

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

CENTRAL CITY NORTH COMMUNITY PLAN AREA

6AM Project

Case Number: ENV-2016-3758-EIR

Project Location: 1206–1338 East 6th Street/1205–1321 Wholesale Street, Los Angeles, CA 90021

Council District: 14

Project Description: The Project includes an integrated mix of residential, community-serving commercial, hospitality, educational, office, and cultural uses within seven new buildings dispersed across the Project Site. Specifically, the Project would provide 412 hotel guest rooms with related conference and hotel amenities, 1,305 residential apartments, 431 residential for-sale condominium units, approximately 253,514 square feet of office space, an approximately 29,316-square-foot school, approximately 127,609 square feet of community-serving commercial space, and approximately 22,429 square feet of art space. In total, the Project includes approximately 2,824,245 square feet of floor area with an associated floor area ratio (FAR) of 4.44 to 1 based on the lot area of 635,566 after street dedications. The Project would also provide 3,441 parking spaces to accommodate the proposed uses. To provide for the new uses, the existing produce warehouse and distribution facility would be removed.

The Project would involve the development of a range of building types and heights that are based on the existing building typologies that are present within the Project vicinity. Specifically, the Project would include seven buildings that would range in height from 110 feet to up to 732 feet. The design of the Project is intended to incorporate rough, “authentic,” and typical industrial construction materials, consistent with existing buildings in the Arts District.

The Project would also include a number of open space areas and recreational amenities spread within all seven of the proposed buildings and their surroundings. Open space and recreational amenities would include promenades, walkways that would provide connectivity throughout the Project Site, outdoor pool and amenity decks and terraces for the residential and hotel uses, a school park, numerous outdoor plazas and courtyards for use by the public, and private residential balconies.

APPLICANT:

Sixth and Alameda, LLC

PREPARED BY:

Eyestone Environmental

ON BEHALF OF:

The City of Los Angeles
Department of City Planning
Environmental Analysis Section

FEBRUARY 2017

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CITY OF LOS ANGELES

OFFICE OF THE CITY CLERK
ROOM 615, CITY HALL
LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT

INITIAL STUDY AND CHECKLIST

(Article IV B City CEQA Guidelines)

LEAD CITY AGENCY City of Los Angeles Department of City Planning	COUNCIL DISTRICT 14	DATE February 2017
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RESPONSIBLE AGENCIES

Potentially including, but not limited to, the Regional Water Quality Control Board, and South Coast Air Quality Management District.

PROJECT TITLE/NO.

6AM

CASE NO.

ENV-2016-3758-EIR

PREVIOUS ACTIONS CASE NO.

DOES have significant changes from previous actions.

DOES NOT have significant changes from previous actions.

PROJECT DESCRIPTION:

The Project includes an integrated mix of residential, community-serving commercial, hospitality, educational, office, and cultural uses within seven new buildings dispersed across the site. Specifically, the Project would provide 412 hotel guest rooms with related conference and hotel amenities, 1,305 residential apartments, 431 residential for-sale condominium units, approximately 253,514 square feet of office space, an approximately 29,316-square-foot school, approximately 127,609 square feet of community-serving commercial space, and approximately 22,429 square feet of art space. In total, the Project includes approximately 2,824,245 square feet of floor area with an associated floor area ratio (FAR) of 4.44 to 1.

ENVIRONMENTAL SETTING:

The Project Site is located in a highly urbanized area. To the north, across 6th street are a variety of light industrial and commercial uses that include restaurants and live-work spaces. To the south are light industrial uses that include cold storage, brewery and warehouse and distribution facility uses. East of the Project Site across Mill Street is a six-story building currently used by a mix of uses, including ETO Doors, as well as other distribution, warehouse, and creative loft uses. To the west across Alameda Street is a Metro facility that includes maintenance and storage of buses.

PROJECT LOCATION

The Project Site is located within the Central City North Community Plan area of the City of Los Angeles. The approximately 15-acre Project Site is specifically bounded by 6th Street to the north, Mill Street to the east and Alameda Street to the west.

PLANNING DISTRICT

Central City North Community Plan

STATUS:

PRELIMINARY

PROPOSED _____

ADOPTED 2000

EXISTING ZONING M3-1-RIO Heavy Industrial	MAX. DENSITY ZONING 1.5:1	<input type="checkbox"/> DOES CONFORM TO PLAN <input checked="" type="checkbox"/> DOES NOT CONFORM TO PLAN <input type="checkbox"/> NO DISTRICT PLAN
PLANNED LAND USE & ZONE Hybrid Industrial Specific Plan	MAX. DENSITY PLAN Please refer to Attachment A	
SURROUNDING LAND USES Industrial, Commercial and Residential	PROJECT DENSITY Please refer to Attachment A	



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.

Emi Stelah

City Planning Associate

SIGNATURE

TITLE

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of a mitigation measure has reduced an effect from “Potentially Significant Impact” to “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, “Earlier Analysis,” 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 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"/> Hazards & Hazardous Materials | <input checked="" type="checkbox"/> Recreation |
| <input type="checkbox"/> Agricultural and Forestry Resources | <input checked="" type="checkbox"/> Hydrology/Water Quality | <input checked="" type="checkbox"/> Transportation/Traffic |
| <input checked="" type="checkbox"/> Air Quality | <input checked="" type="checkbox"/> Land Use/Planning | <input checked="" type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Mineral Resources | <input checked="" type="checkbox"/> Utilities/Service Systems |
| <input checked="" type="checkbox"/> Cultural Resources | <input checked="" type="checkbox"/> Noise | <input checked="" type="checkbox"/> Mandatory Findings of Significance |
| <input checked="" type="checkbox"/> Geology/Soils | <input checked="" type="checkbox"/> Population/Housing | |
| <input checked="" type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Public Services | |

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

 **BACKGROUND**

PROPONENT NAME

Sixth and Alameda, LLC

PROPONENT ADDRESS

2392 Morse Avenue, Irvine, CA 92614

AGENCY REQUIRING CHECKLIST

City of Los Angeles, Department of City Planning

PROPOSAL NAME (If Applicable)

6AM

PHONE NUMBER

(310) 739-0356

DATE SUBMITTED

February 2017

 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
I. AESTHETICS. 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 within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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"/>
II. AGRICULTURE AND FOREST 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 and Range Assessment Project and the 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 (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

a. Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<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 checked="" type="checkbox"/>	<input type="checkbox"/>

IV. BIOLOGICAL RESOURCES. Would the project:

a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, by the California Department of Fish and Wildlife 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 checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

V. CULTURAL RESOURCES: Would the project:

a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input checked="" type="checkbox"/>	<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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Disturb any human remains, including those interred outside of dedicated cemeteries (see Public Resources Code, Ch. 1.75, §5097.98, and Health and Safety Code §7050.5(b))?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

VI. GEOLOGY AND SOILS. Would the project:

a. Expose 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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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 on the environment? | <input checked="" type="checkbox"/> | <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 checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

VIII. HAZARDS AND HAZARDOUS MATERIALS. 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 checked="" type="checkbox"/> | <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 checked="" type="checkbox"/> | <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 checked="" type="checkbox"/> | <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 checked="" type="checkbox"/> | <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"/> | <input checked="" type="checkbox"/> |
| f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | <input checked="" type="checkbox"/> | <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 checked="" type="checkbox"/> | <input type="checkbox"/> |

IX. HYDROLOGY AND WATER QUALITY. Would the project:

- | | | | | |
|-------------------------------------------------------------------------|-------------------------------------|--------------------------|--------------------------|--------------------------|
| a. Violate any water quality standards or waste discharge requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|-------------------------------------------------------------------------|-------------------------------------|--------------------------|--------------------------|--------------------------|

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<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 hazard area as mapped on a 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 hazard area 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 checked="" type="checkbox"/>	<input type="checkbox"/>
j. Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
X. LAND USE AND PLANNING. Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<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"/>
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 checked="" type="checkbox"/>	<input type="checkbox"/>

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

XII. NOISE. Would the project result in:

a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<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 checked="" type="checkbox"/>	<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 checked="" type="checkbox"/>	<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"/>	<input checked="" type="checkbox"/>
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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 checked="" type="checkbox"/>	<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"/>	<input checked="" type="checkbox"/>
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

XIV. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

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"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 public facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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 checked="" type="checkbox"/>	<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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

XVI. TRANSPORTATION/TRAFFIC. 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input checked="" type="checkbox"/>	<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"/>	<input checked="" type="checkbox"/>
d. Substantially increase hazards due 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"/>	<input checked="" type="checkbox"/>
e. Result in inadequate emergency access?	<input checked="" type="checkbox"/>	<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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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XVII. TRIBAL CULTURAL RESOURCES.

- a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
- i. 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), or
 - ii. 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.

XVIII. UTILITIES AND SERVICE SYSTEMS. Would the project:

- a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?
- b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?
- c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?
- d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?
- e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?
- f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?
- g. Comply with federal, state, and local statutes and regulations related to solid waste?
- h. Other utilities and service systems?

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



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

PREPARED BY	TITLE	TELEPHONE #	DATE
Stephanie Eyestone-Jones Eyestone Environmental	President	(424) 207-5333	February 2017

A. Project Description

Attachment A: Project Description

1. Introduction

Sixth and Alameda, LLC, the Applicant, proposes a comprehensive development project on an approximately 15-acre¹ site located at 6th Street and Alameda Street within the Central City North Community Plan area of the City of Los Angeles (the Project). The Project includes an integrated mix of residential, community-serving commercial, hospitality, educational, office, and cultural uses within seven new buildings dispersed across the site. Specifically, the Project would provide 412 hotel guest rooms with related conference and hotel amenities, 1,305 residential apartments, 431 residential for-sale condominium units, approximately 253,514 square feet of office space, an approximately 29,316-square-foot school, approximately 127,609 square feet of community-serving commercial space, and approximately 22,429 square feet of art space. In total, the Project includes approximately 2,824,245 square feet of floor area with an associated floor area ratio (FAR) of 4.44 to 1 based on the lot area of 635,566 after street dedications. The Project would also provide 3,441 parking spaces to accommodate the proposed uses. To provide for the new uses, the existing produce warehouse and distribution facility would be removed.

2. Project Location and Setting

As shown in Figure A-1 on page A-2, the Project Site is located within the Arts District area of the City of Los Angeles (City), approximately 14 miles east of the Pacific Ocean. Primary regional access is provided by the Hollywood Freeway (US-101), the Santa Monica Freeway (I-10), and the Golden State Freeway (I-5), which are all accessible within approximately 1 mile of the Project Site. The approximately 15-acre Project Site is specifically bounded by 6th Street to the north, Mill Street to the east, Alameda Street to the west, and property to the south currently developed with cold-storage uses that is proposed for redevelopment with residential and commercial uses.² Major arterials

¹ *The Project Site is specifically comprised of 657,215 square feet of gross lot area and 635,566 square feet of net lot area after street dedications*

² *There is a 30-foot strip of land adjacent to the south labeled as Wholesale Street on the City's ZIMAS map. However, this is not public right-of-way and the land is privately owned.*

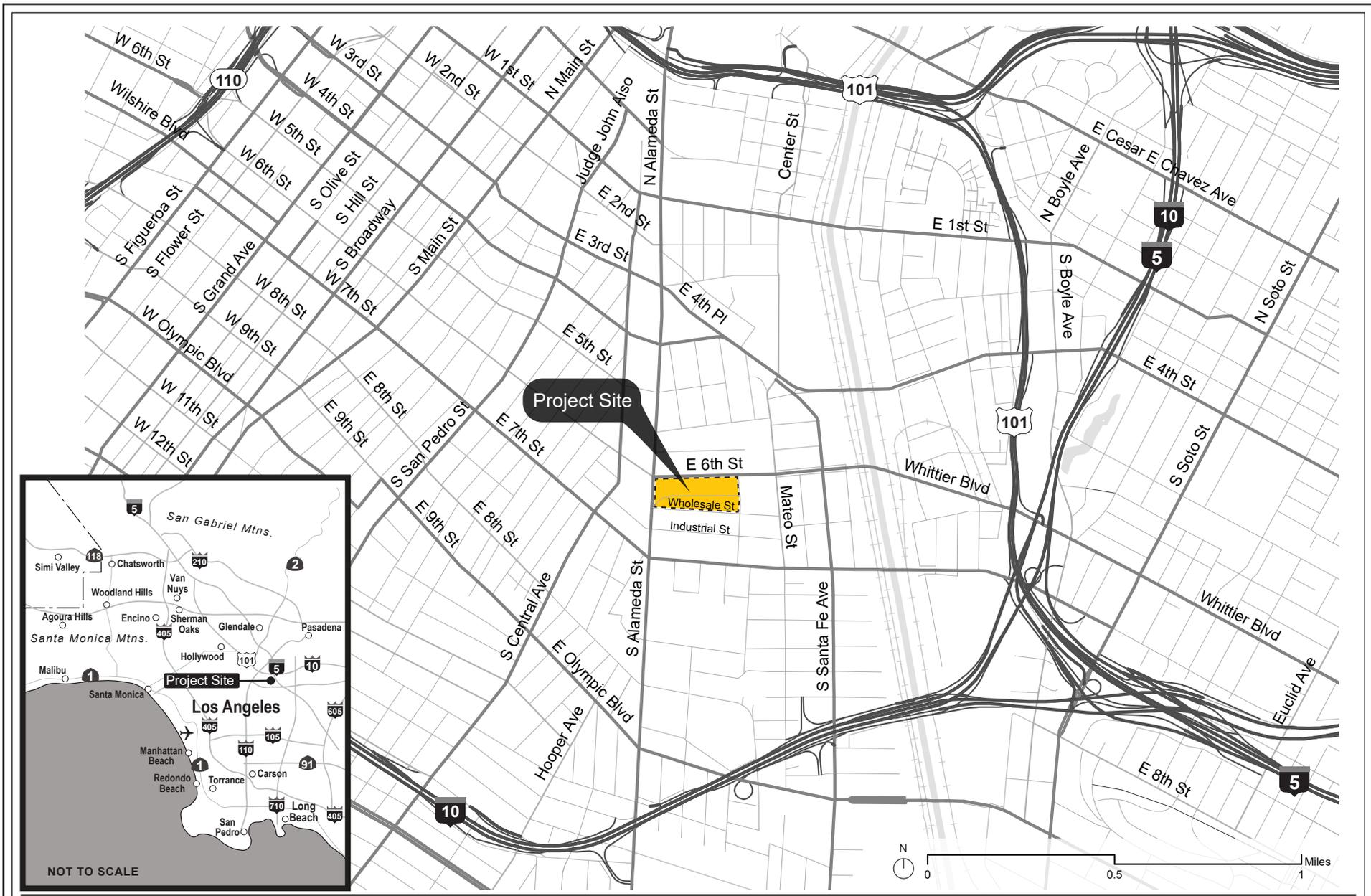


Figure A-1
Project Location Map

Source: Los Angeles County GIS, 2015; Eystone Environmental, 2016.

providing regional access to the Project vicinity include 6th Street, 7th Street, Central Avenue, and Alameda Street, which provides access to Union Station. In addition, the Metro Gold Line and Regional Connector Little Tokyo/Arts District station is located approximately 0.8 mile north of the Project Site.

The Project Site is located within the Arts District area, which is undergoing rapid transformation. The Arts District continues to expand beyond its historic boundaries of 1st Street to the north, the Los Angeles River to the east, 6th Street to the south, and Alameda Street to the west. In particular, expansion continues south of 6th Street toward the I-10 Freeway with significant growth in mixed-use residential and commercial development. Former industrial and warehouse buildings restored and converted to residential lofts and live-work spaces are prevalent throughout the Arts District as are artist spaces and galleries, creative office and shared incubator spaces, coffee roasters, restaurants, breweries, and boutique retail shops. In addition, several ground up residential and mixed-use developments have been built, are under construction, or are planned throughout the Arts District.

As shown in Figure A-2, Aerial Photograph of the Project Vicinity, on page A-4, the Project vicinity is developed with a mix of light industrial, commercial and residential uses. To the north, across 6th street are a variety of light industrial and commercial uses that include restaurants and live-work spaces. To the south of the Project Site are light industrial uses that include cold storage, brewery and warehouse and distribution facility uses. East of the Project Site across Mill Street is a six-story building currently used by a mix of uses, including ETO Doors, as well as other distribution, warehouse, and creative loft uses. To the west across Alameda Street is a Metro facility that includes maintenance and storage of buses.

The Project Site is also located one block from the \$450 million 6th Street Viaduct project that is currently under construction and will be a two-way multi-modal bridge with dedicated bicycle lanes that will span the Los Angeles River and connect to the historic Boyle Heights neighborhood to the east. Plans also call for new recreational green spaces on former industrial sites underneath the new bridge.

3. Existing Project Site Conditions

a. Existing Conditions

As shown in Figure A-2, Aerial Photograph of the Project Vicinity, the Project Site is currently developed with a produce warehouse and distribution facility that is comprised of two single-story buildings totaling approximately 316,632 square feet. Parking for

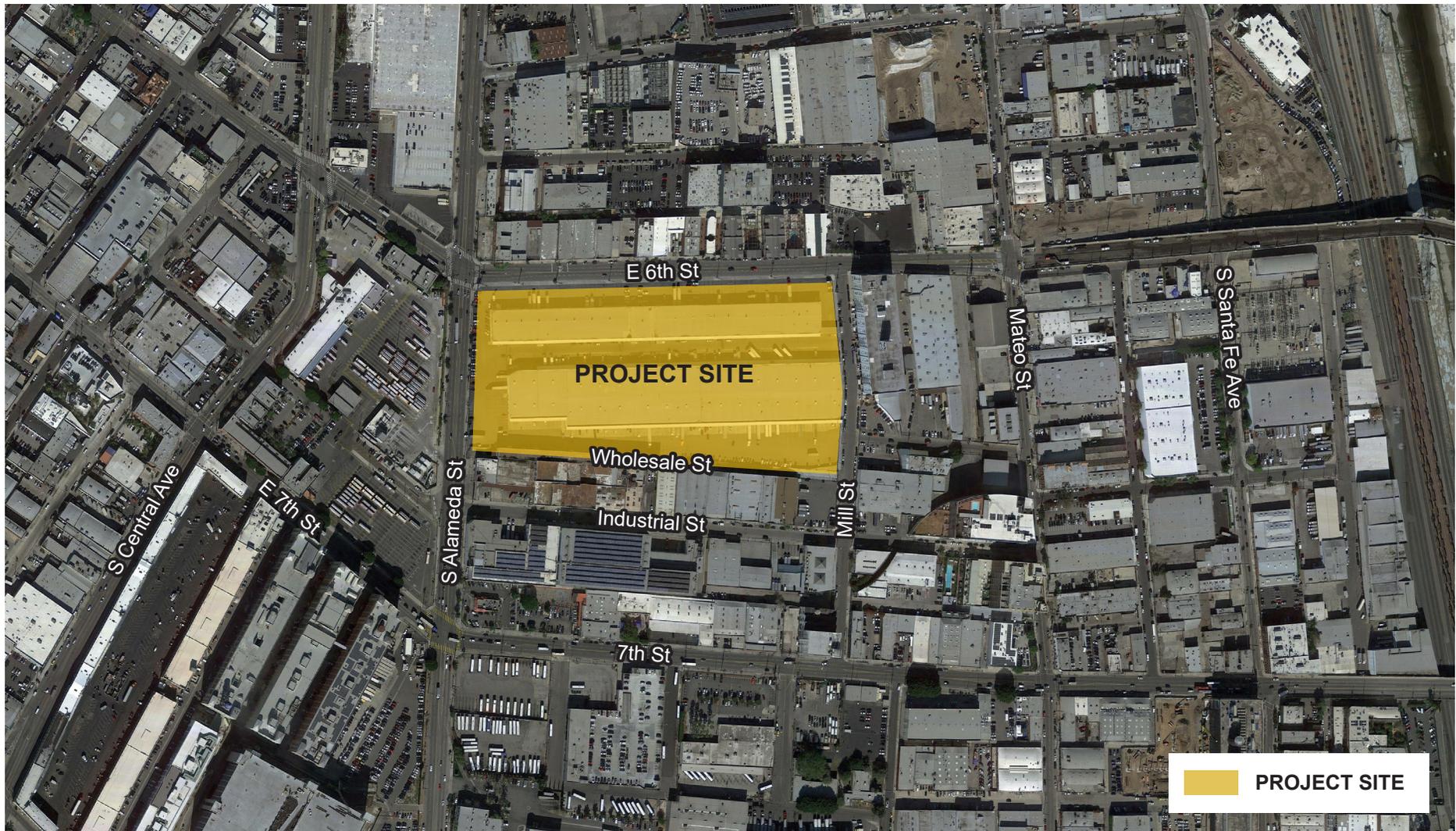


Figure A-2
Aerial Photograph of Project Vicinity

199 automobiles and for 122 tractor trailer trucks is provided on-grade in open asphalt and concrete paved parking areas.

The Project Site is relatively flat with limited ornamental landscaping. There are seven street trees located along the perimeter of the Project Site that would be removed as part of the Project. Six of the street trees are located along Alameda Street, and the remaining street tree is located along 6th Street. None of the street trees are of species that are protected by the City of Los Angeles.

b. Existing Land Use and Zoning

The Project Site is located within the Central City North Community Plan Area and is also located within the East Los Angeles Enterprise Zone. The Project Site is zoned M3-1-RIO by the Los Angeles Municipal Code (LAMC) with a General Plan land use designation of Heavy Manufacturing. The corresponding zone for Heavy Manufacturing is the M3 Zone. The M3-1 designation indicates that the Project Site is located in Height District 1, which does not specify a building height limit, but rather limits the FAR to 1.5 to 1. The RIO designation is for the City's River Improvement Overlay ("RIO") district, which 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, among many other things. The Project Site is adjacent to the Artists-in-Residence District ("AIR District") as identified in the Central City North Community Plan. Established in 2000, the AIR District is bounded by 1st Street to the north, the Los Angeles River to the east, 6th Street to the south, and Alameda Street to the west.

4. Description of the Project

a. Project Overview

The Applicant proposes to develop a comprehensive development project totaling approximately 2,824,245 square feet of floor area on a 15 acre site located in the Arts District of Los Angeles. As presented in Table A-1 on page A-6, the Project would provide 412 hotel guest rooms with related conference and hotel amenities, 1,305 residential apartments, 431 residential for-sale condominium units, approximately 253,514 square feet of office space, an approximately 29,316-square-foot school, approximately 127,609 square feet of community-serving commercial uses, and approximately 22,429 square feet of art space. Upon completion, new development would have a FAR of 4.44 to 1. General locations of the proposed uses are provided in the axonometric overview included as Figure A-3 on page A-7. The Project would also provide 3,441 parking spaces to accommodate the proposed uses. To provide for the new uses, the existing produce warehouse and distribution facility would be removed.

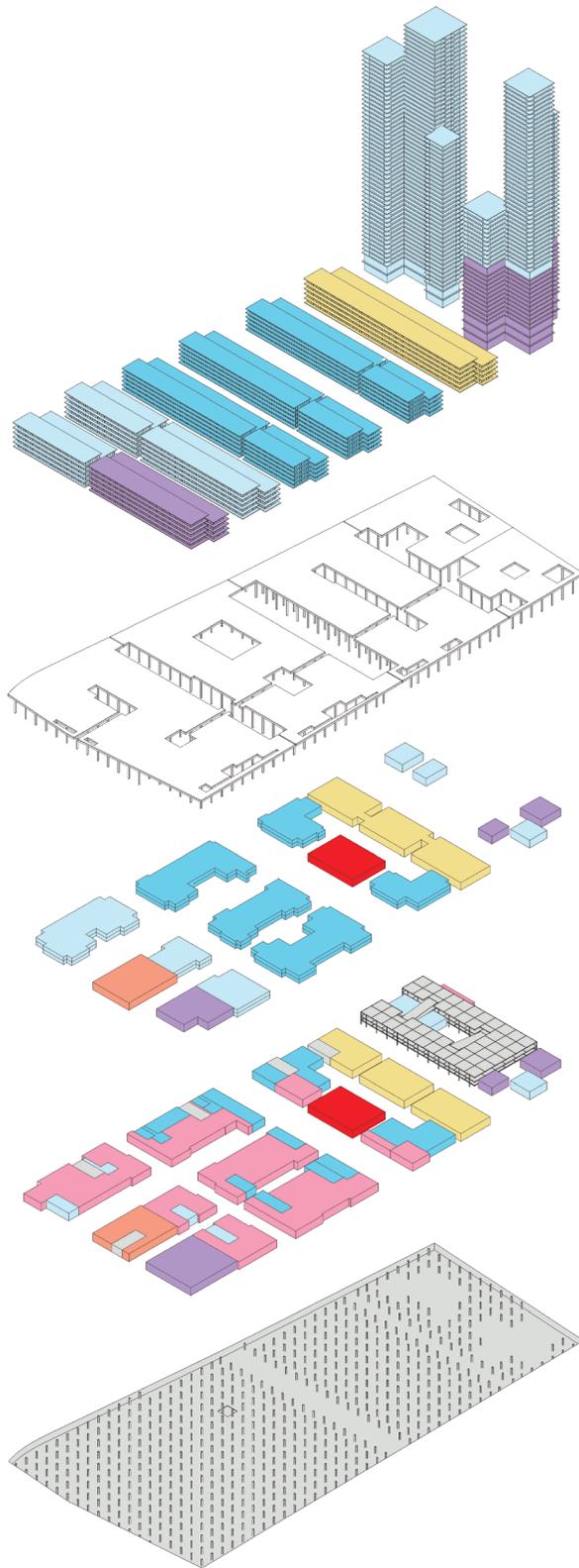
**Table A-1
Summary of Proposed Development**

Land Use	Floor Area^a
Residential—Rental	1,305 du (1,294,328 sf)
Residential—Condominium	431 du (667,826 sf)
Hotel	412 guest rooms (429,223 sf)
Art Space	22,429 sf
Office	253,514 sf
Neighborhood School	29,316 sf
Community-Serving Commercial	
Restaurant/Food Hall	68,256 sf
Retail	39,569 sf
Specialty Grocery Market	19,784 sf
Total Floor Area	2,824,245 sf
<p><i>sf = square feet</i> <i>du = dwelling units</i> ^a <i>Square footage is calculated pursuant to the LAMC definition of floor area for the purpose of calculating FAR. In accordance with LAMC Section 12.03, floor area is defined as “[t]he area in square feet confined within the exterior walls of a building, but not including the area of the following: exterior walls, stairways, shafts, rooms housing building-operating equipment or machinery, parking areas with associated driveways and ramps, space for the landing and storage of helicopters, and basement storage areas.”</i> <i>Source: AC Martin Architects, 2016.</i></p>	

b. Building Design

As shown in the elevations and renderings provided in Figure A-4 through Figure A-10 on pages A-8 to A-14, the Project would involve development of a range of building types and heights that are based on the unique building typologies that are present within the Project vicinity. These building typologies include the following:

- Low-rise, former warehouse buildings, often with brick façades, typically built in the early 1900s. These buildings include bow-truss, brick-surfaced buildings, with roof lines running north-south and are typically 40 feet in height.



LEGEND PROGRAM DISTRIBUTION

- RESIDENTIAL
- STUDIO (S)
- 1 BEDROOM (1B)
- 2 BEDROOM (2B)
- 3 BEDROOM (3B)
- RETAIL
- HOTEL
- OFFICE
- SCHOOL
- ART PROGRAM

Figure A-3
Axonometric Overview

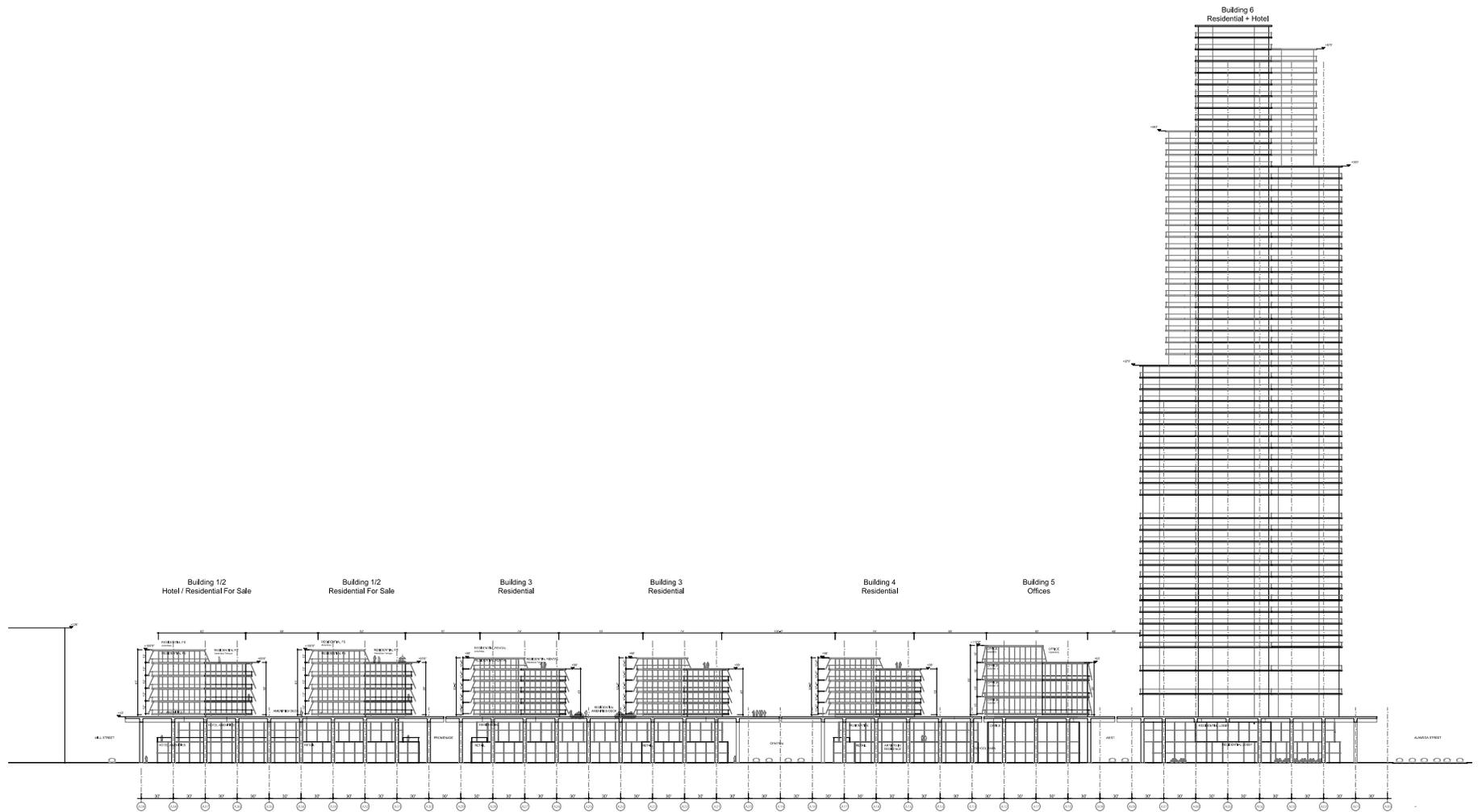


Figure A-4
North Elevation

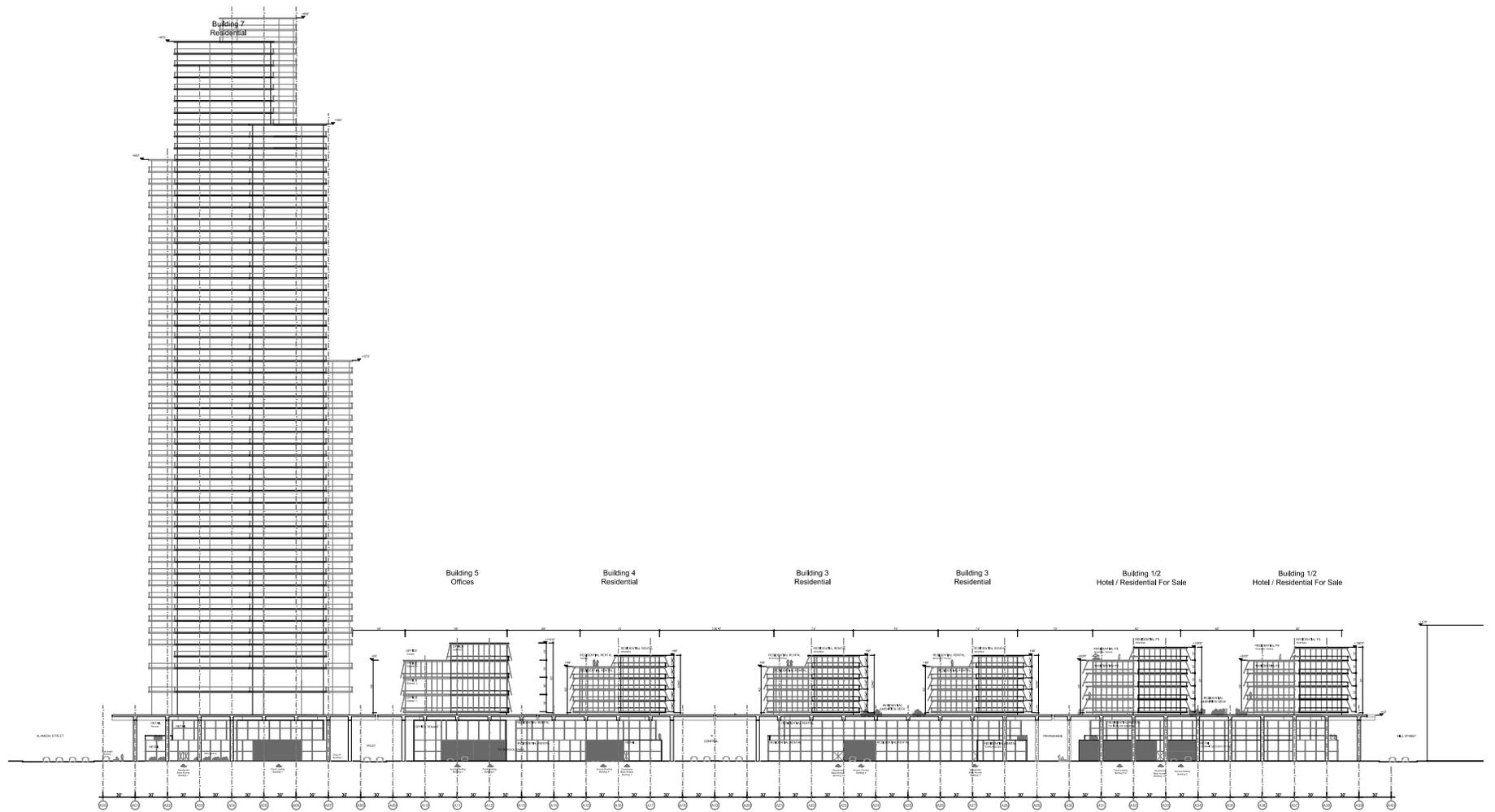


Figure A-5
South Elevation

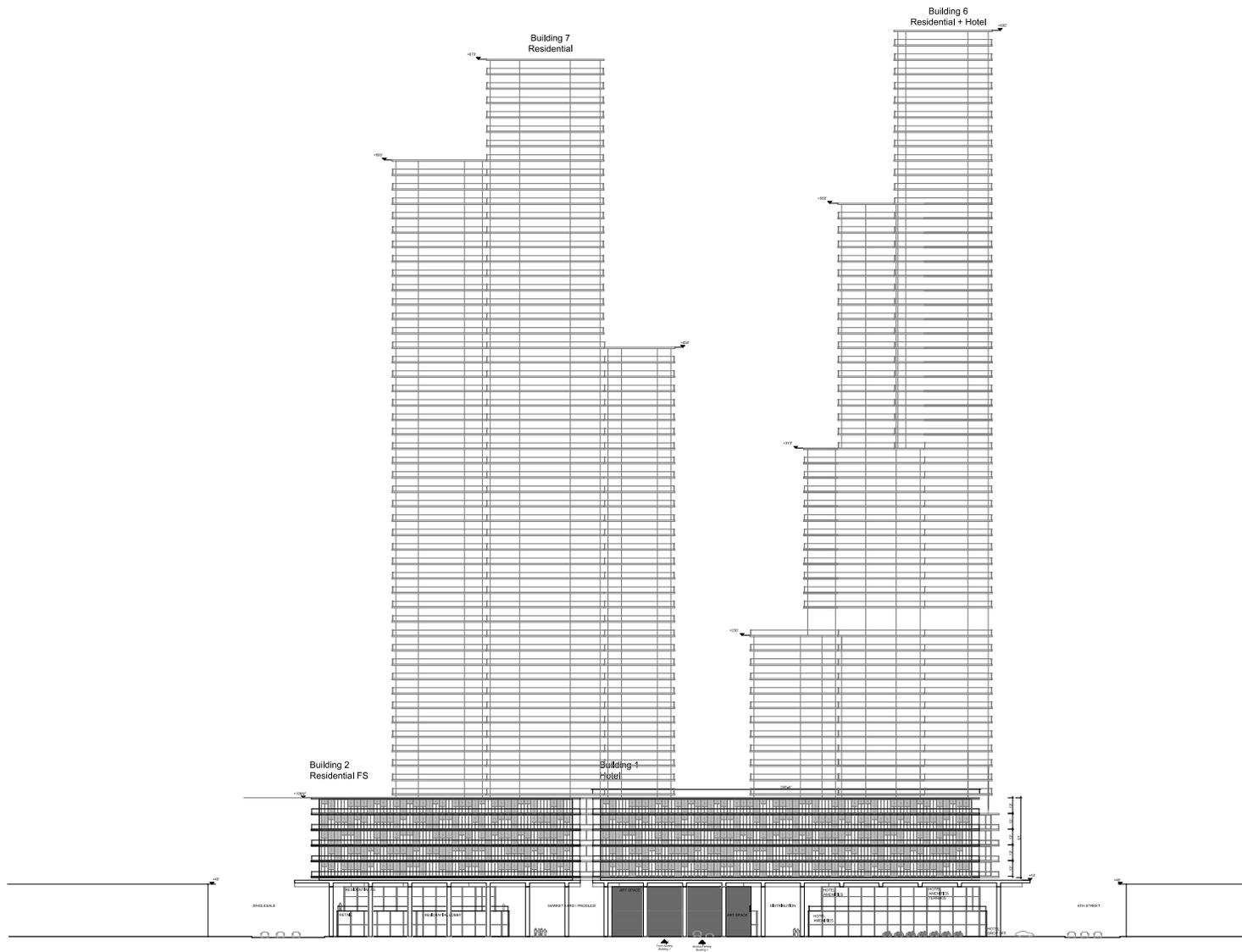


Figure A-6
East Elevation

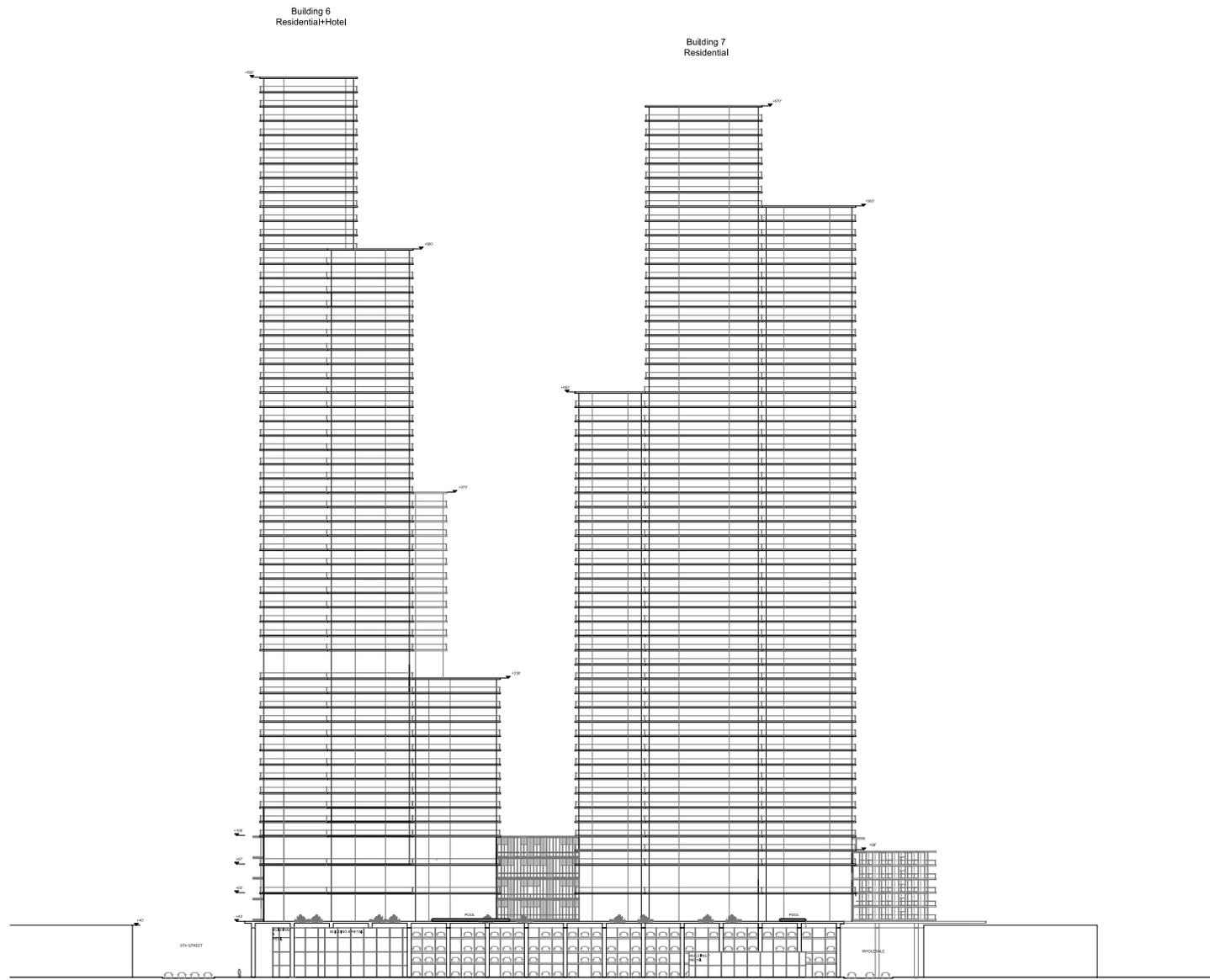


Figure A-7
West Elevation



Figure A-8
Rendering from Alameda Street



Figure A-9
Rendering from 6th Street



Figure A-10
Rendering from 6th Street at Mill Street

- Larger, often long and narrow, mid-rise former warehouse and manufacturing buildings that stand out in the neighborhood and surround the Project Site. These include the Toy Factory Lofts, Biscuit Lofts, The Row (formerly Alameda Square), and the ETO door factory immediately east of the Project Site. These buildings are large and utilitarian, typically approximately 130 to 150 feet in height.
- Small, intimate passageways located between the former industrial buildings. These alleyways, often former rail alignments, incorporate several the Art District's social spaces, including Daily Dose coffee, Bar Mateo, and Bestia restaurant. These spaces tend to be long, narrow, shaded, and lined with "unexpected" local retail and food selections.
- The nearby Downtown skyline—the 50-story and taller buildings of the Financial District that define the Los Angeles skyline, are visible, even from ground level, in the Arts District.

Guided by these typologies, the design for the Project Site is based on the concept of a "Fabric," "Fingers," and "Needles." As shown in Figure A-3 on page A-7, the Fabric is defined by a horizontal "Table" slab at an elevation of 40 feet, respecting the height of surrounding buildings, with two to three levels underneath it that include retail, restaurants, and other uses. A series of pedestrian walkways and plazas connect these uses and traverse through the Project Site. The Fabric provides opportunities for unique ground-floor spaces to accommodate grocery, food hall, entertainment, and commercial businesses. The lower levels of the Fabric would also include arts development and production spaces, live/work units, arts exhibition spaces, a school for neighborhood children, and hotel, residential and office lobbies.

Above the Fabric are a series of six "Finger" buildings, with four to five levels above the Table, housing residential units with both apartments and condominiums, office space, and a hotel located at the corner of 6th Street and Mill Street. These buildings reflect the mid-rise building typology noted above. The buildings are intended to be highly efficient, somewhat industrial in character, and fit within the context of surrounding structures, such as The Row, ETO Doors, and the Biscuit and Toy Factory Lofts.

The Project also proposes two 58-story towers with residential and hotel uses that comprise the Needles. These articulated towers, positioned along the Alameda Street frontage, respond to the shapes and scale of the Downtown skyline. Concentration of the towers and the densest part of the Project along Alameda Street is intended to establish Alameda Street as an urban boulevard that can be continued north and south, preserving the integrity of the Fabric as a mid-rise environment in the Arts District, and also providing maximum shade to the Finger buildings in summer months and maximum sunlight in winter

months. The denser portion of the Project would also be located adjacent to the proposed light rail station on Alameda Street

The design is also intended to incorporate rough, “authentic,” and typical industrial construction materials. The buildings are proposed as Type I, concrete-frame, fire-resistant, and durable buildings, consistent with the existing Arts District building types. Further, the design is intended to encourage murals and other types of artistic expression.

An overview of the seven primary buildings proposed within the Project Site is provided below.

Building 1: Boutique Hotel

Building 1, located at the corner of 6th Street and Mill Street, would include a boutique hotel with approximately 152 guest rooms and 22,429 square feet of art space. The total floor area within Building 1 would comprise approximately 182,688 square feet. The lower levels below that Table would include the main hotel lobby, hotel amenity and function space, and art space. Above the Table, levels four through seven would contain the hotel guest rooms with deck balconies. The eighth level would include an approximately 12,763-square-foot hotel amenity function space with outdoor amenity deck. The total proposed height of Building 1 is approximately 118.5 feet, excluding building equipment penthouses. Building 1 would also incorporate 160 parking spaces for the hotel and art uses.

Building 2: Mixed-Use Residential Condominiums and Community-Serving Commercial Uses

Building 2 would include eight levels that would be approximately 118.5 feet in height, excluding equipment penthouses. Building 2 would include 245 residential condominiums and approximately 41,852 square feet of community-serving commercial uses that may include several restaurants and a grocery market. The total floor area of Building 2 would comprise approximately 379,369 square feet. Below the Table, Building 2 is anticipated to include a grocery market, restaurant uses and residential units. The upper levels of the building above the Table would be comprised of condominium units. Large outdoor amenity decks are proposed for the rooftop and on the fourth level. Building 2 would also incorporate 600 parking spaces.

Building 3: Mixed-Use Residential Apartments and Community-Serving Commercial Uses

Building 3 would comprise eight levels with a height of approximately 110.5 feet when excluding equipment penthouses. The building would include 532 residential apartments and approximately 62,966 square feet of community-serving commercial uses. Below the Table, Building 3 would include commercial uses that may include a market food hall, and restaurants, as well as apartments and up to 21 live/work units. Residential apartments would also be located within five levels above the Table. The total floor area of Building 3 would be approximately 493,671 square feet. An outdoor amenity terrace is proposed on the upper level. The fourth level would also include an outdoor resident pool and amenity decks. Building 3 would incorporate 900 parking spaces.

Building 4: Mixed-Use Residential Apartments, School and Community-Serving Commercial Uses

Building 4 would comprise eight levels with a height of approximately 110.5 feet when excluding equipment penthouses. The building would include 251 residential apartments that would include up to 17 live/work units, a 29,316 square foot school, and approximately 8,483 square feet of community-serving commercial uses. Below the Table, Building 4 would include a three-level school building with a school park, community-serving commercial uses, residential apartments and live/work units. Apartments would be located within the levels above the Table. Total proposed floor area for Building 4 would be approximately 254,368 square feet. An outdoor amenity deck is proposed on the upper level. In addition, the fourth level would include an outdoor resident pool and amenity decks. Building 4 would incorporate 330 parking spaces.

The school may be a private, charter or hybrid private/public school that would accommodate children from grades K-12. It is anticipated that the school would serve up to 300 students from the Project Site and general neighborhood.

Building 5: Office

Building 5 would comprise six full levels and a partial seventh level with a height of approximately 126 feet when excluding equipment penthouses. The building would provide approximately 253,514 square feet of office uses. The seventh level would also include an outdoor terrace deck for the office users. Building 5 would incorporate 440 parking spaces for the office uses.

Building 6: Residential Condominiums and Hotel Tower

Building 6, located at the corner of Alameda Street and 6th Street, would comprise 58 levels with a height of approximately 732 feet when excluding equipment penthouses. Building 6 would include 186 residential condominiums, 260 hotel guest rooms, and approximately 7,020 square feet of community-serving commercial uses. The total floor area would comprise approximately 606,293 square feet. The portion of the building below the Table would contain lobbies for the residential and hotel uses, and retail space. The levels above the Table would include hotel guest rooms, condominiums and amenity spaces for the hotel and condominiums. Approximately 369 parking spaces would be incorporated into Building 6.

Building 7: Residential Apartments and Retail Tower

Building 7, located at the southwest corner of the Project Site, would comprise 58 levels with a height of approximately 710 feet when excluding equipment penthouses. The building would include 522 residential apartments, and approximately 7,288 square feet of community-serving commercial uses. The total floor area would comprise approximately 654,342 square feet. The portion below the Table would contain a residential lobby, retail spaces, and amenity spaces. Residential apartments and amenities would be located in the levels above the Table. Approximately 642 parking spaces would be incorporated into Building 7.

c. Signage and Lighting

Project signage would be designed to be aesthetically compatible with the proposed architecture of the Project and other signage in the area. Proposed signage would include identity signage, including identity signage at 6th and Alameda Streets, commercial tenant signage, and general ground-level and pedestrian directional/wayfinding signage. In general, new signage would be architecturally integrated into the design of the building and would establish appropriate identification for the residential and commercial uses. No off-premise billboard advertising is proposed as part of the Project. Project signage would be illuminated by means of low-level external lighting, internal halo lighting, or ambient light. The Project would not include electronic signage or signs with flashing, mechanical, or strobe lights. In accordance with the LAMC, illumination used for Project signage would be limited to a light intensity of 3 foot-candles above ambient lighting, as measured at the property line of the nearest residentially zoned property.

Project lighting would include low-level exterior lighting on the buildings and along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage, architectural features, and landscaping elements would be incorporated

throughout the Project Site. Project lighting would also include interior lighting visible through the windows of the residential and commercial uses. Exterior lighting along the public areas would include pedestrian-scale fixtures and elements. All new street and pedestrian lighting within the public right-of-way would comply with applicable City regulations and would be approved by the Bureau of Street Lighting in order to maintain appropriate and safe lighting levels on both sidewalks and roadways while minimizing light and glare on adjacent properties. The proposed lighting sources would be similar to other lighting sources in the vicinity of the Project Site and would not generate artificial light levels that are out of character with the surrounding area, which is densely developed and characterized by a high degree of human activity during the day and night.

d. Access, Circulation, and Public Transportation

The Project's transportation strategy is defined by a multi-modal approach with neighborhood connectivity that includes multiple vehicular access points for adequate and convenient access and to facilitate dispersal of Project traffic, enhanced transit access and pedestrian access and connections to and from surrounding neighborhoods, and creation of a safe, internal pedestrian circulation plan with minimal vehicular conflicts.

6th Street is a gateway corridor to Downtown Los Angeles from the east and provides the primary front door access to the Project Site. Existing traffic lanes and capacity on 6th Street would be enhanced by widening the south side of 6th Street to create a new central turn lane and facilitate alternative transportation modes that would include a new eastbound dedicated bicycle lane as planned on the City's Bicycle Plan, a curb lane that would be utilized for bus stops, passenger loading and unloading, on-street parking, and a wide pedestrian sidewalk.

As shown in Figure A-11 on page A-20, two new north-south internal drives would be created on the Project Site to provide vehicular access and circulation. Central Drive, which would bisect the Project Site, would run from 6th Street to proposed Wholesale Street located on the south side of the Project Site and would include four lanes with a median and areas for parking and passenger drop-offs. A new traffic signal is proposed at 6th Street and Central Drive that would allow full traffic movements. West Drive, located between Alameda Street and Central Drive, would contain two lanes (one in each direction), with areas for parking and passenger drop-off and would provide parking access for Buildings 6 and 7. Proposed Wholesale Street would provide an east-west access spine across the southern end of the Project Site from Alameda Street to Mill Street. Vehicular entrances that would provide access to the subterranean parking structure for uses in Buildings 2, 3, 4, and 5 would be located along Wholesale Street. A new traffic signal would also be located at the intersection of Alameda and Wholesale Street to allow full traffic movements, and the intersection of Mill Street and Wholesale Street would be



Figure A-11
Site Circulation Plan

stop-controlled. A drop-off area for the boutique hotel proposed in Building 1 would be located along 6th Street near the intersection of Mill Street and vehicular access to subterranean parking for Building 1 would be provided along Mill Street.

Pedestrian access and circulation would be enhanced by the Project. A series of interlinking walkways and promenades would provide end-to-end pedestrian access through the Project Site and would include ground level plazas and squares for gathering, outdoor dining spaces, and bicycle parking racks. Two east-west walkways, referred to as the North and South Walkways, would provide ground-level pedestrian access that would connect from Mill Street to Alameda Street. A north-south pedestrian promenade (“East Promenade”) lined with trees and native grasses would connect from improved Wholesale Street to 6th Street. Wide and enhanced crosswalks are proposed at 6th Street and Mill Street, 6th Street and Central Drive, 6th Street and Alameda Street, and Alameda Street and Wholesale Street to provide pedestrian connections to and from surrounding neighborhoods. The internal circulation plan would include efficient bicycle circulation and access to bicycle parking locations within the Project.

The Project Site is served by a variety of nearby mass transit options, including a number of bus lines. Specifically, the Metro Rapid Bus Lines 720 and 760 and Metro Local Bus Lines 18, 53, 60, and 62 provide connections to Downtown subway stations, including Pershing Square and 7th Street/Metro Center. The Project Site is also located approximately 0.8 mile south of the Metro Gold Line and Regional Connector Little Tokyo/Arts District Station which is at the intersection of 1st Street and Alameda Street. Metro is currently studying the West Santa Ana Brand Light Rail Line, with one alignment option under Alameda Street with a potential station location at Alameda and 7th Street. Metro is also exploring extending the Red and Purple Rail Lines from Union Station along the west bank of the Los Angeles River to serve the growing Arts District, including potential stations in the vicinity of 2nd Street and 6th Street.

e. Open Space and Recreational Amenities

As shown in the composite plan for Levels 1, 4 and the roof included in Figure A-12 on page A-22, the Project would include a number of open space areas and recreational amenities spread within all seven of the proposed buildings and their surroundings. Open space and recreational amenities would include promenades, walkways that would provide connectivity throughout the Project Site, outdoor pool and amenity decks and terraces for the residential and hotel uses, a school park, numerous outdoor plazas and courtyards for use by the public, and private residential balconies.

Based on LAMC requirements, the Project’s residential component would be required to provide approximately 200,975 square feet of open space, of which a minimum



Figure A-12
Composite Landscape Plan of Level 1, Level 4, and Roof

of 50 percent shall be common open space for a minimum of 100,487 square feet (maximum 25 percent of provided common open space may be interior open space). The Project would exceed this amount with approximately 241,497 square feet of proposed open space of which approximately 176,170 square feet would be comprised of hardscape area with the remaining 65,327 square feet comprised of landscape area. The Project would provide an abundance of trees and other landscaping with approximately 379 new trees anticipated to be planted throughout the site. As discussed above, existing landscaping within the Project Site is limited and includes seven street trees. These trees would be replaced in coordination with the City of Los Angeles Urban Forestry Division. The new tree species would be drought-tolerant and/or of a climate-adapted nature and would primarily require moist to dry soil conditions.

f. Parking

Parking for the proposed uses would be provided in accordance with the requirements set forth in the Specific Plan. The Project would include 3,441 vehicle parking spaces in total distributed across its seven buildings. Parking would be provided within a range of subterranean and above grade levels that would be integrated with the new buildings. The subterranean parking levels would be located up to five levels below grade.

Approximately 2,187 bicycle parking spaces would be required for the Project including approximately 298 short-term and 1,889 long-term bicycle parking spaces. The Project would meet or exceed these requirements.

g. Sustainability Features

The Project would incorporate features to support and promote environmental sustainability. “Green” principles are incorporated throughout the Project to comply with the City of Los Angeles Green Building Code. These include, but are not limited to, energy-efficient buildings, a pedestrian- and bicycle-friendly site design, and water conservation and waste reduction features. The Project would also utilize sustainable planning and building strategies and incorporate the use of environmentally-friendly materials, such as non-toxic paints and recycled finish materials, whenever feasible. The mixed-use nature of the Project also provides the opportunity for people to live, work, and play and thus reduce vehicle miles traveled. In addition, the Project Site’s proximity to numerous bus lines and the Metro Gold Line and Regional Connector Little Tokyo/Arts District station would encourage and support the use of public transportation and a reduction in vehicle miles traveled by Project residents, employees, and visitors. The following specific features would be incorporated in the Project:

Energy Conservation and Efficiency

- Use of Energy Star–labeled products and appliances, including dishwashers in the residential units, where appropriate.
- Use of full-cutoff or fully shielded on-street lighting oriented to pedestrian areas/ sidewalks so as to minimize overlighting, light trespass, and glare.
- Use of light-emitting diode (LED) lighting or other energy-efficient lighting technologies, such as occupancy sensors or daylight harvesting and dimming controls, where appropriate, to reduce electricity use.
- Incorporation of energy-efficient design methods and technologies, such as centralized chiller plant with rooftop ventilation; high performance window glazing; undergrounding parking to reduce heat island effects; passive energy efficiency strategies, such as façade shading, roof overhangs, porches, and inner courtyards; high-efficiency domestic heaters; and enhanced insulation to minimize solar heat gain.
- Inclusion of outdoor air flow measuring devices, additional outdoor air ventilation, and use of low emitting materials to promote indoor environmental quality.
- Use of natural ventilation, when conditions permit, to reduce energy use and carbon emissions, while improving occupant health and productivity.
- Incorporation of generous operable windows and high-performance window glazing, shading of unit fenestration through balcony overhangs to prevent excess heat, and use of natural light.
- Use of insulated plumbing pipes and high-efficiency domestic water heaters.
- Use of updated boiler controls to improve efficiency.
- Use of refrigerants that reduce ozone depletion.
- Use of energy-efficient electrical and mechanical equipment and monitoring systems.
- Provision of conduit that is appropriate for future photovoltaic and solar thermal collectors.
- Post-construction commissioning of building energy systems performed on an ongoing basis to ensure all systems are running at optimal efficiency.

Water Conservation

- Inclusion of water conservation measures in accordance with Los Angeles Department of Water and Power requirements for new development in the City of Los Angeles (e.g., high-efficiency fixtures and appliances, weather-based irrigation systems, and drought-tolerant landscaping).
- Use of High Efficiency Toilets with flush volume 1.06 gallons of water per flush or less.
- Use of waterless urinals.
- Use of showerheads with flow rate of 1.5 gallons per minute or less.
- Use of water-saving pool filters.
- Use of drought-tolerant plants and indigenous species, storm water collection through a first flush filtration system of rain gardens where possible, permeable pavement wherever possible, and storm water filtration planters to collect roof water.
- Incorporation of a leak detection system for any swimming pool, Jacuzzi, or other comparable spa equipment introduced on-site.
- Use of high-efficiency Energy Star–rated dishwashers where appropriate.
- Prohibition of the use of single-pass cooling equipment (i.e., equipment in which water is circulated once through the system, then drains for disposal with no recirculation).
- Consideration of individual metering and billing for water use of all residential uses and exploration of metering for commercial spaces.
- Installation of cooling tower automatic water treatment to minimize cooling tower blowdown and water waste.
- Use of weather-based irrigation controllers with rain shutoff, matched precipitation (flow) rates for sprinkler heads, and rotating sprinkler nozzles or comparable technology, such as drip/microspray/subsurface irrigation where appropriate.
- Installation of a separate water meter (or submeter), flow sensor, and master valve shutoff for irrigated landscape areas totaling 5,000 square feet and greater.
- Use of proper hydro-zoning and turf minimization, as feasible.

- Installation of waste piping to allow for the future installation of a greywater system to supply landscape irrigation.

Water Quality

- Use of on-site storm water treatment.
- Installation of catch basin inserts and screens to provide runoff contaminant removal.
- Preparation and implementation of a Stormwater Pollution and Prevention Plan and Standard Urban Stormwater Mitigation Plan, both of which would include Best Management Practices to control stormwater runoff and minimize pollutant loading and erosion effects during and after construction.

Solid Waste

- Provision of on-site recycling containers to promote the recycling of paper, metal, glass, and other recyclable materials and adequate storage areas for such containers during construction and after the building is occupied.
- Use of building materials with a minimum of 10 percent recycled-content for the construction of the Project.
- Implementation of a construction waste management plan to recycle and/or salvage a minimum of 75 percent of nonhazardous construction debris or minimize the generation of construction waste to 2.5 pounds per square foot of building floor area.

Transportation

- Installation of bike share facilities at the Project Site, should a bike share program become available in Los Angeles.
- Allocation of preferred parking for alternative-fuel vehicles, low-emitting, and fuel-efficient and ride-sharing vehicles.
- Provision of electric vehicle charging stations in accordance with City requirements.

Air Quality

- Employment of practices that prohibit the use of chlorofluorocarbons (CFCs) in HVAC systems.

- Meeting applicable California and/or Los Angeles air emissions requirements for all heating or cogeneration equipment utilized at the Project Site.
- Installation of landscaping throughout the Project Site, including roof decks, pool decks, and terraces, to provide shading and capture carbon dioxide emissions.
- Use of adhesives, sealants, paints, finishes, carpet, and other materials that emit low quantities of volatile organic compounds (VOCs) and/or other air quality pollutants.

5. Project Construction and Scheduling

Construction of the Project would commence with demolition of the existing buildings and surface parking areas, followed by grading and excavation. Building foundations would then be laid, followed by building construction, paving/concrete installation, and landscape installation. The Project is anticipated to be completed within an extended horizon year of 2035. The estimated depth of excavation is anticipated to range to up to approximately 73 feet below grade when accounting for mat footings. It is estimated that approximately 920,000 cubic yards of export would be hauled from the Project Site during the demolition and excavation phase.

As part of the Project, a Construction Traffic Management Plan and Truck Haul Route Program would be implemented during construction to minimize potential conflicts between construction activity and through traffic. The Construction Traffic Management Plan and Truck Haul Route program would be subject to review and approval by the Los Angeles Department of Building and Safety (LADBS) and the Los Angeles Department of Transportation (LADOT). It is anticipated that the primary haul routes to and from the Project Site would include use of Alameda Street to either the I-10 Freeway to the south or the I-101 Freeway to the north.

6. Necessary Approvals

The City of Los Angeles has the principal responsibility for approving the Project. Approvals required for development of the Project may include, but are not limited to, the following:

- General Plan Amendment to: (a) change the land use designation for the Project Site from Heavy Manufacturing to Hybrid Industrial; and (b) amend the General Plan Land Use Map for the Central City North Community Plan area to include a footnote establishing the proposed Specific Plan as the land use regulatory document for the Project Site and provide for correspondence of the Hybrid Industrial land use designation with the Specific Plan zoning designation;

- Vesting Zone Change for the entire Project Site from M3-1-RIO to a Specific Plan zone and corresponding modification to the Los Angeles Municipal Code to add the Specific Plan zone;
- Proposed Specific Plan to regulate development within the Project Site;
- Development Agreement;
- Vesting Tentative Tract Map for the merger and resubdivision of the Project Site for airspace and condominium purposes;
- Approval of a Tree Removal Permit by the Board of Public Works.
- Certification of an Environmental Impact Report;
- Haul route approval, as may be required; and
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, and building permits.

B. Explanation of Checklist Determinations

Attachment B: Explanation of Checklist Determinations

The following discussion provides responses to each of the questions set forth in the City of Los Angeles Initial Study Checklist. The responses below indicate those issues that are expected to be addressed in an environmental impact report (EIR) and demonstrate why other issues would not result in potentially significant environmental impacts and thus do not need to be addressed further in an EIR. The questions with responses that indicate a “Potentially Significant Impact” do not presume that a significant environmental impact would result from the Project. Rather, such responses indicate those issues that will be addressed in an EIR with conclusions of impact reached as part of the analysis within the EIR.

I. Aesthetics

In September 2013, Governor Jerry Brown signed Senate Bill (SB) 743, which became effective on January 1, 2014. Among other provisions, SB 743 adds Public Resources Code (PRC) Section 21099, which provides that “aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.” PRC Section 21099 defines a “transit priority area” as an area within 0.5 mile of a major transit stop that is “existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.” PRC Section 21064.3 defines “major transit stop” as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.” PRC Section 21099 defines an infill site as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses. This state law supersedes the aesthetic impact thresholds in the 2006 L.A. CEQA Thresholds Guide, including those established for aesthetics, obstruction of views, shading, and nighttime illumination.

Would the project:

a. Have a substantial adverse effect on a scenic vista?

Less Than Significant Impact. A scenic vista is a view of a valued visual resource. Scenic vistas generally include public views that provide visual access to large panoramic views of natural features, unusual terrain, or unique urban or historic features. A scenic vista field of view can be wide, extend into the distance, and include focal views that focus on a particular object, scene, or feature of interest for the benefit of the general public. The Project Site is located within a highly urbanized area of the City of Los Angeles. Visual resources in the general vicinity of the Project Site include the Los Angeles River, the downtown Los Angeles skyline, and structures that are considered historic resources. As discussed in Attachment A, Project Description, of this Initial Study, the Project includes development of mid and high-rise buildings. These new buildings could potentially change the existing scenic vistas in the Project area. However, the Project is a mixed-use residential project that will be located on an infill site within a transit priority area. Accordingly, under Senate Bill (SB) 743, aesthetic impacts of the Project shall not be considered a significant impact on the environment. Nevertheless, for informational purposes only, the EIR will analyze the Project's potential effects on scenic vistas.

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No impact. The Project Site is not located along a state scenic highway. The nearest officially eligible state scenic highway is along the Foothill Freeway (I-210), approximately 8.5 miles northeast of the Project Site,¹ and the nearest City-designated scenic parkway is along Stadium Way between the I-5 and I-110 Freeways, approximately 2 miles north of the Project Site.²

Regardless, the Project Site does not include any scenic resources. Specifically, the Project Site is currently developed with a produce warehouse and distribution facility that is comprised of two single-story buildings totaling approximately 316,632 square feet. As discussed further below, the Project Site does not include protected trees. In addition, the Project Site does not include rock outcroppings, or other natural features. Therefore, the Project would not substantially damage scenic resources, including those located within a state or City-designated scenic highway. As such, the Project would not result in an impact

¹ *California Scenic Highway Mapping System, Los Angeles County, www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm, accessed December 2, 2016.*

² *Mobility Plan 2035, Map A4, Citywide General Plan Circulation System—Central, Midcity Subarea.*

to scenic resources within a scenic highway, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

c. Substantially degrade the existing visual character or quality of the site and its surroundings?

Less Than Significant Impact. As discussed in Attachment A, Project Description, of this Initial Study, the Project Site is located in a highly urbanized area characterized by a mixture of low- and mid-rise buildings occupied by a mix of uses. While the proposed buildings are anticipated to be compatible with the existing visual character and quality of the surrounding area, the Project would change the visual character of the Project Site and its surroundings with the introduction of new buildings that are up to 732 feet in height. While the Project could have the potential to degrade the existing visual character or quality of the Project Site and the surrounding area, the Project is a mixed-use residential project that will be located on an infill site within a transit priority area. Accordingly, under SB 743, aesthetic impacts of the Project shall not be considered a significant impact on the environment. Nevertheless, for informational purposes only, the EIR will analyze the Project's potential effects on visual character and quality.

d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less Than Significant Impact. The Project Site currently generates moderate levels of light and glare typical of an urban area. Light sources include low-level security lighting, vehicle headlights, and parking lot lighting. Glare sources include glass and metal vehicle and building surfaces. The Project would introduce new sources of light and glare that are typically associated with mixed-use developments, including low-level exterior lighting on the buildings and along pathways for security and wayfinding purposes. Furthermore, the Project would include new mid- and high-rise buildings, which would introduce an increased amount of nighttime lighting as compared to existing conditions. In addition, the new buildings would have the potential to shade sensitive land uses in the Project vicinity. However, the Project is a mixed-use residential project that will be located on an infill site within a transit priority area. Accordingly, under SB 743, aesthetic impacts of the Project shall not be considered a significant impact on the environment.³ Nevertheless, for informational purposes only, the EIR will analyze how the Project's light, glare and shading will affect the Project area.

³ *CEQA Guidelines Appendix G, which includes a comprehensive list of environmental topics under CEQA, does not expressly list shade and shadow impacts. The L.A. CEQA Thresholds Guide, however, considers shade and shadow impacts to be a type of aesthetic visual character impact under question 1c of Appendix G. The City has issued Zoning Information File (ZI) No. 2145, confirming that SB 743 applies to a project's aesthetic impacts, including shade and shadow impacts.*

II. Agriculture and Forest 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 and Range Assessment Project and the 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 (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?**

No Impact. The Project Site is located in an urbanized area of the City of Los Angeles. As discussed in Attachment A, Project Description, of this Initial Study, the Project Site is currently developed with two low-rise buildings and associated surface parking. In addition, no agricultural uses or operations occur on-site or in the vicinity of the Project Site. The Project Site and surrounding area are also not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency Department of Conservation.⁴ As such, the Project would not convert farmland to a non-agricultural use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

- b. **Conflict with existing zoning for agricultural use, or a Williamson Act contract?**

No Impact. The Project Site is zoned by the Los Angeles Municipal Code (LAMC) as M3-1-RIO (Heavy Manufacturing, River Improvement Overlay). The Project Site is not zoned for agricultural use. Furthermore, none of the surrounding properties are zoned for agricultural use. The Project Site and surrounding area are also not enrolled under a Williamson Act Contract.⁵ Therefore, the Project would not conflict with any zoning for

⁴ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report, <http://zimas.lacity.org/>, accessed December 2, 2016.

⁵ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report, <http://zimas.lacity.org/>, accessed December 2, 2016.

agricultural uses or a Williamson Act Contract. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

No Impact. As previously discussed, the Project Site is located in an urbanized area and is currently developed with two low-rise buildings and associated surface parking. The Project Site does not include any forest land or timberland. In addition, the Project Site is currently zoned for industrial uses and is not zoned and/or used as forest land.⁶ Therefore, the Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland as defined by the Public Resources Code. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

d. Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. As previously discussed, the Project Site is located in an urbanized area and does not include any forest land or timberland. Therefore, the Project would not result in the loss or conversion of forest land to non-forest use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

No Impact. The Project Site is located in an urbanized area of the City of Los Angeles and does not include farmland. The Project Site and surrounding area are not mapped as farmland, are not zoned for farmland or agricultural use, and do not contain any agricultural uses.⁷ As such, the Project would not result in the conversion of farmland to non-agricultural use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

⁶ City of Los Angeles Department of City Planning, *Zone Information and Map Access System (ZIMAS), Parcel Profile Report*, <http://zimas.lacity.org/>, accessed December 2, 2016.

⁷ City of Los Angeles Department of City Planning, *Zone Information and Map Access System (ZIMAS), Parcel Profile Report*, <http://zimas.lacity.org/>, accessed December 2, 2016.

III. Air Quality

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

a. Conflict with or obstruct implementation of the applicable air quality plan?

Potentially Significant Impact. The Project Site is located within the 6,700-square-mile South Coast Air Basin (the Basin). Within the Basin, the South Coast Air Quality Management District (SCAQMD) is required, pursuant to the federal Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in non-attainment (i.e., ozone, particulate matter less than 2.5 microns in size [PM_{2.5}], and lead⁸). The SCAQMD's 2012 Air Quality Management Plan (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.⁹ With regard to future growth, SCAG has prepared the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS), which provides population, housing, and employment projections for cities under its jurisdiction. The growth projections in the 2016–2040 RTP/SCS are based on growth projections in local general plans for jurisdictions in SCAG's planning area.

Construction and operation of the Project may result in an increase in stationary and mobile source air emissions. As a result, development of the Project could have a potential adverse effect on the SCAQMD's implementation of the AQMP. Therefore, the EIR will provide further analysis of the Project's consistency with the SCAQMD's AQMP.

With regard to the Project's consistency with the Congestion Management Program (CMP) administered by the Metropolitan Transportation Authority (Metro), see Response to Checklist Question XVI.b, Transportation/Circulation, below.

⁸ *Partial Nonattainment designation for the Los Angeles County portion of the Basin only.*

⁹ *SCAG serves as the federally designated metropolitan planning organization (MPO) for the Southern California region.*

b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Potentially Significant Impact. The Project would result in increased air pollutant emissions from the Project Site during construction (short-term) and operation (long-term). Construction-related pollutants would be associated with sources such as construction worker vehicle trips, the operation of construction equipment, site grading and preparation activities, and the application of architectural coatings. During Project operation, air pollutants would be emitted on a daily basis from motor vehicle travel, natural gas consumption, and other on-site activities. Therefore, the EIR will provide further analysis of the Project's construction and operational air pollutant emissions.

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

Potentially Significant Impact. As discussed above, construction and operation of the Project would result in the emission of air pollutants in the Basin, which is currently in non-attainment of federal air quality standards for ozone, PM_{2.5} and lead, and State air quality standards for ozone, particulate matter less than 10 microns in size (PM₁₀), and PM_{2.5}. Thus, implementation of the Project could potentially contribute to air quality impacts, which could cause a cumulative impact in the Basin. Therefore, the EIR will provide further analysis of cumulative air pollutant emissions associated with the Project.

d. Expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. As discussed above, the Project would result in increased air pollutant emissions from the Project Site during construction (short-term) and operation (long-term). Sensitive receptors located in the vicinity of the Project Site include residential uses to the west and northwest of the Project Site. Therefore, the EIR will provide further analysis of the Project's potential to result in substantial adverse impacts to sensitive receptors.

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

Less Than Significant Impact. No objectionable odors are anticipated as a result of either construction or operation of the Project. Specifically, construction of the Project would involve the use of conventional building materials typical of construction projects of similar type and size. Any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people.

With respect to Project operation, according to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project would not involve these types of uses. In addition, on-site trash receptacles would be contained, located, and maintained in a manner that promotes odor control, and would not result in substantially adverse odor impacts.

Construction and operation of the Project would also comply with SCAQMD Rule 402, which states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.¹⁰

Based on the above, potential odor impacts during construction and operation of the Project would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

IV. Biological Resources

Would the project:

- a. **Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?**

Less Than Significant Impact. The Project Site is located in an urbanized area and is currently developed with two low-rise warehouse and distribution buildings and associated surface parking. Landscaping is limited, with six street trees located along Alameda Street, and one street tree located along 6th Street. Due to the developed nature of the Project Site and the surrounding areas, and lack of large expanses of open space areas, species likely to occur on-site are limited to small terrestrial and avian species typically found in developed settings. Therefore, the Project would not 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

¹⁰ SCAQMD, *Rule 402, Nuisance*, www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf, accessed December 2, 2016.

regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

No Impact. The Project Site is located in an urbanized area and is currently developed with two low-rise warehouse and distribution buildings and associated surface parking. No riparian or other sensitive natural community exists on the Project Site or in the immediate surrounding area. Therefore, the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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?

No Impact. The Project Site is located in an urbanized area and is currently developed with two low-rise warehouse and distribution buildings and associated surface parking. No water bodies or federally protected wetlands as defined by Section 404 of the Clean Water Act exist on the Project Site or in the immediate vicinity of the Project Site. As such, the Project would not have an adverse effect on federally protected wetlands. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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?

Less Than Significant Impact. As described above, the Project Site is located in an urbanized area and is currently developed with two low-rise warehouse and distribution buildings and associated surface parking. In addition, the areas surrounding the Project Site are fully developed and there are no large expanses of open space areas within and surrounding the Project Site which provide linkages to natural open spaces areas and which may serve as wildlife corridors. Accordingly, development of the Project would not interfere substantially with any established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Furthermore, no water bodies that could

serve as habitat for fish exist on the Project Site or in the immediate vicinity of the Project Site. Notwithstanding, although unlikely, the existing ornamental street trees that would be removed during construction of the Project could potentially provide nesting sites for migratory birds. However, the Project would comply with the Migratory Bird Treaty Act, which regulates vegetation removal during the nesting season to ensure that significant impacts to migratory birds would not occur. In accordance with the Migratory Bird Treaty Act, tree removal activities would take place outside of the nesting season (February 15–September 15), if and to the extent feasible. To the extent that vegetation removal activities must occur during the nesting season, a biological monitor would be present during the removal activities to ensure that no active nests would be impacted. If active nests are found, a 300-foot buffer (500 feet for raptors) would be established until the fledglings have left the nest. With compliance with the Migratory Bird Treaty Act, the impact would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less Than Significant Impact. The City of Los Angeles Protected Tree Ordinance (Chapter IV, Article 6 of the LAMC) regulates the relocation or removal of all Southern California native oak trees (excluding scrub oak), California black walnut trees, Western sycamore trees, and California Bay trees of at least 4 inches in diameter at breast height. These tree species are defined as “protected” by the City of Los Angeles. Trees that have been planted as part of a tree planting program are exempt from this Ordinance and are not considered protected. The Ordinance prohibits, without a permit, the removal of any regulated protected tree, including “acts which inflict damage upon root systems or other parts of the tree...” and requires that all regulated protected trees that are removed be replaced on at least a 2:1 basis with trees that are of a protected variety.

Landscaping within the Project Site is limited, with six street trees located along Alameda Street, and one street tree located along 6th Street. None of these existing trees are protected tree species. The street trees would be replaced in coordination with the City of Los Angeles Urban Forestry Division and upon approval by the Board of Public Works. In addition, the Project would provide an abundance of trees and other landscaping with approximately 379 new trees anticipated to be planted throughout the site. Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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?

No Impact. The Project Site is located in an urbanized area and is currently developed with two warehouse and distribution buildings and associated surface parking. As previously described, landscaping within the Project Site is limited, with a total of seven ornamental street trees. The Project Site does not support any habitat or natural community. Accordingly, no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site. Thus, the Project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other related plans. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

V. Cultural Resources

Would the project:

a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

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

As discussed in Attachment A, Project Description, of this Initial Study, the Project Site is currently developed two low-rise warehouse and distribution buildings and associated surface parking. These buildings were constructed in approximately

1963 and thus meet the National Register's 50-year threshold for evaluating a potential historic resource.¹¹ Additionally, known historic resources, in the Project vicinity include the National Biscuit Company Building and the Seventh Street Bridge.¹², Therefore, the EIR will provide further analysis of the Project's potential to result in impacts to historic resources.

b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Potentially Significant Impact. Section 15064.5(a)(3)(D) of the CEQA Guidelines generally defines archaeological resources as any resource that “has yielded, or may be likely to yield, information important in prehistory or history.” Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community. The Project Site is located within a highly urbanized area and has been subject to grading and development in the past. Thus, surficial archaeological resources that may have existed at one time have likely been previously disturbed. Nevertheless, it is estimated that approximately 920,000 cubic yards of export material (e.g., concrete and asphalt surfaces) and soil would be hauled from the Project Site during the demolition and excavation phase. Thus, the Project could have the potential to disturb previously undiscovered archaeological resources. Therefore, the EIR will provide further analysis of the Project's potential impacts to archaeological resources.

c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Potentially Significant Impact. Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms, since the majority of species that have existed on earth from this era are extinct. Although the Project Site has been previously graded and developed, the Project would require grading and excavation to greater depths than those having previously occurred which would have the potential to disturb undiscovered paleontological resources that may exist within the Project Site. Therefore, the EIR will provide further analysis of the Project's potential impacts to paleontological resources.

¹¹ *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed December 2, 2016.*

¹² *Historic Places LA, www.historicplacesla.org, Accessed December 2, 2016.*

d. Disturb any human remains, including those interred outside of dedicated cemeteries (see Public Resources Code, Ch. 1.75, §5097.98, and Health and Safety Code §7050.5(b))?

Potentially Significant Impact. As discussed above, the Project Site is located within an urbanized area and has been subject to previous grading and development. No known traditional burial sites have been identified on the Project Site. Nevertheless, as the Project would require excavation at depths greater than those having previously occurred on the Project Site, the potential exists for the Project to uncover human remains. Therefore, the EIR will provide further analysis of this topic.

VI. Geology and Soils

Would the project:

- a. Expose 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.**

Potentially Significant Impact. Fault rupture occurs when movement on a fault deep within the earth breaks through to the surface. Based on criteria established by the California Geological Survey (CGS), faults can be classified as active, potentially active, or inactive. Active faults are those having historically produced earthquakes or shown evidence of movement within the past 11,000 years (during the Holocene Epoch). Potentially active faults have demonstrated displacement within the last 1.6 million years (during the Pleistocene Epoch) while not displacing Holocene Strata. Inactive faults do not exhibit displacement younger than 1.6 million years before the present. In addition, there are buried thrust faults, which are faults with no surface exposure. Due to their buried nature, the existence of buried thrust faults is usually not known until they produce an earthquake.

The CGS establishes regulatory zones around active faults, called Alquist-Priolo Earthquake Fault Zones (previously called Special Study Zones). These zones, which extend from 200 to 500 feet on each side of the known fault, identify areas where a potential surface fault rupture could prove hazardous for buildings used for human occupancy. Development projects located within an Alquist-Priolo Earthquake Fault Zone are required to prepare special geotechnical studies to characterize hazards from any potential surface ruptures. In addition, the City of Los Angeles designates Fault Rupture

Study Areas along the sides of active and potentially active faults to establish areas of potential hazard due to fault rupture.

The Project Site is not located within a City-designated Alquist-Priolo Special Study Zone or Fault Rupture Study Area.¹³ The closest active fault is the Puente Hills Blind Thrust Fault located approximately 1.15 miles from the Project Site.¹⁴ Nonetheless, as part of the EIR, a geotechnical report will be prepared to further address the potential for fault rupture impacts.

ii. Strong seismic ground shaking?

Potentially Significant Impact. The Project Site is located in the seismically active Southern California region and could be subjected to moderate to strong ground shaking in the event of an earthquake on one of the many active Southern California faults. The closest fault is the Puente Hills Blind Thrust Fault located approximately 1.15 miles from the Project Site. The Project would increase the amount of development on-site, thereby increasing the number of residents, employees, and visitors on-site. Therefore, additional people and structures would be exposed to potential adverse effects from ground shaking than under existing conditions. Although Project development must comply with the most current Los Angeles Building Code regulations, which specify structural requirements for different types of buildings in a seismically active area, further analysis of the potential for strong seismic ground shaking will be provided in the EIR.

iii. Seismic-related ground failure, including liquefaction?

Potentially Significant Impact. 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 shear strength due to excess water pressure that builds up during repeated seismic shaking. A shallow groundwater table, the presence of loose to medium dense sand and silty sand, and a long duration and high acceleration of seismic shaking are factors that contribute to the potential for liquefaction. Liquefaction usually results in horizontal and vertical movements from lateral spreading of liquefied materials.

¹³ *City of Los Angeles, Safety Element of the Los Angeles City General Plan, Exhibit A, November 26, 1996, p. 47.*

¹⁴ *City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report, <http://zimas.lacity.org/>, accessed December 2, 2016.*

The State of California does not classify the Project Site as part of a potentially liquefiable area.¹⁵ Additionally, the Project Site is not located in an area susceptible to liquefaction as mapped by the City of Los Angeles.¹⁶ Nonetheless, as part of the EIR, a geotechnical report will be prepared to confirm this finding and ensure that potential impacts associated with liquefaction would be less than significant.

iv. Landslides?

No Impact. Landslides generally occur in loosely consolidated, wet soil and/or rocks on steep sloping terrain. The Project Site and surrounding area are fully developed and generally characterized by flat topography. In addition, the Project Site is not located in a landslide area as mapped by the State,¹⁷ nor is the Project Site mapped as a landslide area by the City of Los Angeles.^{18,19} Therefore, the Project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. As such, no impacts associated with landslides would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. Development of the Project would require grading and excavation and other construction activities that have the potential to disturb existing soils and expose soils to rainfall and wind, thereby potentially resulting in soil erosion. Although Project development has the potential to result in the erosion of soils, this potential would be reduced by implementation of standard erosion controls imposed during site preparation and grading activities. Specifically, all grading activities would require grading permits from the City's Department of Building and Safety, which would include requirements and standards designed to limit potential impacts associated with erosion to acceptable levels. In addition, on-site grading and site preparation would comply with all applicable provisions of Chapter IX, Article 1 of the LAMC, which addresses grading, excavations, and fills. Regarding soil erosion during Project operations, the potential is

¹⁵ State of California, California Geological Survey, *Seismic Hazard Zones. Los Angeles Quadrangle, March 35, 1999.*

¹⁶ City of Los Angeles Department of City Planning, *Zone Information and Map Access System (ZIMAS), Parcel Profile Report, <http://zimas.lacity.org/>, accessed December 2, 2016.*

¹⁷ State of California, California Geological Survey, *Seismic Hazard Zones. Los Angeles Quadrangle, March 35, 1999.*

¹⁸ City of Los Angeles, *Safety Element of the Los Angeles City General Plan, Exhibit C, November 26, 1996, p. 51.*

¹⁹ City of Los Angeles Department of City Planning, *ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed December 2, 2016.*

relatively low since the Project Site would be fully developed and/or landscaped. Therefore, with compliance with applicable regulatory requirements, impacts regarding soil erosion or the loss of topsoil would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Potentially Significant Impact. As discussed above, the Project Site is susceptible to ground shaking. Thus, lateral spreading, subsidence, and collapse will be addressed in the EIR. In addition, as discussed in Checklist Question No. VI(a)(iii), potential liquefaction impacts will also be addressed in the EIR. As discussed above in Response to Checklist Question No. VI(a)(iv) impacts associated with landslides would not occur as part of the Project.

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?

Potentially Significant Impact. Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. The Project Site may contain soils that are considered to have a moderate expansion potential. Therefore, further analysis of this issue will be provided in the EIR.

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?

No Impact. The Project Site is located within a community served by existing sewage infrastructure. The Project's wastewater demand would be accommodated by connections to the existing wastewater infrastructure. As such, the Project would not require the use of septic tanks or alternative wastewater disposal systems. Therefore, the Project would have no impact related to the ability of soils to support septic tanks or alternative wastewater disposal systems. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

VII. Greenhouse Gas Emissions

Would the project:

- a. **Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**

Potentially Significant Impact. Gases that trap heat in the atmosphere are called greenhouse gases since they have effects that are analogous to the way in which a greenhouse retains heat. Greenhouse gases are emitted by both natural processes and human activities. The accumulation of greenhouse gases in the atmosphere affects the earth's temperature. The State of California has undertaken initiatives designed to address the effects of greenhouse gas emissions, and to establish targets and emission reduction strategies for greenhouse gas emissions in California. Activities associated with the Project, including construction and operational activities, would result in greenhouse gas emissions. Therefore, the EIR will provide further analysis of the Project's greenhouse gas emissions.

- b. **Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?**

Potentially Significant Impact. As the Project would have the potential to emit greenhouse gases, the EIR will include further evaluation of project-related emissions and associated emission reduction strategies to determine whether the Project conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases (e.g., Assembly Bill 32 [AB 32] and the City of Los Angeles Green Building Code).

VIII. Hazards and Hazardous Materials

Would the project:

- a. **Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**

Potentially Significant Impact. The types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used in the maintenance of commercial, institutional, and residential uses (e.g., cleaning solutions, solvents, pesticides for landscaping, painting supplies, and petroleum products). Construction of the Project would also involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids. However, all potentially hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable federal, State, and

local regulations. Nonetheless, as the potential for the transport, use, and/or disposal of hazardous materials exists, the EIR will include a more detailed analysis of this issue.

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?

Potentially Significant Impact. The existing buildings on-site were constructed in approximately 1963, prior to the enactment of laws preventing the use of asbestos-containing materials (ACM), polychlorinated biphenyls (PCBs) and lead based paint (LBP). Therefore, these materials may be present on the Project Site. A Phase I Environmental Site Assessment (ESA) will be prepared for the Project Site, which will evaluate whether the Project Site contains conditions that may result in a significant hazard to the public or the environment. In addition, the Project Site is located within a Methane Buffer Zone. Thus, further analysis of potential uses associated with release of hazardous materials will be provided in the EIR.

c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Potentially Significant Impact. Schools within a one-quarter mile radius of the Project Site include Metropolitan High School located at 727 Wilson Street. Therefore, further evaluation of this topic will be included in the EIR.

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?

Potentially Significant Impact. Section 65962.5 of the California Government Code requires the California Environmental Protection Agency (CalEPA) to develop and update annually the Cortese List, which is a “list” of hazardous waste sites and other contaminated sites. While Section 65962.5 makes reference to the preparation of a “list,” many changes have occurred related to web-based information access since 1992 and information regarding the Cortese List is now compiled on the websites of the Department of Toxic Substances Control (DTSC), the State Water Board, and CalEPA. The DTSC maintains the EnviroStor database, which includes sites on the Cortese List and also identifies potentially hazardous sites where cleanup actions or extensive investigations are planned or have occurred. The database provides a listing of federal Superfund sites, State response sites, voluntary cleanup sites, and school cleanup sites.

The Phase I ESA to be prepared for the Project will include a database search. Given the age of the buildings on-site, it is possible that the Project Site is listed on a hazardous materials site pursuant to Government Code Section 65962.5. Further analysis of this issue in an EIR is required

- 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?**

No Impact. The Project Site is not located within an area subject to an airport land use plan or within 2 miles of an airport. The closest airport is Los Angeles International Airport, located approximately 12 miles west of the Project Site. Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

- f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?**

No Impact. The Project Site is not located within the vicinity of a private airstrip. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

- g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

Potentially Significant Impact. According to the Safety Element of the City of Los Angeles General Plan, the nearest disaster routes to the Project Site are the I-10 and 1-101 Freeways.²⁰ Construction and operation of the Project would generate vehicular traffic that would utilize these freeways. As such, potential impacts associated with emergency response will be further evaluated in the EIR.

- 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?**

Less Than Significant Impact. There are no wildlands located in the vicinity of the Project Site. In addition, the Project Site is not located within a City-designated Very High

²⁰ *City of Los Angeles Department of Planning General Plan Safety Element—Critical Facilities and Lifeline Systems, Exhibit H, November 26, 1996.*

Fire Hazard Severity Zone.²¹ Furthermore, the Project would be developed in accordance with LAMC requirements pertaining to fire safety. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

IX. Hydrology and Water Quality

Would the project:

a. Violate any water quality standards or waste discharge requirements?

Potentially Significant Impact. Construction activities associated with the Project would have the potential to result in the conveyance of pollutants into municipal storm drains, particularly during precipitation events. In addition, potential changes in on-site drainage patterns resulting from Project operation and the introduction of new land uses could affect the quality and quantity of storm water runoff. While compliance with regulatory requirements would be expected to address potential water quality impacts, further analysis of this issue will be included in the EIR.

b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Potentially Significant Impact. It is anticipated that the Project would result in a similar amount of on-site impermeable areas compared to existing conditions due to the nature of the existing site as predominately impervious. Nevertheless, the potential exists for existing percolation of rainwater and irrigation water into the water table to be diminished, which could affect groundwater recharge. In addition, the proposed demolition of the existing uses and excavation activities required during construction would have the potential to encounter groundwater. Therefore, further analysis of this topic will be included in the EIR.

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

²¹ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed December 2, 2016. The Very High Fire Hazard Severity Zone was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone" shown on Exhibit D of the Los Angeles General Plan Safety Element.

manner which would result in substantial erosion or siltation on- or off-site?

Potentially Significant Impact. The Project Site is currently developed with warehouse and distribution uses and associated surface parking. No streams are located within the Project vicinity. The Project would involve the demolition of the existing uses, construction of new buildings, and the installation of new landscaped areas, which would have the potential to alter the existing drainage pattern of the Project Site. Therefore, further analysis of this issue will be included in the EIR.

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?

Potentially Significant Impact. See Response to Checklist Question IX.c, above.

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?

Potentially Significant Impact. See Response to Checklist Questions IX.a and IX.c, above.

f. Otherwise substantially degrade water quality?

Potentially Significant Impact. See Response to Checklist Question IX.a, above.

g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

No Impact. The Project Site is not located within a 100-year flood hazard area as mapped by the Federal Emergency Management Agency (FEMA) or by the City of Los Angeles.^{22,23} The Project Site is located in Zone X (Other Flood Areas), which are areas of 0.2 percent chance flood; areas of 1 percent annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by

²² Federal Emergency Management Agency, *Flood Insurance Rate Map, Panel Number 06037C1636F, effective September 26, 2008.*

²³ City of Los Angeles, *Safety Element of the Los Angeles City General Plan, Exhibit F, November 26, 1996, p. 57.*

levees from 1 percent annual chance flood. Thus, the Project would not place housing within a 100-year flood hazard area. No impacts would occur, and no mitigation would be required. No further analysis of this topic in an EIR is required.

h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

No Impact. As discussed above, the Project Site is not located within a designated 100-year flood plain area. Therefore, the Project would not place structures that would impede or redirect flood flows within a 100-year flood plain. No impacts would occur, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

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?

Less Than Significant Impact. As discussed above, the Project Site is not located within a designated 100-year flood plain. In addition, the Safety Element of the City of Los Angeles General Plan does not map the Project Site as being located within a flood control basin.²⁴ However, the Project Site is located within the potential dam inundation area for the Hansen Dam.²⁵ However, dams in California, are continually monitored by various governmental agencies (such as the State of California Division of Safety of Dams and the U.S. Army Corps of Engineers) to guard against the threat of dam failure. Current design and construction practices and ongoing programs of review, modification, or total reconstruction of existing dams are intended to ensure that all dams are capable of withstanding the maximum considered earthquake for the site. Pursuant to these regulations, dams in the City of Los Angeles are regularly inspected. In addition, the LADWP has emergency response plans to address any potential impacts to its dams. Given the oversight by the Division of Safety of Dams, including regular inspections, and the LADWP's emergency response program, the potential for substantial adverse impacts related to inundation at the Project Site as a result of dam failure would be less than significant. No further evaluation of this topic in the EIR is required.

²⁴ *City of Los Angeles, Safety Element of the Los Angeles City General Plan, Exhibit G, November 26, 1996, p. 59.*

²⁵ *City of Los Angeles, Safety Element of the Los Angeles City General Plan, Exhibit G, November 26, 1996, p. 59.*

j. Inundation by seiche, tsunami, or mudflow?

Less Than Significant Impact. A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant undersea disturbance such as tectonic displacement associated with large, shallow earthquakes. Mudflows result from the downslope movement of soil and/or rock under the influence of gravity.

The Project Site is located approximately 14 miles east of the Pacific Ocean. In addition, the Safety Element of the General Plan does not map the Project Site as being located within an area potentially affected by a tsunami.²⁶ The closest body of water to the Project Site is the Los Angeles River located approximately 0.35 mile to the east. However, the Los Angeles River is channelized and based on its location would not result in seiche or mudflow impacts to the Project Site. In addition, there are no other bodies of water in the Project vicinity that could result in seiche or mudflow impacts to the Project Site. Therefore, impacts associated with inundation by seiche, tsunami or mudflow would be less than significant, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

X. Land Use and Planning

Would the project:

a. Physically divide an established community?

Less Than Significant Impact. The Project Site is located in a highly urbanized area. The Project vicinity is developed with a mix of light industrial, commercial and residential uses. To the north, across 6th street are a variety of light industrial and commercial uses that include restaurants and live-work spaces. To the south across Wholesale Street are light industrial uses that include cold storage, brewery and warehouse and distribution facility uses. East of the Project Site across Mill Street is a six-story building currently used by a mix of uses, including ETO Doors, as well as other distribution, warehouse, and creative loft uses. To the west across Alameda Street is a Metro facility that includes maintenance and storage of buses.

Against this background, the Project would not divide an established community. Specifically, there is no existing residential use on the Project Site or a residential area that

²⁶ City of Los Angeles, *Safety Element of the Los Angeles City General Plan, Exhibit G, November 26, 1996, p. 59.*

would be physically separated or otherwise disrupted by the Project as development of the Project would occur within the boundaries of the existing Project Site. Moreover, the proposed uses would be compatible with the variety of existing land uses in the surrounding area. Therefore, impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Potentially Significant Impact. As discussed in Attachment A, Project Description, of this Initial Study, the Project requires discretionary approvals, including, but not limited to, a General Plan Amendment, a Vesting Zone Change, a Specific Plan, and a Development Agreement. Therefore, the EIR will provide further analysis of the Project's consistency with the General Plan, the LAMC, the Community Plan, and other applicable land use plans, policies, and regulations.

c. Conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. As discussed above, in Response to Checklist Question IV.f, the Project Site is located in an urbanized area and is currently developed with two warehouse and distribution buildings and associated surface parking. Landscaping is limited, with seven ornamental street trees. The Project Site does not support any habitat or natural community. Accordingly, no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site. Thus, the Project would not conflict with the provisions of an adopted habitat conservation plan or natural community conservation plan. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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?**

Less Than Significant Impact. The Project Site is mapped as being located within a Mineral Resource Zone 2 Area of the City.²⁷ A Mineral Resource Zone 2 is an area of the City where information indicates that mineral deposits are present or where it is judged that a high likelihood for their presences exists. However, the Project Site is not mapped as an existing mineral resource area by the State of California.²⁸ In addition, no mineral extraction operations currently occur on the Project Site, nor are such activities proposed. Furthermore, the Project Site is located within an urbanized area and has been previously disturbed by development. The Project Site is also not located within a City-designated oil field or oil drilling area.²⁹ Therefore, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

- 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?**

Less Than Significant Impact. See Response to Checklist Question XI.a, above.

²⁷ *City of Los Angeles General Plan Framework EIR*, http://cityplanning.lacity.org/HousingInitiatives/HousingElement/FrameworkEIR/GPF_DraftEIR/GPF_FEIR_DEIR2.17_p1-35.pdf, accessed December 2, 2016.

²⁸ *California Geological Survey, Aggregate Demand Map*, www.conservation.ca.gov/cgs/information/publications/ms/Documents/MS_52_2012.pd, accessed December 2, 2016.

²⁹ *City of Los Angeles, Safety Element of the Los Angeles City General Plan, Exhibit E*, November 26, 1996, p. 55.

XII. Noise

Would the project result in:

- a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

Potentially Significant Impact. The Project Site is located within an urbanized area that contains various sources of noise. The most predominate source of noise in the vicinity of the Project Site is associated with traffic from roadways. Existing on-site noise sources primarily include vehicle noises associated with loading and on-site circulation, stationary mechanical equipment, and human activity on the Project Site. During construction activities associated with the Project, the use of heavy equipment (e.g., bulldozers, backhoes, cranes, loaders, etc.) would generate noise on a short-term basis. In addition, because the Project would introduce new permanent residential, institutional and commercial uses to the Project Site, noise levels from on-site sources may also increase during operation of the Project. Furthermore, traffic attributable to the Project has the potential to increase noise levels along adjacent roadways. Therefore, further evaluation of this topic will be provided in the EIR.

- b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?**

Potentially Significant Impact. Construction of the Project could generate groundborne noise and vibration associated with demolition, site grading, other clearing activities, the installation of building footings, and construction truck travel. As such, the Project would have the potential to generate and expose people to excessive groundborne vibration and noise levels during short-term construction activities. Therefore, further evaluation of this topic will be provided in the EIR.

- c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?**

Potentially Significant Impact. Traffic and human activity associated with the Project, as described above, have the potential to increase ambient noise levels above existing levels. Therefore, further evaluation of this topic will be provided in the EIR.

- d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?**

Potentially Significant Impact. As discussed above in Response to Checklist Questions XII.a and XII.b, construction activities associated with the Project would have the

potential to temporarily or periodically increase ambient noise levels above existing levels. Therefore, further evaluation of this topic will be provided in the EIR.

- e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?**

No Impact. The Project Site is not located within an airport land use plan or within 2 miles of an airport. The closest airport to the Project Site is Los Angeles International Airport located approximately 12 miles west of the Project Site. Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

- f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?**

No Impact. The Project Site is not located within the vicinity of a private airstrip. Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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)?**

Potentially Significant Impact. The Project would result in the construction of 1,736 new residential dwelling units. In addition, the Project would introduce new commercial and institutional uses to the Project Site. As such, the Project would introduce residential and daytime population growth in the area. Therefore, further analysis of this topic in an EIR is required.

- b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?**

No Impact. As no housing currently exists on the Project Site, the Project would not displace any existing housing. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No Impact. As no housing currently exists on the Project Site, the development of the Project would not cause the displacement of any persons or require the construction of housing elsewhere. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

XIV. Public Services

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

a. Fire protection?

Potentially Significant Impact. The LAFD provides fire protection and emergency medical services for the Project Site. The closest LAFD fire station to the Project Site is Fire Station No. 9 located at 430 East 7th Street, approximately 0.6 mile west of the Project Site. The Project would increase the building square footage on-site and introduce new residents, employees, students and visitors to the Project Site. Therefore, further analysis of this issue will be included in the EIR.

b. Police protection?

Potentially Significant Impact. Police protection for the Project Site is provided by the City of Los Angeles Police Department. The Project Site is served by the Central Community Police Station located at 251 E. 6th Street, approximately 0.65 mile northwest of the Project Site. The Project would introduce new residential, commercial, and institutional uses to the site and increase the residential and daytime population in the service area. This could result in the need for additional police services and associated facilities. Therefore, the EIR will provide further analysis of this issue.

c. Schools?

Potentially Significant Impact. The Project Site is located within the boundaries of the LAUSD. The LAUSD is divided into six local districts.³⁰ The Project Site is located in

³⁰ Los Angeles Unified School District, Board of Education Districts Maps 2015–2016, <http://achieve.lausd.net/Page/8652>, accessed December 2, 2016.

Local District 2. The Project would include of the development of residential and commercial uses, which would generate a demand for educational services and school facilities. As part of the Project, a neighborhood school is also proposed. The EIR will provide further analysis of this issue.

d. Parks?

Potentially Significant Impact. The development of residential uses as part of the Project would generate a new population at the Project Site that could utilize nearby parks and/or recreational facilities. Thus, the EIR will provide further analysis of this issue.

e. Other public facilities?

Potentially Significant Impact. The development of residential uses as part of the Project would generate a new population that would generate a demand for library services provided by the Los Angeles Public Library. Therefore, the EIR will provide further analysis of this issue.

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?**

Potentially Significant Impact. See Response to Checklist Question XIV.d, above.

- 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?**

Potentially Significant Impact. The Project would include the development of recreational facilities. In addition, the Project would introduce a new residential population to the Project Site that could utilize nearby recreational facilities. Therefore, the EIR will provide further analysis of this topic.

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?

Potentially Significant Impact. The Project proposes development that would result in an increase in daily and peak-hour traffic within the vicinity of the Project Site. In addition, construction of the Project has the potential to affect the transportation system through the hauling of excavated materials and debris, the transport of construction equipment, the delivery of construction materials, and travel by construction workers to and from the Project Site. Once construction is completed, the Project's residents, employees, and visitors would generate vehicle and transit trips throughout the day. The resulting increase in the use of the area's transportation facilities could exceed roadway and transit system capacities. Therefore, further analysis of this issue will be provided in the EIR.

b. Conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Potentially Significant Impact. Metro administers the Congestion Management Program, a State-mandated program designed to address the impacts urban congestion has on local communities and the region as a whole. The CMP provides an analytical basis for the transportation decisions contained in the State Transportation Improvement Project. The CMP for Los Angeles County requires an analysis of any Project that could add 50 or more trips to any CMP intersection or more than 150 trips to a CMP mainline freeway location in either direction during either the A.M. or P.M. weekday peak hours. Implementation of the Project has the potential to generate additional vehicle trips, which could potentially add more than 50 trips to a CMP roadway intersection or more than 150 trips to a CMP freeway segment. Therefore, further analysis of this issue will be provided in the EIR.

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?

Less Than Significant Impact. The Project Site is not located within the vicinity of any private or public airport or planning boundary of any airport land use plan. Additionally, the Project does not propose any uses that would increase the frequency of air traffic. The Project would have a maximum height of approximately 732 feet. As such, the Project would be required to comply with applicable Federal Aviation Administration (FAA) requirements regarding rooftop lighting for high-rise structures. In addition, the Project would be required to comply with the notice requirements imposed by the FAA for all new buildings taller than 200 feet, and would complete Form 7460-1 (Notice of Proposed

Construction or Alteration). With compliance with these regulations, and given the distance between the Project Site and the nearest airport, impacts to air traffic patterns would be less than significant. Therefore, no mitigation measures are required. No further evaluation of this topic in an EIR is required

d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

No Impact. The Project's design does not include hazardous features. The roadways adjacent to the Project Site are part of the urban roadway network and contain no sharp curves or dangerous intersections. In addition, the development of the Project would not result in roadway improvements such that safety hazards would be introduced adjacent to the Project Site. Furthermore, the design and implementation of new driveways would comply with the City's applicable requirements, including emergency access requirements set forth by the LAFD. The Project design would also be reviewed by the Los Angeles Department of Building and Safety and the LAFD during the City's plan review process to ensure all applicable requirements are met. Moreover, the proposed uses would be consistent with the surrounding uses. Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

e. Result in inadequate emergency access?

Potentially Significant Impact. While it is expected that construction activities for the Project would primarily occur within the Project Site, construction activities could potentially require the partial closure of travel lanes on adjacent streets for the installation or upgrading of local infrastructure. Construction within these roadways has the potential to impede access to adjoining uses, as well as reduce the rate of flow of the affected roadway. The Project would also generate construction traffic, particularly haul trucks, which may affect the capacity of adjacent streets and highways. Therefore, further analysis of this issue in an EIR is required.

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?

Potentially Significant Impact. The Project Site is served by a variety of transit options. The development of the Project would increase demand for alternative transportation modes in the vicinity of the Project Site. Therefore, further analysis of the potential for the Project to conflict with adopted policies, plans, or programs regarding public transit, bicycle facilities, or pedestrian facilities will be provided in the EIR.

XVII. Tribal Cultural Resources

Would the project:

- a. **Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:**
 - i. **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), or**
 - ii. **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.**

Potentially Significant Impact. Approved by Governor Jerry Brown on September 25, 2014, 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 Section 21074, as part of CEQA. Effective July 1, 2015, AB 52 applies to projects that file a Notice of Preparation or Notice of Negative Declaration/Mitigated Negative Declaration on or after July 1, 2015. 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 tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation.

As noted above, the Project would require excavations to previously undisturbed depths. Therefore, the potential exists for the Project to significantly impact a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe. In compliance with AB 52, the City will notify all applicable tribes and the Project will participate in any requested consultations. Further analysis of this topic will be provided in the EIR.

XVIII. Utilities

Would the project:

a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Potentially Significant Impact. The City of Los Angeles Department of Public Works provides wastewater collection and treatment services for the Project Site. As is the case under existing conditions, wastewater generated during operation of the Project would be collected and discharged into existing sewer mains and conveyed to the Hyperion Treatment Plant (HTP) in El Segundo. The Project would result in increased wastewater generation from the Project Site. Therefore, further analysis of this topic in the EIR is required.

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?

Potentially Significant Impact. The Project would result in increased wastewater generation and increased water demand. As such, the Project would result in increased use of water and wastewater infrastructure and facilities, possibly necessitating the construction of new facilities. Therefore, further analysis of this topic in an EIR will be provided.

c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Potentially Significant Impact. See Response to Checklist Question IX.c, above. As discussed therein, the Project would involve the demolition of the existing uses, construction of new buildings, and the installation of new landscaped areas, which would have the potential to alter the existing drainage pattern of the Project Site and affect the amount of stormwater runoff. Therefore, further analysis of this issue will be included in the EIR.

d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Potentially Significant Impact. LADWP supplies water to the Project Site. The Project would increase the demand for water provided by LADWP. Therefore, further

analysis of this issue in an EIR will be provided. As part of this analysis, a Water Supply Assessment (WSA) will be prepared for the Project.

- 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?**

Potentially Significant Impact. See Response to Checklist Question XVIII.b, above.

- f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?**

Potentially Significant Impact. Various public agencies and private companies provide solid waste management services in the City. Construction wastes would be generated by the demolition of existing on-site uses, the export of soil material, as well as from the byproducts of new construction. Upon build-out, the Project would increase the amount of development on-site, which would result in an increase in the amount of waste to be disposed of at landfills that serve the City. Construction and operation could result in solid waste disposal needs in excess of landfill capacity. Therefore, further analysis of this topic in an EIR is required.

- g. Comply with federal, state, and local statutes and regulations related to solid waste?**

Potentially Significant Impact. As discussed above under Response to Checklist Question XVIII.f, Utilities, the Project would increase the amount of development on-site, which would result in an increase in the amount of solid waste generated as compared to existing conditions. Therefore, further analysis of this topic in an EIR is required.

- h. Other utilities and service systems?**

Potentially Significant Impact. The Project would generate an increased demand for electricity and natural gas services provided by LADWP and the Southern California Gas Company, respectively. Therefore, further analysis of this issue will be provided in the EIR. In addition, while development of the Project would not be anticipated to cause the wasteful, inefficient, and unnecessary consumption of energy and would be consistent with the intent of Appendix F of the CEQA Guidelines, further analysis of the Project's consistency with Appendix F will also be provided in the EIR.

XIX. Mandatory Findings of Significance

- a. **Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?**

Potentially Significant Impact. As discussed above, the Project is located in a highly urbanized area and does not serve as habitat for fish or wildlife species. No sensitive plant or animal community or special status species occur on the Project Site. However, as indicated above, the Project does have the potential to result in impacts to cultural resources. Therefore, further evaluation of this topic in an EIR is required.

- b. **Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).**

Potentially Significant Impact. The potential for cumulative impacts occurs when the impacts of the Project are combined with impacts from related development projects and result in impacts that are greater than the impacts of the Project alone. Located within the vicinity of the Project Site are other current and reasonably foreseeable projects, the development of which, 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 the EIR for the following subject areas: air quality; cultural resources; geology and soils; greenhouse gas emissions; hazards and hazardous materials; hydrology and water quality; land use and planning; population and housing noise; public services (fire protection, police protection, schools, parks, and other public services); transportation/circulation; tribal cultural resources; and utilities (water, wastewater, solid water and energy).

With regard to cumulative effects with respect to agricultural resources, biological resources, and mineral resources, the Project's incremental contribution to potential cumulative impacts would not be cumulatively considerable. Specifically, with respect to agricultural resources and mineral resources, the Project would have no impact on these resources, and therefore could not combine with other projects to result in cumulative impacts. Therefore, cumulative impacts with respect to these topics would be less than significant, and no mitigation measures are required. No further evaluation of these topics in an EIR is required.

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

Potentially Significant Impact. Based on the analysis contained in this Initial Study, the Project could result in potentially significant impacts with regard to the following topics: air quality; cultural resources; geology and soils; greenhouse gas emissions; hazards and hazardous materials; hydrology and water quality; land use and planning; noise; population and housing; public services (fire protection, police protection, schools, parks, and other public services); transportation/circulation; tribal cultural resources; and utilities (water, wastewater, solid waste and energy). As a result, these potential effects will be analyzed further in the EIR.