient lighting levels. The Project would create additional sources of illumination. The Project Site currently contains a surface parking lot, shed and small manufacturing buildings that until recently, had active night lighting for vehicle illumination, signage, and security lights. The Project would contain an 11-story building with ground floor commercial and upper levels of residential units and a 7-story office building. Windows and the amount of interior lighting coming through windows would increase when compared to current conditions. The Project will provide exterior illumination at street level for security and pedestrian activity. All exterior lighting on the upper levels will be shielded and focused on the Site and directed away from the neighboring land uses to the maximum extent feasible and consistent with safety requirements. In addition to increasing the ambient “glow” presently associated with urban settings with this part of the City, project-related light sources could potentially spill over and illuminate off-site vantages including adjacent streets and land uses. Though the Project will increase ambient light levels in the vicinity, the increase will not be substantial because the Project Site is located in an urbanized area that is already illuminated at night, and the Project’s lighting levels would be compatible with surrounding uses. Exterior lighting will be designed to confine illumination to the Project Site and off-site areas that do not include light-sensitive uses. As discussed further below, additional project design features are included to reduce light impacts. Per SB 743 and ZI-2452, aesthetics impacts are less than significant.

### *Glare*

An adverse impact would occur if the project created a substantial new source of glare that would adversely affect day or nighttime views in the area. Glare is a common phenomenon in the southern California area due mainly to the occurrence of a high number of days per year with direct sunlight and the highly urbanized nature of the region, which results in a large concentration of potentially reflective surfaces. Potential reflective surfaces in the project vicinity include automobiles traveling and parked on streets in the vicinity of the project, exterior building windows, and surfaces of brightly painted buildings in the project vicinity. Excessive glare not only restricts visibility but increases the ambient heat reflectivity in a given area. The Project includes an increase in window and building surfaces in comparison to the existing uses. This increase in surfaces will have the potential to reflect light onto adjacent roadways and land uses. Glass that will be incorporated into the facades of the building will

either be of low-reflectivity or accompanied by a non-glare coating. As discussed further below, additional project design features are included to reduce light impacts. Per SB 743 and ZI-2452, aesthetics impacts are less than significant.

### *Shade/Shadow*

The analysis of the proposed project's potential shade/shadow impacts focuses on changes in shading conditions for those off-site uses and activities that are dependent on access to natural light. Off-site uses and activities that meet this criteria include routinely used outdoor spaces associated with residential, recreational, or institutional uses (pre-schools, schools, nursing homes); or commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas; and existing solar collectors. The Project would construct new buildings (live/work building up to 139 feet and office building up to 90.5 feet) on a currently largely vacant Site. The City of Los Angeles requires a shade/shadow evaluation for any new building over 60 feet in height.<sup>22</sup>

There are no sensitive uses within 406'-6" (3x max building height per CEQA guidelines) of the Site. There are no routinely useable outdoor spaces in the area around the Project Site (shadow arc from northwest to northeast). Winter solstice shadows would be in an arc west at 9 am north along Bay Street and the manufacturing buildings to the north. At 12 pm, the shadows would be north along Bay Street. By 3 pm, the shadows would be northeast. No sensitive use would be shaded for more than 3 hours. Summer solstice shadows would be in an arc northwest at 9 am along the adjacent manufacturing buildings to the west. From 11 am to 1 pm, the shadows would be constrained to the Site itself. At 12 pm, the shadows would be north along Bay Street. From 2 pm to 5 pm, the shadows would be east to southeast along the adjacent manufacturing buildings to the east. No sensitive use would be shaded for more than 4 hours. Since there are no sensitive receptors around the Project Site, there would be no impact to shadow-sensitive uses. Per SB 743 and ZI-2452, aesthetics impacts are less than significant.

### ***Project Design Features***

#### **PDF-Aesthetics-1      Light**

Outdoor lighting shall be designed and installed with shielding, such that the light sources cannot be seen from adjacent properties, the public right-of-way, nor from above.

#### **PDF-Aesthetics-2      Glare**

The exterior of the proposed structure shall be constructed of materials such as, but not limited to, high-performance and/or non-reflective tinted glass to minimize glare and reflected heat.

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<sup>22</sup> City of Los Angeles, *CEQA Thresholds Guide, 2006, Section A (Aesthetics and Visual Resources), Part 4.*

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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**II. Agricultural And Forestry Resources.** In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest Range and Assessment Project and Forest Legacy Assessment project and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict the existing zoning for agricultural use, or a Williamson Act Contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined by Public Resources Code section 122220(g)), timberland (as defined by Public Resources Code section 4526, or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Responses a-e:**

A significant impact may occur if a project were to result in the conversion of state-designated agricultural land from agricultural use to another non-agricultural use, the conversion of land zoned for agricultural use or under a Williamson Act contract from agricultural use to another non-agricultural use, results in the rezoning of forest land or timberland, or involves other changes in the existing environment

which, could result in conversion of Farmland to non-agricultural use. The Project Site was previously developed and is in a highly urbanized area. The Site is zoned manufacturing (M3). The Site does not contain any agricultural uses, and is not delineated as such on any maps prepared pursuant to the Farmland Mapping and Monitoring Program. No portion of the Project Site is designated as “Prime Farmland”, “Farmland of Statewide Importance,” “Unique Farmland,” or “Farmland of Local Importance.”<sup>23</sup> There are no designated agricultural land uses or Williamson Act contracts in use adjacent to or near the Project Site.<sup>24</sup> The site and the surrounding area do not contain any forest land or land zoned for timberland production. Therefore, no impact would occur. Further evaluation of this issue in an EIR is not required.

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<sup>23</sup> California Department of Conservation, *Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2014 Map*; <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2014/los14.pdf>

<sup>24</sup> California Department of Conservation, Division of Land Resource Protection, “*The Land Conservation (Williamson) Act*” (2013), <http://www.conservation.ca.gov/dlrp/lca/Pages/Index.aspx>.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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**III. Air Quality.** The significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations. Would the project result in:

a. Conflict with or obstruct implementation of the SCAQMD or Congestion Management Plan?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment (ozone, PM 2.5, & PM 10) under an applicable federal or state ambient air quality standard?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Expose sensitive receptors to substantial pollutant concentrations?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	■	<input type="checkbox"/>

**Response a:**

A significant impact may occur if a project is not consistent with the applicable Air Quality Management Plan (AQMP) or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of that plan. The Project Site is located within the 6,600 square mile South Coast Air Basin (Basin). The South Coast Air Quality Management District (SCAQMD) is required, pursuant to the Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in non-attainment (i.e., ozone [1-hour and 8-hour standards], PM<sub>10</sub>, and PM<sub>2.5</sub>). As such, the project would be subject to the SCAQMD’s AQMP. The AQMP contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG).

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment.<sup>25</sup> With regard to air quality planning, SCAG has prepared the Regional Comprehensive Plan and Guide (RCPG), which includes Growth Management and Regional Mobility

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<sup>25</sup> SCAG is the federally designated metropolitan planning organization (MPO) for Southern California region.

chapters that form the basis for the land use and transportation control portions of the AQMP, and are utilized in the preparation of the air quality forecasts and consistency analysis included in the AQMP. Both the RCPG and AQMP are based, in part, on projections originating with the City's General Plan.

A significant impact may occur if the Project is inconsistent with the growth assumptions upon which the AQMP was based. As a result, project development could have an adverse effect on the SCAQMD's implementation of the AQMP. Therefore, this issue will be analyzed further in an EIR.

**Response b:**

A project would result in a significant air quality impact if project-related emissions exceed federal, State or regional standards or thresholds, or if project-related emissions would substantially contribute to an existing or projected air quality violation. The analysis will include modeling of emissions using CalEEMod Version 2016.3.1. Construction and operation of the Project will result in an increase in uses which has the potential to generate emissions which could exceed federal, State, or regional standards or thresholds or contribute to an existing or projected air quality violation. Therefore, this issue will be analyzed further in an EIR.

**Response c:**

A significant impact would occur if the proposed project would result in a cumulatively considerable net increase in a federal or State non-attainment pollutant. With regard to determining the significance of the Project's contribution to regional emissions, the SCAQMD recommends that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project specific impacts. Therefore, according to the SCAQMD, an individual project that generates construction or operational emissions that exceed the SCAQMD recommended daily thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment. The Project has the potential to add a cumulatively considerable contribution to a federal or State non-attainment pollutant. Therefore, this issue will be analyzed further in an EIR.

**Response d:**

A significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors. Land uses that are considered more sensitive to air pollution than others include hospitals, schools, residences, playgrounds, childcare centers, athletic facilities, and retirement homes.<sup>26</sup> Sensitive receptors in the Project vicinity include a three-story warehouse/manufacturing building that operates several film and photography studios (1026 Santa Fe), several one-story warehouse/manufacturing buildings that operate a play/theater space (1018-1022 Santa Fe), and a six-story warehouse/industrial building that is being renovated to include music performance space, public market, restaurant and bar, event space, hotel rooms, film screening room, (1000 Santa

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<sup>26</sup> South Coast Air Quality Management District, *CEQA Air Quality Handbook, Figure 5-1, April 1993.*

Fe).<sup>27</sup> The Project could expose these sensitive receptors to substantial pollutant concentrations during construction and operation. Therefore, this issue will be analyzed further in an EIR.

**Response e:**

A significant impact would only occur if the project would generate substantial odors. The SCAQMD's *CEQA Air Quality Handbook* identifies those land uses that are associated with odor complaints, which typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The project does not include any of the uses identified by the SCAQMD as being associated with odors. While the project does include restaurant uses, compliance with industry standard odor control practices, SCAQMD Rule 402 (Nuisance), and SCAQMD Best Available Control Technology Guidelines would limit potential objectionable odor impacts during the project's long-term operations phase to a less-than-significant level.

Potential sources that may emit odors during construction activities include the use of architectural coatings and solvents as well as asphalt paving. SCAQMD Rules 1108 and 1113 limit the amount of volatile organic compounds from cutback asphalt and architectural coatings and solvents, respectively. Via mandatory compliance with SCAQMD Rules, no construction activities or materials are proposed which would create a significant level of objectionable odors and would limit potential objectionable odor impacts during the project's short-term construction phase to a less-than-significant level. Therefore, further evaluation of this issue is not required.

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<sup>27</sup> *LA City ENV-2015-1311-MND: The project will feature a 1,529 sf, 71 seat music performance room in the basement; a 13,865 sf, 800 seat ground-floor public market, restaurant, bar, and backyard area; a 2,925 sf, 39 seat second-floor spa & salon; a 3,868 sf, 10 seat third-floor gym area/flexible event space; a 955 sf, 39 seat fifth-floor film screening room; a 5,942 sf, 267 seat sixth-floor club, music room, restaurant, & bar; a 3,352 sf, 197 seat rooftop pool terrace, lounge, and bar; and a 771 sf, 49 seat high roof observation deck & lounge.*

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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**IV. Biological Resources.** Would the project:

a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the City or regional plans, policies, regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The section is based in part on the following item, included as Appendix C of this IS:

**C** Protected Tree Report, The Tree Resource, August 17 2016.

**Response a:**

A significant impact would occur if a project would remove or modify habitat for any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulation, or by the State or federal regulatory agencies cited above. The Site contains a vacant industrial

shed, surface parking, and vacant manufacturing buildings. There are no City or county significant ecological areas on the Project Site or near the Project Site's vicinity.<sup>28</sup> The Site does not contain any natural open spaces, act as a wildlife corridor, nor possess any areas of significant biological resource value. No hydrological features are present on the Site and there are no sensitive habitats present. Due to the lack of biotic resources, no candidate, sensitive, or special status species identified in local plans, policies, regulations, by the California Department of Fish and Game (CDFG), the California Native Plant Society (CNPS), or the U.S. Fish and Wildlife Service (USFWS) would be expected to occur on the Site. Therefore, no impact would occur. Further evaluation of this issue in an EIR is not required.

**Response b:**

A significant impact would occur if riparian habitat or any other sensitive natural community identified locally, regionally, or by the State and federal regulatory agencies cited would be adversely modified by a project. No riparian or other sensitive habitat areas are located on or adjacent to the Project Site.<sup>29</sup> The nearby LA River is classified as Wetland (Riverine) but is 550 feet from the Site and there are intervening buildings and railroad uses. Therefore, no impact will occur. Further evaluation of this issue in an EIR is not required.

**Response c:**

A significant impact would occur if federally protected wetlands, as defined by Section 404 of the Clean Water Act, would be modified or removed by a project. The nearby LA River is classified as Wetland (Riverine) but is 550 feet from the Site and there are intervening buildings and railroad uses.<sup>30</sup> This habitat area is not near the Project Site and will not be affected by Project construction or operations. Therefore, the Project will not result in the direct removal, filling, or hydrological interruption of a federally protected wetland as defined by Section 404 of the Clean Water Act. Therefore, no impact would occur. Further evaluation of this issue in an EIR is not required.

**Response d:**

A significant impact would occur if a project would interfere or remove access to a migratory wildlife corridor or impede the use of native wildlife nursery sites. The Site contains a vacant industrial shed, surface parking, and vacant manufacturing buildings and has no vegetation and would not interfere substantially with the movement of any native resident or migratory birds. The Site is located within an urban area that is highly disturbed. The Project would not involve changes in the existing environment that could interfere with the movement of migratory birds or other wildlife species. In addition, no bodies of water exist on the Site to provide habitat for fish. As such, project implementation would neither

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<sup>28</sup> *Navigate LA, Significant Ecological Areas layer: <http://navigate.lacity.org/navigate/>*

<sup>29</sup> *U. S. Fish & Wildlife Service, National Wetlands Inventory, Wetlands Mapper, website: <http://www.fws.gov/wetlands/Data/Mapper.html>, January 6, 2017.*

<sup>30</sup> *U. S. Fish & Wildlife Service, National Wetlands Inventory, Wetlands Mapper, website: <http://www.fws.gov/wetlands/Data/Mapper.html>, January 6, 2017.*

interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors nor impede the use of native wildlife nursery sites. Therefore, no impact would occur. Further evaluation of this issue in an EIR is not required.

**Response e:**

A significant adverse impact would occur if a project were inconsistent with local regulations pertaining to biological resources. The Project would be confined to a previously developed Site and would not involve substantial changes in the existing environment. Local ordinances protecting biological resources are limited to the City of Los Angeles Protected Tree Ordinance, as modified by Ordinance 177404. The amended Protected Tree Ordinance provides guidelines for the preservation of all Oak trees indigenous to California (excluding the Scrub Oak or *Quercus dumosa*) as well as the following tree species: Southern California Black Walnut (*Juglans californica* var. *californica*); Western Sycamore (*Platanus racemosa*); and California Bay (*Umbellularia californica*).<sup>31</sup>

There are 11 Non-Protected Significant Trees on Project Site and one street tree along Sacramento Street. The proposed construction includes the demolition of several structures, the reuse of an existing shed structure, and re-development of the Project Site. All trees on Site will be impacted and are recommended for removal and replacement to the satisfaction of the City of Los Angeles. Replacement will occur at a one-to-one (1:1) ratio and will be reflected in the landscape design for the Project.<sup>32</sup> This is described in the Regulatory Compliance Measure below. Impacts would be less than significant.

**Regulatory Compliance Measure**

**RCM-Biological-1      Tree Removal**

- Removal of trees in the public right-of-way requires approval by the Board of Public Works. All trees in the public right-of-way shall be provided per the current standards of the Urban Forestry Division the Department of Public Works, Bureau of Street Services.
- The required Tree Report shall include the location, size, type, and condition of all existing trees in the adjacent public right-of-way and shall be submitted for review and approval by the Urban Forestry Division of the Bureau of Street Services, Department of Public Works (213-847-3077).
- All significant (8-inch or greater trunk diameter, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground) non-protected trees on the site proposed for removal shall be replaced at a 1:1 ratio with a minimum 24-inch box tree. Net, new trees, located within the

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<sup>31</sup> City of Los Angeles, Ordinance 177404, approved March 13, 2006 and effective April 23, 2006.

<sup>32</sup> *Protected Tree Report, The Tree Resource, June 29, 2016.*

parkway of the adjacent public right(s)-of-way, may be counted toward replacement tree requirements.

**Response f:**

A significant impact would occur if a project would be inconsistent with policies in any draft or adopted conservation plan. The Project Site is located in an urbanized area of Los Angeles and is currently developed with buildings, paving, and minimal landscaping. The Site is not located in or adjacent to an existing or proposed Significant Ecological Area.<sup>33</sup> Additionally, there is no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan that applies to the Project Site. The Project is within the River Improvement Overlay District (RIO), which requires compliance with the RIO District and development regulations in LAMC Section 13.17. The Project would comply with these regulations. The Project would not conflict with any habitat conservation plans. Therefore, no impact would occur and further evaluation of this issue in an EIR is not required.

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<sup>33</sup> *NavigateLA, Significant Ecological Area layer: <http://navigatela.lacity.org/navigatela/>, January 6, 2017.*

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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**V. Cultural Resources:** Would the project:

a. Cause a substantial adverse change in significance of a historical resource as defined in State CEQA Section 15064.5?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA Section 15064.5?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Disturb any human remains, including those interred outside of dedicated cemeteries?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Response a:**

The Site contains a vacant industrial shed that was built in 1915 that will be retained and incorporated into the proposed development. The Site has never been previously surveyed for historic or architectural significance. Accordingly, the project could result in a potentially significant impact on a historical resource. Therefore, this issue will be analyzed further in an EIR.

**Response b:**

Section 15064.5 of the State CEQA Guidelines defines significant archaeological resources as resources which met the criteria for historical resources, as discussed above, or resources which constitute unique archaeological resources. A project-related significant adverse effect could occur if the Project was to affect archaeological resources which fall under either of these categories. The excavation of the subterranean parking levels has the potential to affect unknown archaeological resources. Project impacts with respect to archaeological resources are therefore potentially significant and will be analyzed further in an EIR.

**Response c:**

A project-related significant adverse effect could occur if grading or excavation activities associated with the proposed project would disturb paleontological resources or geologic features which presently exist within the Project Site. The excavation of the subterranean parking levels has the potential to affect unknown paleontological resources. Project impacts with respect to paleontological resources are therefore potentially significant and will be analyzed further in an EIR.

**Response d:**

A project-related significant adverse effect could occur if grading or excavation activities associated with the proposed project would disturb previously interred human remains. The Project Site is located in a heavily urbanized area. During the construction phase and excavation of the subterranean parking levels, there is a possibility that human remains could be encountered. Project impacts with respect to human remains are therefore potentially significant and will be analyzed further in an EIR.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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**VI. Geology and Soils.** Would the project:

- |  |   |   |   |   |
|--|---|---|---|---|
| a. Exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:   |   |   |   |   |
| i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. | ■ | □ | □ | □ |
| ii. Strong seismic ground shaking?   | ■ | □ | □ | □ |
| iii. Seismic-related ground failure, including liquefaction?   | ■ | □ | □ | □ |
| iv. Landslides?  | ■ | □ | □ | □ |
| b. Result in substantial soil erosion or the loss of topsoil?  | ■ | □ | □ | □ |
| c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?  | ■ | □ | □ | □ |
| d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?   | ■ | □ | □ | □ |
| e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?   | □ | □ | □ | ■ |

In 2015, the California Supreme Court in *CBIA v. BAAQMD*, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of the project. On the other hand, if the project exacerbates a condition in the existing environment, the lead agency is required to analyze that impact of that exacerbated condition on future residents and users of the project (as well as other impacted individuals).

**Response a.i:**

Fault rupture is defined as the surface displacement that occurs along the surface of a fault during an earthquake. Based on criteria established by the California Geological Survey (CGS), faults can be classified as active, potentially active, or inactive. Active faults may be designated as Earthquake Fault

Zones under the Alquist-Priolo Earthquake Fault Zoning Act, which includes standards regulating development adjacent to active faults. In addition, the City of Los Angeles designates Fault Rupture Study Zones on each side of active and potentially active faults to establish areas of hazard potential.

There are several principal active faults in the metropolitan region. The greatest of these is the San Andreas Fault, approximately 35 miles (55 kilometers) northwest of downtown Los Angeles, on the other side of the San Gabriel Mountains. Several other important active faults lie closer to and even within the populated area of greater Los Angeles. These include the Sierra Madre fault zone, which runs through parts of Altadena and other foothills communities, the Raymond Fault in San Marino, and the Hollywood and Santa Monica Faults along the southern edge of the Hollywood Hills and Santa Monica Mountains.

The Site is not within an Alquist-Priolo Fault Zone.<sup>34</sup> The Project would comply with the CGS *Special Publications 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California* (1997), which provides guidance for evaluation and mitigation of earthquake-related hazards, and with seismic safety requirements in the UBC and the LAMC. Nonetheless, as the Site is located in a seismically active region, potential impacts associated with fault rupture will be analyzed further in an EIR.

**Response a.ii:**

A significant impact may occur if a project represents an increased risk to public safety or destruction of property by exposing people, property or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with locations in the Southern California region. Southern California is active seismic region (UBC Seismic Zone IV). Although the Project Site is not within an Alquist-Priolo Zone, the Site is susceptible to ground shaking during a seismic event. The main seismic hazard affecting the Site is moderate to strong ground shaking. The Project would conform to all applicable provisions of the City Building Code and the UBC with respect to new construction. Adherence to current building codes and engineering practices would ensure that the Project would not expose people, property or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with locations in the Southern California region. Nonetheless, as the Site is located in a seismically active region, this potential impact from ground shaking will be analyzed further in an EIR.

**Response a.iii:**

Liquefaction is a form of earthquake-induced ground failure that occurs primarily in relatively shallow, loose, granular, water-saturated soils. Liquefaction can occur when these types of soils lose their inherent shear strength due to excess water pressure that builds up during repeated movement from seismic activity. Low groundwater table and the presence of loose to medium dense sand and silty sand are factors that could contribute to the potential for liquefaction. The Project Site is not identified by ZIMAS as being within a liquefaction zone.<sup>35</sup> The City of Los Angeles Seismic Safety Element does not identify the

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<sup>34</sup> City of Los Angeles, *ZIMAS Parcel Profile Reports*, website: <http://zimas.lacity.org>, January 6, 2017.

<sup>35</sup> City of Los Angeles, *ZIMAS Parcel Profile Report*, website: <http://zimas.lacity.org>, January 6, 2017.

Project Site as being within a liquefiable area.<sup>36</sup> The Project would be required to comply with building regulations set forth by the State Geologist, which require site analysis prior to development. Furthermore, the Project would comply with the CGS *Special Publications 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California* (1997), which provides guidance for evaluation and mitigation of earthquake-related hazards including liquefaction. Nonetheless, this potential impact will be analyzed further in an EIR.

**Response a.iv:**

A significant adverse effect may occur if a project is located in a hillside area with soil conditions that would suggest high potential for sliding. Landslides can occur on slopes under normal gravitational forces and during earthquakes when strong ground motion can cause failure. Landslides tend to occur in loosely consolidated, wet soil, and/or rock on unstable sloping terrain. The Project Site is not classified as a landslide hazard zone in the CGS Seismic Hazards Map.<sup>37</sup> The Project Site is also not identified by ZIMAS as being within a landslide hazard zone.<sup>38</sup> Nonetheless, this potential impact will be analyzed further in an EIR.

**Response b:**

A significant impact may occur if a project exposes large areas to the erosional effects of wind or water for a protracted period of time. The Project Site is located in an urbanized portion of Los Angeles and was previously developed with an existing building and surface parking. Any topsoil that may exist on the Site was previously blended with other on-site soils during previous site preparation/grading activities. As such, development of the Project would not result in substantial loss of topsoil. Construction activities such as grading and excavation could create a potential for soil erosion. The potential for soil erosion on the Project Site is low due to the generally level topography of the Project Site and the presence of off-site drainage facilities. Project construction would require the removal of existing pavement and grading earth and excavation. Conformance with City Building Code Sections 91.7000 through 91.7016, which include construction requirements for grading, excavation, and use of fill, would reduce the potential for wind or waterborne erosion. In addition, the Los Angeles Building Code requires an erosion control plan to be reviewed by the Department of Building and Safety prior to construction if grading exceeds 200 cubic yards and occurs during the rainy season (between November 1 and April 15). Therefore, project impacts related to soil erosion during construction, with the inclusion of the proposed design features, are anticipated to be minimal. The potential for soil erosion during project operation would be relatively low due to the urbanized nature of the Project site and area and the generally level topography of the Site. In addition, the Project Site will be improved with new buildings, hardscape and landscape. Nonetheless, this potential impact will be analyzed further in an EIR.

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<sup>36</sup> *City of Los Angeles, Safety Element of the General Plan, Areas Susceptible to Liquefaction, Exhibit B:* <http://planning.lacity.org/cwd/gnlpln/saftyelt.pdf>.

<sup>37</sup> *California Geologic Survey, Seismic Hazard Zones, Hollywood Quadrangle:* [http://gmw.consrv.ca.gov/shmp/download/pdf/ozn\\_holly.pdf](http://gmw.consrv.ca.gov/shmp/download/pdf/ozn_holly.pdf).

<sup>38</sup> *City of Los Angeles, ZIMAS Parcel Profile Report, website:* <http://zimas.lacity.org>.

**Response c:**

A significant impact may occur if a project is built in an unstable area without proper site preparation or design features to provide adequate foundations for project buildings, thus posing a hazard to life and property. The Site contains a vacant industrial shed, surface parking, and vacant manufacturing buildings. Subsidence is a localized mass movement that involves the gradual downward settling or sinking of the ground, resulting from the extraction of mineral resources, subsurface oil, groundwater, or other subsurface liquids, such as natural gas. Since the Project may require dewatering for construction of the subterranean parking, the potential for subsidence may occur. Therefore, this issue and soil suitability will be analyzed further in an EIR.

**Response d:**

A significant impact may occur if a project is built on expansive soils without proper site preparation or design features to provide adequate foundations for project buildings, thus posing a hazard to life and property. Expansive soils are clay-based soils that tend to expand (increase in volume) as they absorb water and shrink as water is drawn away. If soils below the development consist of expansive clays within a zone where the water content can fluctuate, foundation movement and/or damage can occur. Although the Project must comply with building regulations set forth by the California Building Code, the potential for an impact still exists. Therefore, this issue will be analyzed further in an EIR.

**Response e:**

A significant impact may occur if a project is located in an area not served by an existing sewer system. The Project Site is located in a developed area of the City of Los Angeles, which is served by a wastewater collection, conveyance and treatment system operated by the City. No septic tanks or alternative disposal systems are necessary, nor are they proposed. Therefore, no impact would occur. Further evaluation of this issue in an EIR is not required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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**VII.Greenhouse Gas Emissions.** Would the project:

- |  |   |                          |                          |                          |
|--|---|--------------------------|--------------------------|--------------------------|
| a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact upon the environment?    | ■ | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | ■ | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

**Responses a and b:**

Construction and operation of the Project has the potential to generate greenhouse gas emissions (GHGs) because it will result in new construction and uses, which may directly or indirectly have a significant impact on the environment. The international scientific community has recognized that GHGs are contributing to global climate change. The Project would result in short-term emissions of GHGs during construction. These emissions would generally be associated with the operation of construction equipment and the disposal of construction waste and demolition debris. GHG emissions would also result from operation of the Project, such as automobiles and commercial service trucks traveling to and from the site, as well as consumption of electricity, natural gas, water, landscape equipment, and generation of solid waste and wastewater.

California has passed several bills and the Governor has signed at least three executive orders regarding greenhouse gases. GHG statues and executive orders (EO) include Assembly Bill (AB) 32, Senate Bill (SB) 1368, EO S-03-05, EO S-20-06 and EO S-01-07. AB 32, the California Global Warming Solutions Act of 2006, is one of the most significant pieces of environmental legislation that California has adopted. Most notably AB 32 mandates California’s GHG emissions be reduced to 1990 levels by 2020. The SCAQMD has published a “Draft Guidance Document – Interim CEQA GHG Significance Threshold”. This document establishes a five-tiered process for evaluating the GHG impacts of a project. Tier 1 involves determining if the project qualifies for a CEQA exemption. If the project is not exempt, Tier 2 involves determining whether the project is consistent with an adopted GHG reduction plan that might be part of a local general plan. Under the SCAQMD’s “Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold” if a City has not adopted a Climate Action Plan a Tier 3 GHG analysis is conducted. In September 2010, the SCAQMD’s GHG CEQA Significance Threshold Working Group released the following recommended Tier 3 threshold and analysis recommendations, which are commonly used for CEQA analysis of greenhouse gas emissions in the SCAQMD when a project is not covered by a Tier 2 GHG reduction plan:

Project-related construction emissions should be amortized over 30 years and should be added back to the Project’s operational emissions.

3,000 MTCO<sub>2</sub>e per year for all land use types; or

3,500 MTCO<sub>2</sub>e per year for residential

1,400 MTCO<sub>2</sub>e per year for commercial, or

3,000 MTCO<sub>2</sub>e per year for mixed-use projects.

In addition, Senate Bill 375 (SB 375) passed by the State of California in 2009, requires metropolitan regions to adopt transportation plans and a sustainable communities strategy that reduce vehicle miles travelled. In accordance with SB 375, SCAG prepared and adopted the 2016 RTP/SCS with the primary goal of enhancing sustainability by increasing multi-modal transportation options, and identifying land use strategies that focus new housing and job growth in areas served by public transit. Additionally, the 2016 RTP/SCS reaffirms the 2008 Advisory Land Use Policies that were incorporated into the 2012 RTP/SCS. In addition, the Project will need to be fully evaluated for consistency with all applicable plans, policies, and regulations for the purpose of reducing the emissions of greenhouse gases. Therefore, the Project's generation of greenhouse gas emissions and consistency with applicable plans and policies will be analyzed in the EIR.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>VIII. Hazards and Hazardous Materials.</b> Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	■
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for the people residing or working in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	■
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	■

In 2015, the California Supreme Court in *CBIA v. BAAQMD*, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of the project. On the other hand, if the project exacerbates a condition in the existing environment, the lead agency is required to analyze that impact of that exacerbated condition on future residents and users of the project (as well as other impacted individuals).

**Response a:**

A significant impact may occur if a project involves use or disposal of hazardous materials as part of its routine operations and would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors. The construction activities are anticipated to use typical, although potentially hazardous, construction materials, including vehicle fuels, paints, mastics, solvents, and other acidic and alkaline solutions that would require special handling, transport, and disposal. During operation, residential and office uses would store and use maintenance products, such as cleaning materials. Since the Project would require the transport, use, and disposal of hazardous materials, the potential for an impact exists. Therefore, this issue will be analyzed further in an EIR.

**Response b:**

A significant impact may occur if a project could potentially pose a hazard to nearby sensitive receptors by releasing hazardous materials into the environment through accident or upset conditions. While the Project Site is currently vacant, it was previously developed. There is the potential that the previous uses, or other nearby uses could have historical contamination at the Site. Therefore, this issue will be analyzed further in an EIR.

**Response c:**

A significant adverse effect may occur if a Project Site is located within one-quarter mile of an existing or proposed school site and is projected to release toxic emissions which pose a health hazard beyond regulatory thresholds. The Project would use, at most, minimal amounts of hazardous materials for routine cleaning and maintenance, and would be used, stored, and disposed of in accordance with manufactures' instructions and in compliance with applicable federal, state, and local regulations. The Project Site is in close proximity to the following school:<sup>39</sup>

- Metropolitan High School, located at 727 Wilson Street, approximately 1,550 feet to the northwest.

Therefore, this issue will be analyzed further in an EIR.

**Response d:**

California Government Code Section 65962.5 requires various State agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis. A significant impact may occur if a project site is included on any of the above lists and poses an environmental hazard to surrounding sensitive uses. Typically, the types of land uses on the Project Site (residential and commercial) are not anticipated to represent a hazard to the public or environment. There

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<sup>39</sup> *Navigate LA, LAUSD Schools Layer: <http://navigatela.lacity.org/>*

are no identified hazards on the Project Site.<sup>40</sup> However, the potential exists for the Project Site and/or any number of hazardous materials sites near the Project Site, including sites up-gradient, to be listed according to Government Code Section 65962.5 which could create a significant hazard to the public. Therefore, this issue will be analyzed further in an EIR.

**Responses e and f:**

A significant impact may occur if a project is located within two miles of a public airport, and subject to a safety hazard or within the vicinity of a private airstrip. The Project Site is not located in the vicinity of a public airport or private airstrip. LAX is located approximately 12 miles to the southwest. Whiteman Airport is located approximately 18 miles to the north. Therefore, no impact would occur. Further evaluation of this issue in an EIR is not required.

**Response g:**

A significant impact may occur if a project were to interfere with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan or would generate traffic congestion that would interfere with the execution of such a plan. The construction and operation activities have the potential to impede public access or travel upon public rights-of-way as well as interfere with any adopted emergency response or evacuation plan. Therefore, this issue will be analyzed further in an EIR.

**Response h:**

A significant impact may occur if a project is located in proximity to wildland areas and poses a potential fire hazard, which could affect persons or structures in the area in the event of a fire. The Project Site is not located in a Very High Fire Hazard Severity Zone.<sup>41</sup> The Project Site is not located within a designated Fire Buffer Zone or Mountain Fire District in the 1996 City of Los Angeles Safety Element.<sup>42</sup> Therefore, no impact would occur. Further evaluation of this issue in an EIR is not required.

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<sup>40</sup> CA State Water Resources Control Board: <http://geotracker.waterboards.ca.gov/>

<sup>41</sup> City of Los Angeles, ZIMAS Parcel Profile Report, website: <http://zimas.lacity.org>.

<sup>42</sup> City of Los Angeles, Safety Element of the General Plan, Selected Wildfire Hazard Areas, Exhibit D.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>IX. Hydrology And Water Quality.</b> Would the project:				
a. Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off site?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Otherwise substantially degrade water quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g. Place housing within a 100-year flood plain as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h. Place within a 100-year flood plain structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j. Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response a:**

A significant impact may occur if a project discharges water that does not meet the quality standards of agencies that regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts would also occur if a project does not comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB). These regulations include compliance with the Standard Urban Storm Water Mitigation Plan (SUSMP) requirements to reduce potential water quality impacts. The Project involves the development of residential and commercial uses on land that is currently developed. The Project has the potential to alter the existing surface water runoff drainage pattern and rainfall absorption, causing a net increase of rates of storm water discharge which may exceed water quality standards or waste discharge requirements. Therefore, this potential impact on water quality standards or waste discharge requirements will be further analyzed in an EIR.

**Response b:**

A significant impact may occur if a project includes deep excavations which have the potential to interfere with groundwater movement, or includes withdrawal of groundwater or paving of existing permeable surfaces that are important to groundwater recharge. The Project does not propose any permanent groundwater wells or pumping activities. All water supplied to the Site would be derived from the City's existing water supply and infrastructure. However, it is possible that there would be an increase in the amount of impervious surfaces located on the Project Site upon completion of project construction. In addition, the construction would include excavation and could possibly require dewatering at the Site which might have a potentially significant impact on groundwater. The EIR will provide additional analysis to assess this potential impact.

**Response c:**

A significant impact may occur if a project would substantially alter drainage patterns resulting in a significant increase in erosion or siltation during construction or operation of a project. There are no natural watercourses on the Site. As part of the Project, grading and construction activities may temporarily alter the existing drainage patterns of the Site. If not properly designed, the Project could result in erosion and siltation during construction and operation that is potentially significant. Therefore, the EIR will provide analysis to assess this potential.

**Response d:**

A significant impact may occur if a project results in increased runoff volumes during construction or operation of the project would result in flooding conditions affecting the Project Site or nearby properties. Grading and construction activities on the Project Site may temporarily alter the existing drainage patterns of the Site and off-site flows, thereby having a potential impact. The EIR will provide additional analysis to assess the potential to result in impacts in drainage patterns.

**Response e:**

A significant impact may occur if a project would increase the volume of storm water runoff to a level which exceeds the capacity of the storm drain system serving the Project Site, or if the proposed project would introduce substantial new sources of polluted runoff. Construction of the project could contribute to the degradation of existing surface water quality conditions primarily due to: 1) potential erosion and sedimentation during the grading phase; 2) particulate matter from dirt and dust generated on the Site; and 3) construction activities and equipment. The EIR will provide analysis to assess the potential of the Project to result in these hydrology and water quality impacts.

**Response f:**

As previously discussed, the Project could involve the use of contaminants that could potentially degrade water quality if not properly handled and stored. Therefore, the EIR will provide additional analysis to assess this potential impact on hydrology and water quality impacts.

**Response g-h:**

The Project Site is not located within an area identified by Federal Emergency Management Agency (FEMA) as potentially subject to 100-year floods.<sup>43</sup> The Site is not located within a City-designated 100-year or 500-year flood plain.<sup>44</sup> As the Site is located in an area of minimal flooding, the Project would not introduce people or structures to an area of high flood risk. Therefore, the Project would not contain any significant risks of flooding and would not have the potential to impede or redirect floodwater flows. No impact would occur and no further analysis of this issue is required.

**Response i:**

A significant impact may occur if a project were located in an area where flooding, including flooding associated with dam or levee failure, would expose people or structures to a significant risk of loss, injury, or death. The Project Site is not located within an inundation area.<sup>45</sup> No further analysis of this issue is required.

**Response j:**

A significant impact may occur if a project is sufficiently close to the ocean or other water body to be potentially at risk of the effects of seismically-induced tidal phenomena (i.e., seiche and tsunami) or if the Site is located adjacent to a hillside area with soil characteristics that would indicate potential susceptibility to mudslides or mudflows. The Project Site is not located in a Tsunami Hazard Area, and is located at least 10 miles from the Pacific Ocean and is not near any major water bodies. Therefore, there is no impact associated with seiches or tsunamis at the Site. In addition, the Site is in an urbanized portion

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<sup>43</sup> *NavigateLA, FEMA Flood Hazard layer: <http://navigate.lacity.org/navigate/>, January 6, 2017.*

<sup>44</sup> *City of Los Angeles, Safety Element of the General Plan, 100-Year and 500-Year Flood Plains, Exhibit F.*

<sup>45</sup> *City of Los Angeles, Safety Element of the General Plan, Inundation and Tsunami Hazard Areas, Exhibit G.*

of the City of Los Angeles, and is relatively flat, thereby limiting the potential for inundation by mudflow. No further analysis of this issue is required.

Potentially Significant Impact	Less Than Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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**X.Land Use And Planning.** Would the project:

- |   |                                     |                          |                          |                                     |
|---|-------------------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Physically divide an established community?  | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Conflict with applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |
| c. Conflict with any applicable habitat conservation plan or natural community conservation plan?   | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**Response a:**

A significant impact may occur if a project is sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community (a typical example would be a project which involved a continuous right-of-way such as a roadway which would divide a community and impede access between parts of the community). The Project is not of a size or type to physically divide a community. The Site is within a largely industrial area with no established residential community. Therefore no impact would occur and no further analysis of this issue is required.

**Response b:**

A significant impact may occur if a project is inconsistent with the General Plan or zoning designations currently applicable to the Project Site and would cause adverse environmental effects, which the General Plan and zoning ordinance are designed to avoid or mitigate. The Project would require several discretionary actions by the City. The EIR will provide additional analysis to assess the potential impact from the project’s consistency with applicable General Plan policies, zoning code restrictions, Southern California Association of Governments (SCAG) policies, any other applicable City (such as the Central City Community North Plan) or regional plans and policies (such as the SCAQMD and Metro CMP).

**Response c:**

A significant impact may occur if a project is inconsistent with policies in any draft or adopted conservation plan. The Project Site has been developed and is located in an urbanized area. As discussed under Checklist Question IV(f), there is no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan that apply to the Site. Implementation of the Project would not conflict with any habitat conservation plans. Therefore, no impact would occur and no mitigation measures would be required. Further evaluation of this issue in an

EIR is not required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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**XI. Mineral Resources.** Would the project:

- |  |                          |                          |                          |                                     |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?                                 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**Response a:**

A significant impact may occur if a project is located in an area used or available for extraction of a regionally-important mineral resource, and if the project converted an existing or potential future regionally-important mineral extraction use to another use, or if the project affected access to a site used or potentially available for regionally-important mineral resource extraction. The Project Site is not located within any Major Oil Drilling Areas, which are 25 City designated major oil drilling areas. The nearest one is #21 Union Station Oil Field, a broad swath of land generally around Alameda and 4<sup>th</sup> Street.<sup>46</sup> The California Department of Conservation has online mapping of wells. No oil wells exist on the Project Site.<sup>47</sup> Therefore, the Project would have no impact with respect to loss of availability of a known regionally-important mineral resource and further evaluation is not required.

**Response b:**

A significant impact may occur if a project is located in an area used or available for extraction of a locally-important mineral resource extraction, and if the project converted an existing or potential future locally-important mineral extraction use to another use, or if the project affected access to a site used or potentially available for locally-important mineral resource extraction. Government Code Section 65302(d) states that a conservation element of the general plan shall address “minerals and other natural resources.” According to the Conservation Element of the City of Los Angeles General Plan, sites that contain potentially significant sand and gravel deposits which are to be conserved follow the Los Angeles River flood plain, coastal plain, and other water bodies and courses and lie along the flood plain from the San Fernando Valley through downtown Los Angeles. Much of the area around the Project Site has been

<sup>46</sup> City of Los Angeles Department of City Planning, *Safety Element Exhibit E, Oil Field and Oil Drilling Areas*: <http://cityplanning.lacity.org/cwd/gnlpln/safteyelt.pdf>, January 6, 2017.

<sup>47</sup> State of California Department of Conservation, *Division of Oil, Gas & Geothermal Resources, Online Mapping System, District 1*, website: <http://maps.conservation.ca.gov/doggr/#>, January 6, 2017.

developed with structures and is inaccessible for mining extraction.<sup>48</sup> Furthermore, the Project Site is developed and located in an urbanized area. Development of the Project would therefore not result in impacts associated with the loss or availability of a known mineral resource that would be of value to the region and the residents of the state. Therefore, no impact would occur and further evaluation of this issue in an EIR is not required.

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<sup>48</sup> *Conservation Element of the City of Los Angeles General Plan, September 16, 2001; pg II-57.*

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XII. Noise.</b> Would the project:				
a. Exposure of persons to or generation of noise in level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Exposure of people to or generation of excessive groundborne vibration or groundborne noise levels?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	■
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	■

**Response a:**

A significant impact may occur if the Project would generate excess noise that would cause the ambient noise environment at the Project Site to exceed noise level standards set forth in the City of Los Angeles General Plan Noise Element (Noise Element) and the City of Los Angeles Noise Ordinance. Construction would require the use of construction equipment during grading, excavation, hauling, establishing building foundations, and other construction activities. The concurrent use of construction equipment and machinery has the potential to increase noise levels above the applicable standards of the City’s Noise Ordinance as described in LAMC Section 112.03. The Project would increase the activities that would occur on the Site and noise levels from on-site sources also have the potential to increase during Project operation. In addition, the traffic attributable to the Project has the potential to cause noise levels to exceed City Noise Ordinance standards. Therefore, the potential impact from these noise increases will be analyzed further in an EIR.

**Response b:**

A significant impact would occur if the Project were to generate or expose people to excessive groundborne vibration or groundborne noise levels. Construction of the Project would require the use of heavy construction equipment during grading, excavation, hauling, establishing building foundations, and other construction activities. The use of earthmoving equipment and machinery has the potential to cause groundborne vibration and noise which could have a potentially significant impact. During operation, ground-borne vibration may also occur from increased road traffic or other on-site activities. Therefore, this issue will be analyzed further in an EIR.

**Response c:**

A significant impact may occur if the operation would introduce substantial new sources of noise or would substantially add to existing sources of noise within the vicinity of the Site. Traffic and human activity associated with the Project, as described above, have the potential to increase ambient noise levels above existing levels which could have a potentially significant impact. Therefore, this issue will be analyzed further in an EIR.

**Response d:**

A significant impact may occur if a project were to introduce substantial new sources of noise or substantially add to existing sources of noise within or in the vicinity of the Project Site during construction of the proposed project or on a periodic basis during the operation of the proposed project. As discussed above, construction activity has the potential to temporarily or periodically increase ambient noise levels above existing levels. In addition, the increase in on-site uses may also result in periodic increases in noise levels which could have a potentially significant impact. Therefore, this issue will be analyzed further in an EIR.

**Response e:**

A significant impact may occur if a project is located within an airport land use plan and would introduce substantial new sources of noise or substantially add to existing sources of noise within or in the vicinity of the Project Site during construction of the proposed project. As discussed under Checklist Question VIII(e), the Project Site is not located within an airport land use plan area or within two miles of a public airport or public use airport. The Project would therefore not expose people residing or working in the project area to excessive noise levels from an airport use. Therefore, no impact would occur and further evaluation of this issue is not required.

**Response f:**

This question would apply to a project only if it were in the vicinity of a private airstrip and would subject area residents and workers to a safety hazard. As discussed under Checklist Question VIII(f), there are no private airstrips in the vicinity of the Site. Therefore, no impact would occur.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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**XIII. Population And Housing.** Would the project:

a. Induce substantial population growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	■
c. Displace substantial numbers of people necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	■

**Response a:**

A significant impact may occur if a project would locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing population growth that would otherwise not have occurred as rapidly or in as great a magnitude. The Project would result in the generation of jobs (both for construction and operation) and would also result in an increased residential population which could induce potentially significant population growth.

The Project Site is located within the jurisdiction of the Southern California Association of Governments (SCAG). SCAG’s mandated responsibilities include development plans and policies with respect to the region’s population growth, transportation programs, air quality, housing, and economic development. In April 2016, SCAG adopted the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS). The 2016 RTP/SCS is an update to the 2012–2035 RTP/SCS that reflects changes in economic, policy, and demographic conditions.

The Project would not have indirect effects on growth through such mechanisms as the extension of roads and infrastructure since the Project would utilize the existing facilities. However, as the Project would introduce new residential units and employment opportunities, the Project’s growth contributions will be reviewed in the EIR for consistency with SCAG population and employment projections, as well as consistency with regional and local growth policies, including the City’s General Plan and Central City Community Plan.

**Response b:**

A significant impact may occur if a project would result in displacement of a substantial number of existing housing units, necessitating construction of replacement housing elsewhere. The Project would

not displace any housing since there is no housing on the Site. Further, the Project would develop residential units. Therefore, no impact would occur and further evaluation in an EIR is not required.

**Response c:**

A significant impact may occur if a project would result in displacement of existing residents, necessitating the construction of replacement housing elsewhere. The Project would not displace a substantial number of people necessitating the construction of replacement housing elsewhere. There is no existing housing on the Site. Therefore, no impact would occur and further evaluation in an EIR is not required.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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**XIV. Public Services.** Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

a. Fire protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Police protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Schools?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Parks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Other governmental services (including roads)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Response a:**

A significant impact may occur if the City of Los Angeles Fire Department (LAFD) could not adequately serve the Project based upon response time, access, or fire hydrant/water availability, necessitating the construction of a new or physically altered facility. The Project is served by:

- Fire Station No. 17, located at 1601 Santa Fe Avenue, approximately 2,200 feet from the Site.
- Fire Station No. 9, located at 430 7<sup>th</sup> Street, approximately 1.4 miles from the Site.
- Fire Station No. 4, located at 450 Temple Street, approximately 1.5 miles from the Site.
- Fire Station No. 25, located at 2927 Whittier Boulevard, approximately 1.9 miles from the Site.

The LAFD considers fire protection services for a project adequate if a project is within the maximum response distance for the land use proposed. Pursuant to LAMC Section 57.09.07A, the maximum response distance between residential land uses and a LAFD fire station that houses an engine or truck company is 1.5 miles; for a commercial land use the distance is 1 mile for an engine company and 1.5 miles for a truck company. The Project would increase the intensity of development at the Project Site, which has the potential for increased demand for fire protection services. This potential impact of the Project on fire protection services will be analyzed in the EIR.

**Response b:**

A significant impact may occur if the City of Los Angeles Police Department (LAPD) could not adequately serve the Project, necessitating a new or physically altered station. If existing service capacities are exceeded, new facilities, equipment and/or personnel may be required to maintain acceptable response times and service levels. The Project is within Reporting District 1309 of the Newton Community Police Station, located at 3400 South Central Avenue, is approximately 2.85 miles driving distance from the Project Site.<sup>49</sup> The Project would increase the intensity of development, resulting in a potentially significant impact on police protection services. This will be analyzed in the EIR.

**Response c:**

A significant impact may occur if a project includes substantial employment or population growth, which could generate a demand for school facilities that would exceed the capacity of the Los Angeles Unified School District (LAUSD). The Project Site is served by the following Los Angeles Unified School District (LAUSD) schools:

- 9<sup>th</sup> Street Elementary School (K-5), located at 835 Stanford Avenue
- Hollenbeck Middle School (6-8), located at 2510 East 6<sup>th</sup> Street
- Boyle Heights High School Zone of Choice:
  - Boyle Heights Science Tech Engineering Math High School (9-12), at 456 South Matthews Street
  - Theodore Roosevelt High School (9-12), at 456 South Matthews Street
  - Felicitas and Gonzalo Mendez High School (9-12), at 1200 Plaza Del Sol

The Project would directly impact local schools by providing new housing to families with school-age children, and indirectly impact schools by providing jobs that may cause employees with families to relocate to an area, thus necessitating new school facilities. The potential impact of the Project on school facilities will be analyzed in the EIR.

**Response d:**

A significant impact would occur if the available City of Los Angeles Department of Recreation and Parks (LADRP) recreation and park services could not accommodate a project, necessitating new or physically altered facilities and the construction of which could cause significant environmental impacts. The Project includes the development of residential uses that would increase the permanent residential population of the area. Residential developments typically have the greatest potential to result in impacts to parks since they generate a permanent increase in residential population. Therefore, there could be a

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<sup>49</sup> LAPD, Newton Station [http://www.lapdonline.org/newton\\_community\\_police\\_station](http://www.lapdonline.org/newton_community_police_station)

potentially significant impact from new parks or recreation facilities. The EIR will evaluate the Project's impacts on park facilities.

**Response e:**

A significant impact may occur if a project includes substantial employment or population growth that could exceed the capacity of public facilities (such as libraries), necessitating a new or physically altered library, the construction of which would have significant physical impacts on the environment. The Project is served by the Los Angeles Public Library (LAPL).<sup>50</sup>

- Benjamin Franklin Branch, located at 2200 East 1<sup>st</sup> Street.
- Little Tokyo Branch, located at 203 South Los Angeles.
- Stevenson Branch, located at 803 Spence Street.

Residential developments typically have the greatest potential to result in impacts to libraries since they generate a permanent increase in residential population. Therefore, the EIR will evaluate the Project's potential impacts upon library facilities.

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<sup>50</sup> <http://www.lapl.org/branches>

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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**XV. Recreation.**

- |  |   |                          |                          |                          |
|--|---|--------------------------|--------------------------|--------------------------|
| a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? | ■ | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?                        | ■ | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

**Response a:**

A significant impact may occur if the Project would include substantial employment or population growth that could generate an increased demand for public park facilities which exceeds the capacities of existing parks and/or cause premature deterioration of the park facilities. The Project involves the construction of new residential uses that could increase the demand for neighborhood and regional parks and recreational facilities in the area (see XIV, Parks). While on-site open space and recreational amenities would be included, the Project has the potential to increase demands upon several public park facilities located within the project area. The EIR will evaluate the potential of the Project to cause an increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur.

**Response b:**

As discussed above, the Project has the potential to increase demands upon recreational facilities that may in turn require the construction of new facilities or the expansion of existing facilities. The construction of these facilities may have an adverse physical effect on the environment. Therefore, the potential of such facilities to have an adverse effect on the environment will be analyzed in the EIR.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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**XVI. Transportation/Circulation.**

Would the project:

a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	■
d. Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Result in inadequate emergency access?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Response a:**

A significant impact would occur if the project generated traffic at each study intersection would exceed City of Los Angeles Department of Transportation (LADOT) standards. According to LADOT policy, a significant project impact would occur when the Critical Movement Analysis (CMA) value increases by 0.010 or more when the final Level of Service (LOS) at a given study intersection is E or F; by 0.020 or more when the final LOS is D; or by 0.040 or more when the final LOS is C. It is unknown at this time whether the Project may result in potentially significant traffic impacts during operation and construction. The potential impacts of the Project will be evaluated in a traffic study in accordance with the assumptions, methodology, and procedures approved by LADOT and will be in the EIR.

**Response b:**

A significant impact may occur if adopted California Department of Transportation (Caltrans) and County of Los Angeles Metropolitan Transit Authority (Metro) thresholds are exceeded. The Congestion Management Program (CMP) was adopted to regulate and monitor regional traffic growth and transportation improvement programs. The CMP designates a transportation network which includes all state highways and some arterials within the County of Los Angeles. If the level of service standard deteriorates on the CMP network, then local jurisdictions must prepare a deficiency plan that is in conformance with the Los Angeles County CMP. The intent of the CMP is to provide information to decision makers to assist in the allocation of transportation funds through the State Transportation Improvement Program (STIP) process. A CMP traffic impact analysis is required if a project would add 150 or more trips to the freeway, in either direction during either the AM or PM weekday peak hour. An analysis is also required at all CMP monitoring intersections where a project would add 50 or more peak hour trips. The local CMP requires that all CMP monitoring intersections be analyzed where a project would likely add 50 or more trips during the peak hours. It is unknown at this time whether the Project may result in a potentially significant traffic impact at any CMP monitoring locations. However, there could be an impact if levels of service standards are exceeded. Therefore, this issue will be analyzed further in an EIR.

**Response c:**

A significant impact would occur if a proposed project included an aviation-related use and would result in safety risks associated with such use. The Project does not include any aviation-related uses. Furthermore, as discussed under Checklist Question VIII(e), the Project Site is not located within an airport land use plan area or within two miles of a public airport or private use airport. Safety risks associated with a change in air traffic patterns would not occur. Therefore, no impact would occur and no mitigation measures would be required. Further evaluation of this issue in an EIR is not required.

**Response d:**

A significant impact may occur if a project includes new roadway design or introduces a new land use or project features into an area with specific transportation requirements, characteristics, or project access or other features designed in such a way as to create hazardous conditions. It is unknown at this time whether the Project may increase hazards due to a design feature. In addition, there could be a potentially significant impact if the driveway width and queuing length result in inadequate space to accommodate the vehicles for the Project. Therefore, this issue will be analyzed further in an EIR.

**Response e:**

A significant impact may occur if a project design does not provide emergency access meeting the requirements of the LAFD or in any other way threatens the ability of emergency vehicles to access and serve the Project Site or adjacent uses. The increased traffic during construction and operation could obstruct emergency vehicle access to the Project Site and adjacent uses in the Project vicinity. Therefore, the EIR will provide additional analysis to assess the potential to result in impacts on emergency access.

**Response f:**

A significant impact may occur if a project would conflict with adopted policies or involve modification to existing alternative transportation facilities located on- or off-site. There are transit stops nearby which could be impacted by the Project. The potential of the Project to decrease the performance of these facilities or conflict with adopted policies, plans, and programs supporting alternative transportation will be analyzed in the EIR.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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**XVII. Tribal Cultural Resources.** Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- |    |  |   |   |   |   |
|----|--|---|---|---|---|
| a. | Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?   | ■ | □ | □ | □ |
| b. | A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe? | ■ | □ | □ | □ |

**Response a:**

The Site contains a vacant industrial shed that was built in 1915 that will be retained and incorporated into the proposed development. The Site has never been previously surveyed for historic or architectural significance. Accordingly, the project could result in a potentially significant impact on a historical resource. Therefore, this issue will be analyzed further in an EIR.

**Response b:**

Assembly Bill 52 (AB 52) establishes a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in Public Resources Code §21074, as part of CEQA. As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The Native American Heritage Commission (NAHC) has provided a list of Native American groups and individuals who could have knowledge of the religious and/or cultural significance of resources that may be in and near the Project Site. An informational letter regarding the Project will be mailed concurrent with the NOP to Native American tribes known to have resources in this area. Therefore, this issue will be analyzed further in an EIR.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XVIII. Utilities.</b> Would the project:				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g. Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response a:**

A significant impact would occur if a project exceeds wastewater treatment requirements of the applicable Regional Water Quality Control Board. The City of Los Angeles Department of Public Works provides wastewater services for the Project Site. Wastewater discharges are conveyed to the Hyperion Treatment Plant (HTP), which is a public facility and is therefore subject to the State's wastewater treatment requirements which, in the project area, are enforced by the Los Angeles Regional Water Quality Control Board (LARWQCB). The Project would comply with federal, state, and local statutes and regulations related to wastewater discharge. Therefore, a less-than-significant impact would occur and no mitigation measures would be required. Further evaluation of this issue in an EIR is not required.

**Response b:**

A significant impact may occur if a project would increase water consumption or wastewater generation to such a degree that new facilities would be needed, the construction of which would cause significant environmental effects. The Project is expected to increase water usage and wastewater generated as compared to the existing uses on the Project Site. The HTP has a current capacity of 450 million gallons per day (mgd). The potentially significant impact with respect to the capacity of the water and wastewater treatment plants and the existing water and sewer lines that serve the Site will be analyzed in the EIR.

**Response c:**

A significant impact may occur if the volume of stormwater runoff were to increase to a level exceeding the capacity of the storm drain system serving the Project Site, to the extent that existing facilities would need to be expanded and the construction of which would cause significant environmental effects. The addition of new uses to the Project Site may require new or expanded stormwater facilities which could have a potentially significant impact. The potential of the Project to result in the construction of these new or expanded stormwater facilities will be analyzed in the EIR.

**Response d:**

A significant impact may occur if a project were to increase water consumption to such a degree that new water sources would need to be identified, or that existing resources would be consumed at a pace greater than planned for by purveyors, distributors, and service providers. The Project is estimated to consume an increase in water as compared to the existing uses on the Site, resulting in a potentially significant impact if new or expanded entitlements are needed. Water supply to the Project Site is provided by the LADWP. Buildout of the Project would create an increase in demand for water supplies compared to existing conditions on the Project Site. While the Project would incorporate various water-efficient design features pursuant to LAMC Section 122.03(a) and comply with Ordinance No. 170,978 (Water Management Ordinance) which imposes numerous water conservation measures for landscaped areas, further evaluation in an EIR is necessary to determine the impact on water supplies. Any potential impacts with respect to water supply will be analyzed within the EIR.

**Response e:**

A significant impact may occur if a project would increase wastewater generation to such a degree that the capacity of facilities currently serving the Project Site would be exceeded. As discussed under Checklist Question XVII(b), the Project is estimated to generate an increase in wastewater as compared to the existing development on the Site. Therefore, this potential impact related to wastewater treatment plant capacity and availability will be analyzed in the EIR.

**Response f:**

A significant impact may occur if a project were to increase solid waste generation to a degree such that the existing and projected landfill capacity would be insufficient to accommodate the additional solid

waste. Solid waste generated in the City is disposed of at various landfill facilities located throughout Los Angeles County. Compared to existing conditions, the Project would generate additional solid waste from demolition debris, site preparation, and construction activities, as well as during operation of the Project. Since the Project will result in an increase in residents and users, there could be a potentially significant impact if those solid waste disposal needs are not accommodated by a landfill. Therefore, the potential impacts associated with the ability of the local landfills to serve the Project will be analyzed in the EIR.

**Response g:**

Solid waste management is guided by the California Integrated Waste Management Act of 1989, which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. The Act requires that localities conduct a Solid Waste Generation Study (SWGS) and develop a Source Reduction Recycling Element (SRRE). The City of Los Angeles prepared a Solid Waste Management Policy Plan that was adopted by the City Council in 1994. Solid waste generated on-site by the Project would be disposed of in accordance with all applicable federal, state, and local regulations and policies related to solid waste, including (but not limited to) AB 939, CiSWMPP, SRRE, Ordinance No. 171687 and the Framework Element of the General Plan. The Project would provide clearly marked, durable, source sorted recycling bins throughout the Project Site to facilitate recycling in accordance with Ordinance No. 171687. The Project would comply with federal, state, and local statutes and regulations related to solid waste. Therefore, a less-than-significant impact would occur and no mitigation measures would be required. Further evaluation of this issue in an EIR is not required.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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**XIX. Mandatory Findings Of Significance.**

- |    |   |   |                          |                          |                          |
|----|---|---|--------------------------|--------------------------|--------------------------|
| a. | Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? | ■ | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. | Does the project have impacts which are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).  | ■ | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c. | Does the project have environmental effects which cause substantial adverse effects on human beings, either directly or indirectly?   | ■ | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

**Response a:**

Based on the analysis contained in this Initial Study, the project has the potential to result in significant impacts with regard to the issues addressed herein. Therefore, the Project has the potential to degrade the quality of the environment. An EIR will be prepared to analyze and document these potentially significant impacts. All feasible mitigation measures will be identified to reduce the identified significant impacts.

**Response b:**

The potential for cumulative impacts occurs when the independent impacts of the project are combined with the impacts of related projects in proximity to the Project Site such that impacts occur that are greater than the impacts of the project alone. Located within the vicinity of the Project Site are other past, current, and/or reasonably foreseeable projects whose development, in conjunction with that of the project, may contribute to potential cumulative impacts. Impacts of the Project on both an individual and cumulative basis will be addressed in an EIR. Therefore, the potential for cumulative impacts related to aesthetics, air quality, cultural resources, geology and soils, greenhouse gas emissions, hazards/hazardous materials, hydrology/water quality, land use and planning, noise, population and housing, transportation and traffic, and utilities and service systems resulting from the project in conjunction with the applicable

related projects will be analyzed and documented in an EIR. The potential for significant cumulative impacts from the other environmental issues that are not to be evaluated and documented in the EIR can be assessed at this time. Cumulative impacts are concluded to be less than significant for those issues for which it has been determined that the project's incremental contribution would be less than significant. Therefore, only those aspects of the Project to be analyzed and documented in an EIR are concluded to have the potential for significant cumulative impacts

**Response c:**

As discussed above, construction and operation of the project could result in environmental effects that could have substantial adverse effects on human beings, either directly or indirectly. As a result, these potential effects will be analyzed further in an EIR.