LOS ANGELES
DEPARTMENT OF CITY
PLANNING
221 North Figueroa St., Suite 1350
Los Angeles, CA 90012

INITIAL STUDY

1811 Sacramento Project

Case Number: ENV-2022-7197-MND

Project Location: 1727—1829 East Sacramento Street, Los Angeles, California, 90021

Community Plan Area: Central City North Community Plan Area

Council District: 14—de León

Project Description: The 1811 Sacramento Street Project includes the development of a commercial office building on a 74,277-square-foot (1.71-acre) site located at 1727–1829 East Sacramento Street (Project Site) in the Central City North Community Plan area in the City of Los Angeles (City). The Project would include approximately 277,700 square feet of office space inclusive of approximately 232,500 square feet of interior office space and approximately 45,200 square feet of exterior covered office space. The Project also includes, approximately 8,000 square feet of restaurant space, and approximately 5,200 square feet of retail space, resulting in a total floor area of approximately 290,900 square feet and a floor area ratio (FAR) of approximately 3.92:1 upon completion of the Project. Additionally, the Project would include approximately 41,500 square feet of uncovered outdoor areas throughout the Project Site that include exterior office space, outdoor dining space, a rooftop deck and an outdoor amenity deck. The proposed uses would be located within a 15-story building (maximum height of 232 feet). A total of 582 parking spaces would be provided within an above-ground and visually concealed parking garage that would be integrated into levels one through six of the building. The three existing warehouse structures totaling approximately 40,479 square feet of floor area would be removed as part of the Project.

PREPARED FOR:
The City of Los Angeles
Department of City Planning

PREPARED BY:
Eyestone Environmental, LLC

APPLICANT:
SCD 1811 Sacramento LLC

November 2023

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1 INTRODUCTION

An application for the proposed 1811 Sacramento Project (Project) has been submitted to the City of Los Angeles Department of City Planning for discretionary review. The City of Los Angeles, as Lead Agency, has determined that the project is subject to the California Environmental Quality Act (CEQA), and that the preparation of an Initial Study is required.

This Initial Study (IS) evaluates the potential environmental effects that could result from the construction, implementation, and operation of the proposed Project. This Initial Study has been prepared in accordance with CEQA (Public Resources Code Section 21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations Section 15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006). The City uses Appendix G of the State CEQA Guidelines as the thresholds of significance unless another threshold of significance is expressly identified in the document. This Initial Study is intended as an informational document, which is ultimately required to be considered and certified by the decision-making body of the City prior to approval of the Project.

1.1 PURPOSE OF AN INITIAL STUDY

The California Environmental Quality Act was enacted in 1970 with several basic purposes, including: (1) to inform governmental decision makers and the public about the potential significant environmental effects of proposed projects; (2) to identify ways that environmental damage can be avoided or significantly reduced; (3) to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternatives or mitigation measures; and (4) to disclose to the public the reasons behind a project's approval even if significant environmental effects are anticipated.

An Initial Study is a preliminary analysis conducted by the Lead Agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the Initial Study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, the Lead Agency shall prepare a Negative Declaration. If the Initial Study identifies potentially significant effects but revisions have been made by or agreed to by the applicant that would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, a Mitigated Negative Declaration is appropriate. If the Initial Study concludes that neither a Negative Declaration nor Mitigated Negative Declaration is appropriate, an EIR is normally required.[1]

1.2 ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into sections as follows:

[1] State CEQA Guidelines Section 15063(b)(1) identifies the following three options for the Lead Agency when there is substantial evidence that the project may cause a significant effect on the environment: "(A) Prepare an EIR, or (B) Use a previously prepared EIR which the Lead Agency determines would adequately analyze the project at hand, or (C) Determine, pursuant to a program EIR, tiering, or another appropriate process, which of a project's effects were adequately examined by an earlier EIR or negative declaration.

1 INTRODUCTION

Describes the purpose and content of the Initial Study and provides an overview of the CEQA process.

2 EXECUTIVE SUMMARY

Provides Project information, identifies key areas of environmental concern, and includes a determination whether the project may have a significant effect on the environment.

3 PROJECT DESCRIPTION

Provides a description of the environmental setting and the Project, including project characteristics and a list of discretionary actions.

4 EVALUATION OF ENVIRONMENTAL IMPACTS

Contains the completed Initial Study Checklist and discussion of the environmental factors that would be potentially affected by the Project. This Section also includes mitigation measures that will be implemented to reduce impacts to less than significant levels. In accordance with Public Resources Code Section 21064.5 and CEQA Guidelines Sections 15064(f)(2) and 15070(b), the mitigation measures contained in Section 4, below have been agreed to by the Applicant.

1.3 CEQA PROCESS

In compliance with the State CEQA Guidelines, the City, as the Lead Agency for the Project, will provide opportunities for the public to participate in the environmental review process. As described below, an effort will be made to inform, contact, and solicit input on the Project from various government agencies and the general public, including stakeholders and other interested parties.

At the onset of the environmental review process, the City has prepared this Initial Study to determine if the Project may have a significant effect on the environment. This Initial Study determined that with implementation of mitigation, agreed to by the Applicant, the Project would not have a significant effect(s) on the environment and a MND will be appropriate for the Project. As set forth in Section 15072 of the CEQA Guidelines, the City, as the Lead Agency for the Project, will provide a notice of intent to adopt an MND to the public, responsible agencies, trustee agencies, and the county clerk to allow the public and agencies to review the proposed MND. Pursuant to Section 15105 of the CEQA Guidelines, the public review period for a proposed Negative Declaration or MND shall be not less than 20 days (or 30 days when a proposed Negative Declaration or MND is submitted to the State Clearinghouse for review by state agencies.

2 EXECUTIVE SUMMARY

PROJECT TITLE	**1811 Sacramento Street**
ENVIRONMENTAL CASE NO.	ENV-2022-7197-MND
RELATED CASES	CPC-2022-7196-GPA-VZC-HD-MCUP-SPR

PROJECT LOCATION	1727–1829 East Sacramento Street, Los Angeles, California, 90021
COMMUNITY PLAN AREA	Central City North Community Plan Area
GENERAL PLAN DESIGNATION	Heavy Manufacturing
ZONING	M3-1-RIO
COUNCIL DISTRICT	14 – De Leon

LEAD AGENCY	**City of Los Angeles**
CITY DEPARTMENT	Department of City Planning
STAFF CONTACT	**SOPHIA KIM**
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ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by the Project. The impacts for each of these environmental factors would be less than significant with implementation of the mitigation measures included in this MND.

☐ Aesthetics	☐ Greenhouse Gas Emissions	☐ Public Services
☐ Agriculture & Forestry Resources	☒ Hazards & Hazardous Materials	☐ Recreation
☐ Air Quality	☐ Hydrology/Water Quality	☐ Transportation
☐ Biological Resources	☐ Land Use/Planning	☒ Tribal Cultural Resources
☒ Cultural Resources	☐ Mineral Resources	☐ Utilities/Service Systems
☐ Energy	☐ Noise	☐ Wildfire
☒ Geology/Soils	☐ Population/Housing	☐ Mandatory Findings of Significance

DETERMINATION

(To be completed by the 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.

Sophia Kim, City Planner	November 17, 2023
PRINTED NAME, TITLE	**DATE**

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 that significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as described in (5) below, may be cross referenced).

5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:

   a) Earlier Analysis Used. Identify and state where they are available for review.

   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

   c) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.

9) The explanation of each issue should identify:

   a) The significance criteria or threshold, if any, used to evaluate each question; and

   b) The mitigation measure identified, if any, to reduce the impact to less than significance.

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The 1811 Sacramento Street Project (Project) includes the development of a commercial office building on a 74,277-square-foot (1.71-acre) site located at 1727–1829 East Sacramento Street ("Project Site") in the Central City North Community Plan area in the City of Los Angeles ("City"). The Project would include approximately 277,700 square feet of office space inclusive of approximately 232,500 square feet of interior office space and approximately 45,200 square feet of exterior covered office space. The Project also includes, approximately 8,000 square feet of restaurant space, and approximately 5,200 square feet of retail space, resulting in a total floor area of approximately 290,900 square feet and a floor area ratio (FAR) of approximately 3.92:1 upon completion of the Project. Additionally, the Project would include approximately 41,500 square feet of uncovered outdoor areas throughout the Project Site that include exterior office space, outdoor dining space, a rooftop deck and an outdoor amenity deck.[2] The proposed uses would be located within a 15-story building (maximum height of 232 feet). The proposed net zero carbon office building has been designed to redefine the workplace by maximizing the use of indoor and outdoor spaces and further creating a convertible design of the parking garage to be adaptable for potential future office uses. A total of 582 parking spaces would be provided within an above-ground and visually concealed parking garage that would be integrated into levels one through six of the building. The three existing warehouse structures totaling approximately 40,479 square feet of floor area would be removed as part of the Project. Regarding the anticipated haul route for the Project, construction delivery/haul trucks would travel on approved truck routes between the Project Site and the Santa Monica Freeway (I-10). Incoming trucks would travel from the I-10, exit onto 8th Street, heading west, turn right onto Mateo Street, turn left onto Sacramento Street to the Project Site. Departing trucks would exit the Project Site onto Sacramento Street, heading east, turn right onto Mateo Street, heading south, turn left onto Porter Street, heading east, and onto the I-10 Freeway. Construction would require approximately 11,800 cubic yards of total soil export and no soil import.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

The Project Site is located at 1727–1829 East Sacramento Street, in the Central City North Community Plan Area of the City and within the Arts District. The Project Site is located approximately 0.4 mile west of the Los Angeles River and approximately 13 miles east of the Pacific Ocean. As shown in Figure 1 and Figure 2 on pages 7 and 8, the Project Site is an irregular-shaped corner site generally bounded by adjacent developed properties to the north and southwest, Sacramento Street to the south, and Wilson Street to the east.

Regional access to the Project Site is provided by the Santa Monica Freeway (I-10) approximately 0.2 mile to the south, the Hollywood Freeway (US-101) approximately 0.8 mile to the east, and the Golden State Freeway (I-5) approximately 0.8 mile to the east. Local access to the Project Site is provided by

[2] Uncovered outdoor areas do not contribute to the Project's FAR.

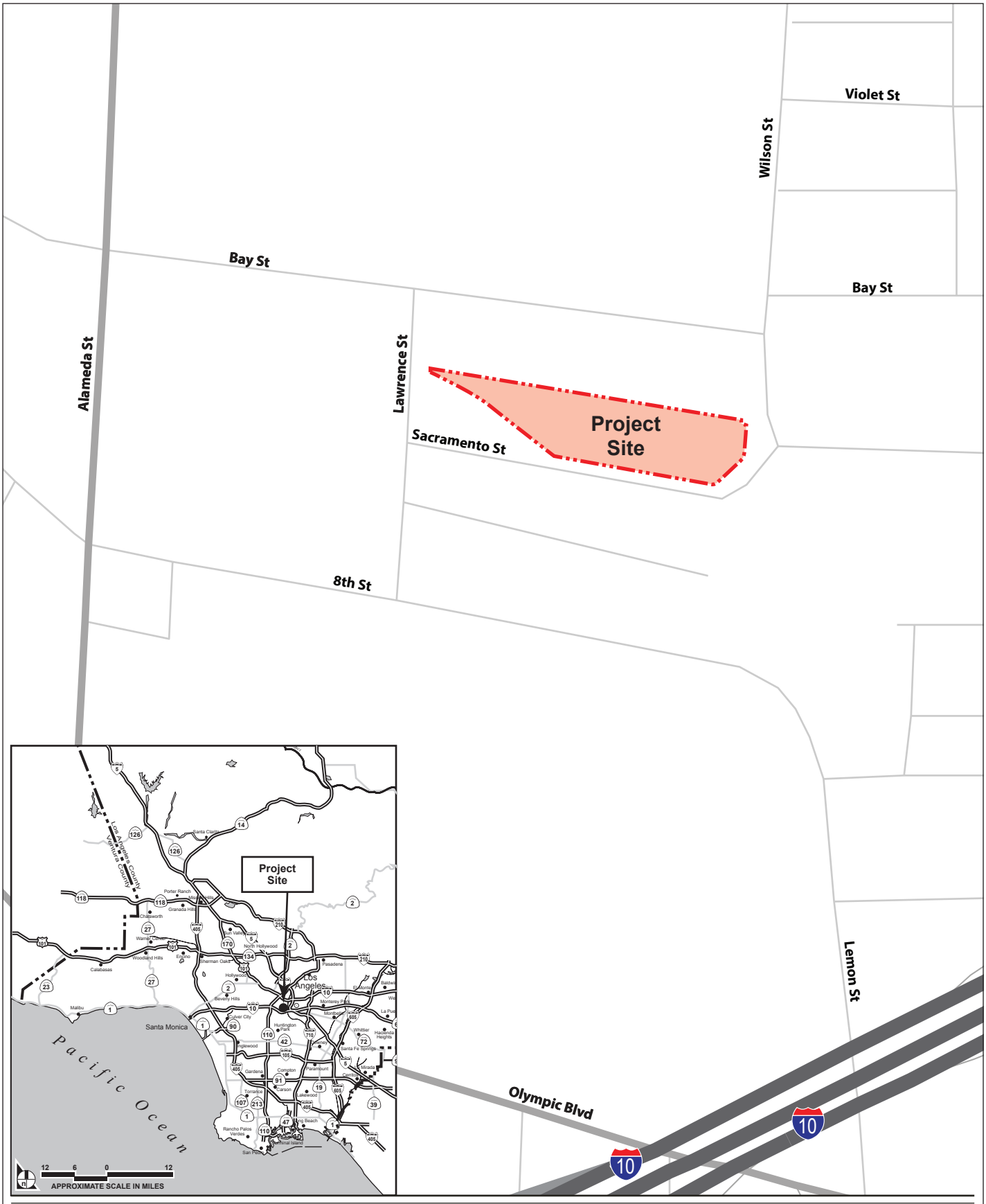

Figure 1
Project Location Map

Source: ArGIS, 2022; Eyestone Environmental, 2023.

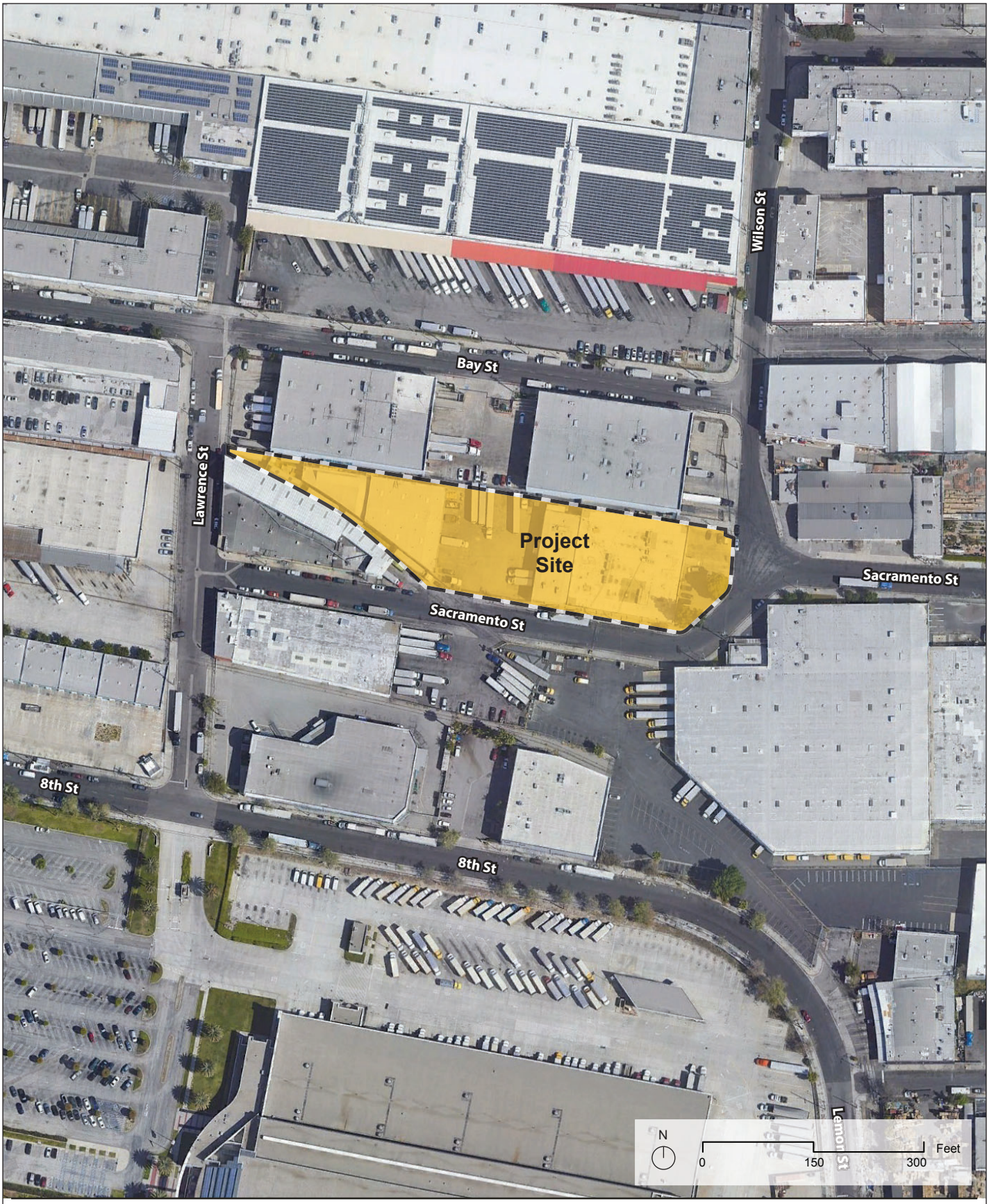

Figure 2
Aerial Photograph of the Project Vicinity

Source: Google Maps, 2022; Eyestone Environmental, 2023.

Sacramento Street and Wilson Street. The Project Site is well served by a variety of public transit options, including local and regional bus lines, subway stations, and regional rail service providing ample connections to local and regional destinations. In particular, the Project Site is located within 0.5 mile of Los Angeles County Metropolitan Transit Authority (Metro) Bus Lines 60 and 62 located at 7th Street and Decatur Street, and 66 located at Olympic Boulevard and Lawrence Street. The Project Site is also located approximately 1.2 miles from the Metro A Line Washington Station and 1.5 miles from the Metro L Line Little Tokyo/Arts District Station, both of which provide connections to regional destinations.

3.2.2 Existing Conditions

The Project Site is currently developed with three warehouse buildings comprised of 40,479 square feet of floor area and associated surface parking. The existing buildings are currently used for storage and warehouse purposes. Existing vehicular access to the Project Site is currently available via a gated driveway on Sacramento Street, which provides ingress and egress to the surface parking lot located between the existing warehouse buildings. The Project Site is relatively flat with limited ornamental landscaping. A total of five trees were inventoried, including three on-site trees and two street trees. Street trees and trees within the Project Site consist of various non-native species, including Lemon Bottlebrush and Canary Island Pine. None of the trees inventories are considered to be protected by the City of Los Angeles Protected Tree and Shrubs ordinance No. 186,873.[3,4]

The Project Site is designated by the Central City North Community Plan as Heavy Manufacturing and is zoned M3-1-RIO (Heavy Industrial Zone, Height District 1 River Implementation Overlay District) by the Los Angeles Municipal Code (LAMC). The M3 Zone permits a wide array of land uses such as storage yards, as well as office and commercial uses. The Height District 1 designation, in conjunction with the M3 Zone, does not impose a maximum building height limitation but does impose a maximum floor area ratio (FAR) of 1.5:1. The "RIO" designation indicates that the Project Site is located within the River Implementation Overlay District (RIO), which is designed to provide for preservation of tributaries and rivers in the City of Los Angeles by promoting river identity and supporting local species and convenient access, among many other aspects.

The Project Site is located within a Transit Priority Area (TPA), as defined by Senate Bill (SB) 743 and City Zoning Information (ZI) File No. 2452.[5] As discussed above, the Project Site is well served by a variety of public transit options provided by Metro and LADOT that provide connections to Downtown

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[3] Carlberg Associates, City of Los Angeles Tree Inventory Report—1811 Sacramento , Los Angeles, California 90021, March 21, 2023. See Appendix IS-2 of this IS/MND.

[4] Pursuant to the Ordinance No. 186,873 and as defined in LAMC Section 17.02, a protected tree or shrub includes any of the following Southern California indigenous tree species, which measure 4 inches or more in cumulative diameter, 4.5 feet above the ground level at the base of the tree, or any of the following Southern California indigenous shrub species, which measure 4 inches or more in cumulative diameter, 4.5 above the ground level at the base of the shrub: Oak tree; Southern California Black Walnut tree; Western Sycamore tree; California Bay tree; Mexican Elderberry shrub; and Toyon shrub.

[5] SB 743 established new rules for evaluating aesthetic and parking impacts under CEQA for certain types of projects. Specifically, Public Resources Code Section 21099(d) states: "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment." TPAs are areas within 0.5 mile of a major transit stop that are existing or planned. Thus, in accordance with SB 743 and the City's Zoning Information (ZI) No. 2452, the Project's aesthetic and parking impacts are not considered significant as a matter of law.

subway stations. Specifically, the Project Site is located within 0.5 mile from Metro Bus Lines 60 and 62 located at 7th Street and Alameda Street, and 66 located at Olympic Boulevard and Alameda Street.

3.2.3 Surrounding Land Uses

As discussed above, the Project Site is located 0.2 mile north of I-10 and approximately 0.4 mile west of the Los Angeles River. The area surrounding the Project Site is highly urbanized and is improved with a range of industrial, residential, and commercial uses contained in low-rise and mid-rise buildings of varying ages. The surrounding properties are generally zoned as M3, which is consistent with the zoning of the Project Site. Land uses immediately surrounding the Project Site include produce distribution uses to the north; industrial and manufacturing uses to the east across Wilson Street; produce distribution and distribution center uses to the south across Sacramento Street; and various logistics and wholesale uses to the west across Lawrence Street. The topography of the area is flat.

The Project Site is also located within the Arts District, which is undergoing rapid transformation from a largely industrial area to incorporate more mixed use residential and commercial uses. 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, the Arts District is expanding south of 6th Street toward the I-10 Freeway with significant growth in mixed-use residential and commercial development. Former industrial and warehouse buildings that have been 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, numerous ground-up residential and commercial developments have been built, are under construction, or are planned throughout the Arts District.

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

As summarized below on Table 1 on page 11, the Project proposes the demolition of three existing warehouse buildings and the development of a commercial office building with restaurant and retail uses. The Project would provide approximately 277,700 square feet of office space inclusive of approximately 232,500 square feet of interior office space and approximately 45,200 square feet of exterior covered office space. The project also includes, approximately 8,000 square feet of restaurant space, and approximately 5,200 square feet of retail space, resulting in a total floor area of approximately 290,900 square feet and a FAR of approximately 3.92:1 upon completion of the Project. Additionally, the Project would include approximately 41,500 square feet of outdoor areas throughout the Project Site that include exterior office space, outdoor dining space, a rooftop deck and an outdoor amenity deck. The proposed uses would be located within a 15-story building (maximum height of 232 feet). The net zero carbon office building has been designed to redefine the workplace by maximizing the use of indoor and outdoor spaces and further creating a convertible design for the parking garage to be adaptable for future additional office uses. A total of 582 parking spaces would be provided within an above-ground and visually concealed parking garage integrated into levels one through five of the building. The three existing warehouse structures totaling approximately 40,479 square feet of floor area would be removed as part of the Project.

Table 1
Summary of Existing and Proposed Floor Area[a]

Land Use	Floor Area
Existing (All to Be Removed)	
Warehouse/Self-Storage	40,479 sf
Total Existing Floor Area to Be Removed	*40,479 sf*
New Construction	
Office	277,700 sf
Retail	5,200 sf
Restaurant/café	8,000 sf
Total New Construction	*290,900 sf*
Total Floor Area Upon Completion	**290,900 sf**

sf = square feet

[a] *Square footage is calculated pursuant to the Los Angeles Municipal Code (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."*

Source: Eyestone Environmental, 2023.

3.3.2 Design and Architecture

The Project reflects the unique characteristics of the Arts District of Downtown Los Angeles in its creative design, lively retail and community-centric gathering spaces, and integrated public art. As shown in the building sections provided on Figure 3 and Figure 4 on pages 12 and 13, the office building would be comprised of 15 levels integrated with a six-level podium. As shown in Figure 5 on page 14, the ground floor of the office building would feature publicly accessible areas including retail space, a café with outdoor seating areas, as well as an outdoor lobby with frontage along Sacramento Street and Wilson Street, which would enhance pedestrian activity. Exterior office spaces would be provided on Level 3 and Levels 6 through 14, and interior office spaces would be provided on Levels 3 through 14. Additionally, Level 7 would include a restaurant with indoor and outdoor spaces, as well as an outdoor amenity deck. Level 15 would include outdoor areas consisting of a rooftop amenity deck and amenity lounge space for tenants, further activating the Project Site.

Parking would be provided in an above-ground parking podium tucked toward the rear of the Project Site to maintain the existing streetscape and allow activating uses to front the public street faces. In an effort to provide sustainability and flexibility in the design, parking levels would be adaptable for future additional office uses. The parking levels would be designed to adapt to future conditions through efficiencies in the design including a taller than usual floor-to-floor height that correlates to office use and egress stairs and elevator cores designed to service the converted office levels.

In addition, the Project has been designed to be one of the first net zero carbon commercial office buildings in the City for both operational and embodied carbon, and would include sustainable design

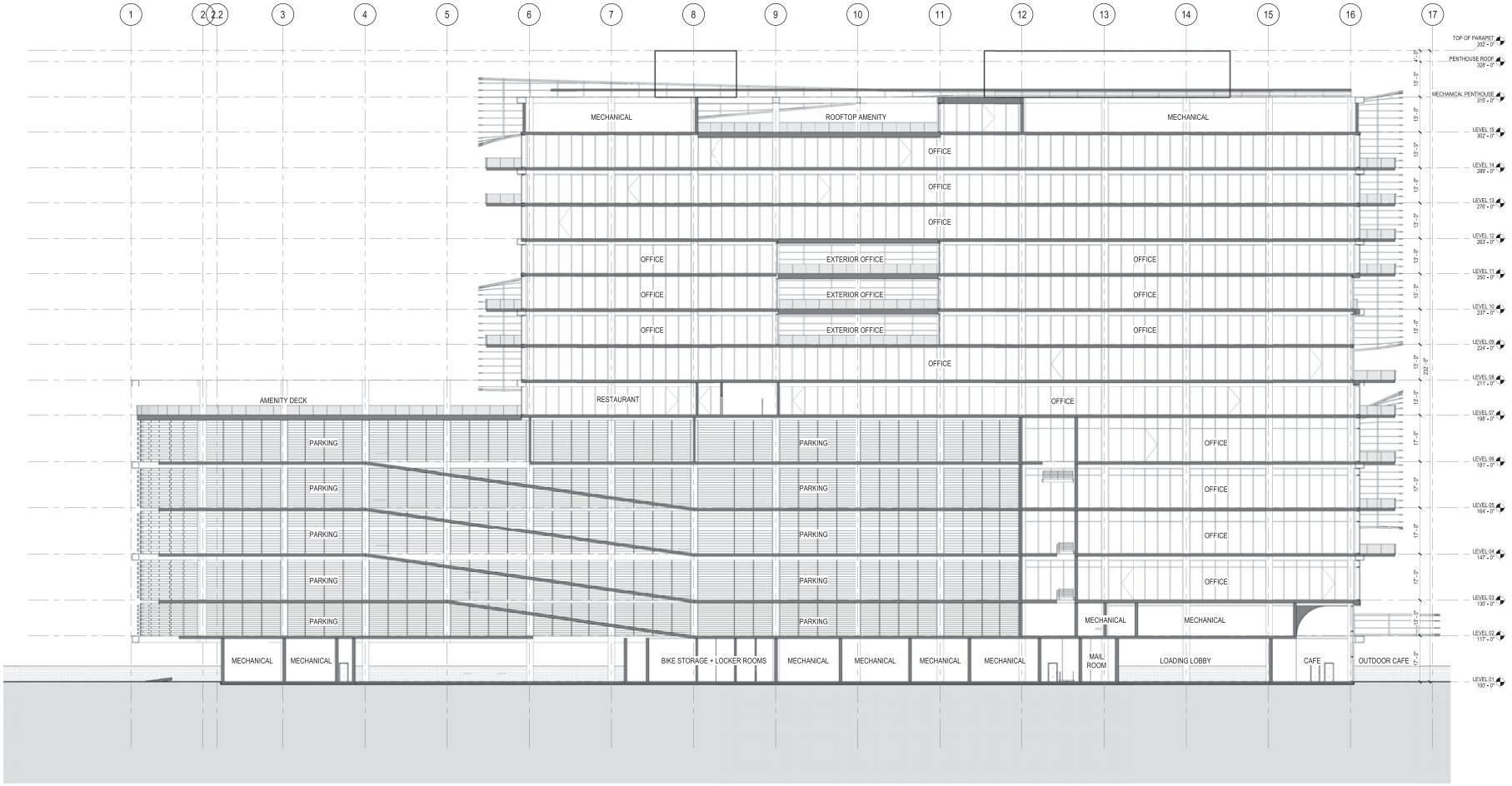


Figure 3
East/West Section

Source: Perkins & Will, 2022.

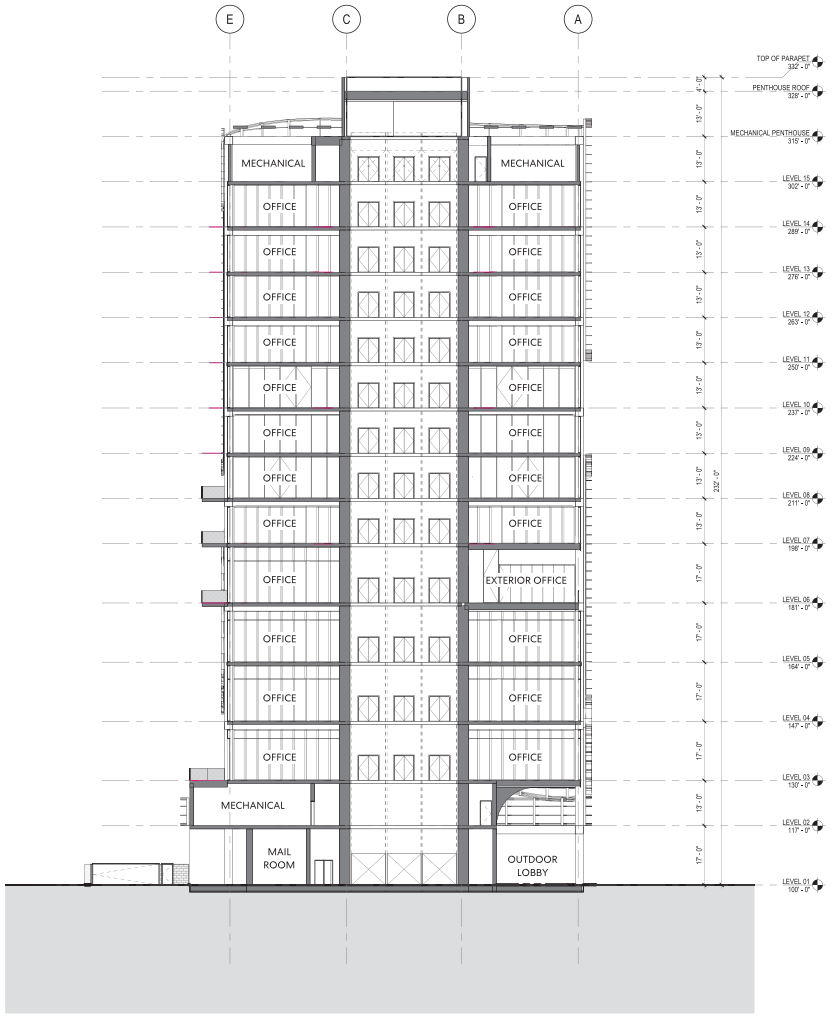
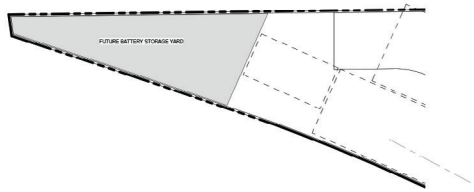


Figure 4
North/South Section

Source: Perkins & Will, 2022.



LEVEL 01 BATTERY STORAGE

LEVEL 01

Figure 5
Ground Floor Conceptual Site Plan

Source: Perkins & Will, 2022.

features that would minimize the building's energy use and future operational carbon as well as improve the health and wellness of occupants. In particular, the Project has been designed such that twenty percent of the Project's programmed office space would be located in covered outdoor areas, and would rely on natural ventilation, the City's temperate climate, and external shading to minimize the Project's energy uses.

The Project would be designed to enhance the appearance of the Arts District, provide architectural diversity, and promote a high level of quality within the existing environment. As shown in the conceptual renderings in Figure 6 and Figure 7 on pages 16 and 17, acknowledging the surrounding context, the Project would rely on common industrial materials such as concrete, glass, and metal, while avoiding the use of cladding or added surface materials. In order to provide articulation and a visually striking frame, the building's façade would be wrapped in colored, aluminum louvers, which would contrast vibrant colors against the textured grid-work of the underlying concrete structure, accentuating the character of the building and function both as a mural and a solar filter, thereby reducing energy use inside the building and improving the comfort of the Project's users.

3.3.3 Open Space and Landscaping

Although there are no open space requirements for commercial uses, the Project would include approximately 41,500 square feet of outdoor areas throughout the Project Site.[6] Specifically, the Project would include 25,500 square feet of exterior (uncovered) office space, 2,100 square feet of outdoor dining, 10,900 square feet of outdoor amenity deck (Level 7), and 3,000 square feet of rooftop deck (Level 15). As shown in Figure 8 on page 18, landscaping elements and outdoor areas would be provided on the ground floor of the proposed office building and would include outdoor dining areas and an open-air lobby. The Project would implement a detailed materials palette outdoors, that would feature heavy timber and wooden benches, concrete pavers, wood decks, and different planters and trees.

The Project would enhance the public realm through streetscape improvements and unique architectural design materials. Specifically, the Project would provide new street trees and planters along Sacramento Street adjacent to the open-air lobby, which would improve the pedestrian experience along this street frontage. The proposed outdoor lobby, retail space, and café with outdoor seating areas located on the ground floor would further enhance the streetscape within the vicinity of the Project Site and promote linkages within the surrounding area. The activation of streetscape would enhance pedestrian activity on the ground floor and throughout the Project Site. In addition, the open-air lobby would be integrated with vibrant colors, accentuating the visual character of the Sacramento streetscape and further enhancing the pedestrian experience.

The Project would remove the three existing on-site trees and two street trees, none of which are protected trees under the City's Protected Tree and Shrubs Ordinance No. 186,873. Pursuant to the requirements of the City's Urban Forestry Division and subject to approval of the Board of Public Works, the onsite trees to be removed would be replaced at a 1:1 ratio, and the street trees to be removed would be replaced at a 2:1 basis. The Project would replace the on-site trees with approximately 12 new trees

[6] Uncovered outdoor areas do not contribute to the Project's FAR. This includes all open to the sky terraces, balconies, and 5-foot covered balconies.

Figure 6
Conceptual Rendering Looking West on Wilson Street

Source: Perkins & Will, 2022.

Figure 7
Conceptual Rendering Looking North on Sacramento Street

Source: Perkins & Will, 2022.

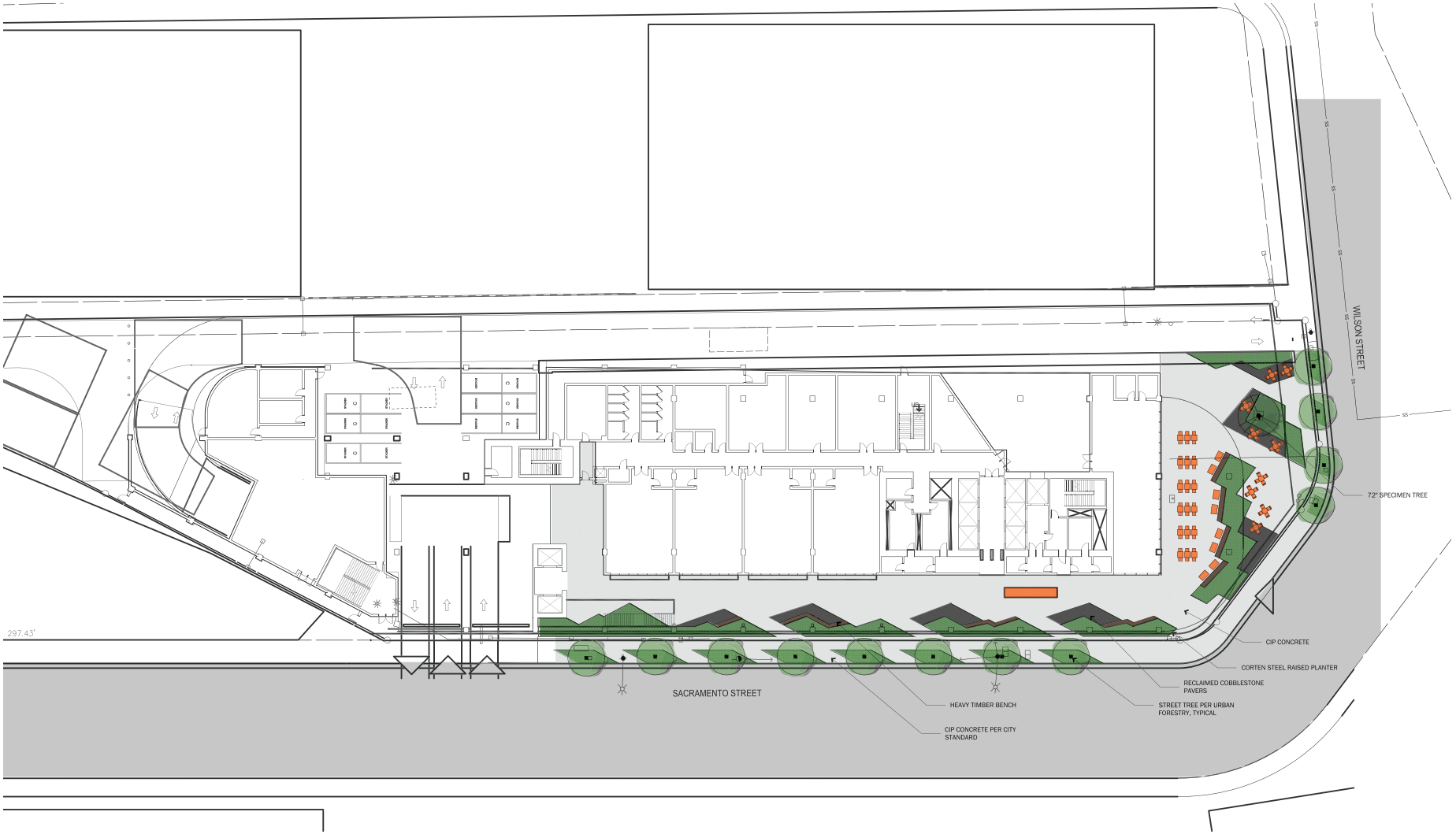


Figure 8
Conceptual Open Space and Landscape Plan

Source: Perkins & Will, 2022.

inclusive of Golden Medallion trees and Fruitless Olive trees. In addition, the existing street trees would be replaced with 12 new street trees inclusive of Engleman Oak trees and Hong Kong Orchid trees.

3.3.4 Access, Circulation, and Parking

Vehicular access to the Project Site would be provided via a primary driveway off of Sacramento Street, with through access to a rear driveway and fire-lane that provides ingress and egress out to Wilson Street. Pedestrian access to the Project Site would be provided via a pedestrian access path along Wilson and Sacramento Street, which would safely pull pedestrians from the adjacent right-of-way into the Project Site. Additionally, the proposed outdoor lobby would provide multiple access points for pedestrians along Sacramento Street and Wilson Street.

With regard to parking, the Project would provide a total of 582 parking spaces in six above-ground parking levels that would be integrated into a podium and screened from view from public streets. Of the 582 parking spaces, 117 spaces would provide Electric Vehicle Charging Stations (EVCS) and 175 spaces would be prewired to accommodate the placement of future EVCS. In addition, the Project would provide a total of 98 bicycle parking spaces, including 63 long-term spaces and 35 short-term spaces. The Project would also provide bike storage and locker rooms.

3.3.5 Lighting and Signage

Proposed signage would include mounted Project identity signage, general ground-level and wayfinding pedestrian and vehicular signage, and security markings in compliance with code requirements. Project identity signage would be visible from off-site vehicular and pedestrian traffic and serve as identifiers for the Project. Wayfinding signs would be located at the parking garage entrances and exits, at building lobbies, on the interior-facing faces of stages, and on the ground level throughout the Project Site, and would be integrated into the overall design of the building. In addition, signage would be proposed throughout the Project Site on the exterior of building fronting the public rights-of-way. No digital and off-site signage would be provided. All proposed signage would be designed to be aesthetically compatible with the existing and proposed architecture of the Project Site and would comply with all LAMC and sign ordinances.

All lighting would comply with current energy standards and codes while providing appropriate light levels to accent signage, architectural features, and landscaping elements. Light sources would be shielded and/or directed toward Project Site areas to minimize light spill-over to neighboring properties and the surrounding area while utilizing low-level exterior lights at the site perimeter, as needed, for aesthetic, security, and wayfinding purposes. Additionally, new street and pedestrian lighting within the public right-of-way would provide appropriate and safe lighting levels on both sidewalks and roadways, while minimizing light and glare on adjacent properties, in compliance with applicable City regulations and with approval by the Bureau of Street Lighting. Glass in building façades would be selected for qualities such as low reflectivity to reduce glare; energy efficiency to limit solar heat gain; high visibility for adequate light transmission; and acoustic performance to reduce noise from outside.

3.3.6 Site Security

During construction, the Project Applicant would implement temporary security measures including security fencing, lighting, and locked entry. Upon completion of the Project and prior to the issuance of a

certificate of occupancy, the Project Applicant would submit a diagram of the Project Site to the LAPD's Newton Area Commanding Officer that includes access routes and any additional information that might facilitate police response.

In addition, the Project would include a closed circuit camera system and keycard entry. The Project would provide proper lighting of the building and walkways to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into the building. The Project would also provide sufficient lighting of parking areas to maximize visibility and reduce areas of concealment. Furthermore, the Project would design building entrances and exits, open spaces, and pedestrian walkways to be open and in view of surrounding sites.

3.3.7 Sustainability Features

The Project has been designed and would be constructed to incorporate environmentally sustainable building features equivalent to Platinum certification under the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED®) Rating System for new construction, and environmentally sustainable building features and construction standards required by the Los Angeles Green Building Code and CALGreen. These features and standards would reduce the Project's energy and water usage and would thereby also reduce the Project's associated greenhouse gas emissions and help minimize its impacts on natural resources and infrastructure. In addition to complying with the City's regulations, the Project also aims to be one of the first Net Zero Carbon office building in the City for both operational and embodied carbon. The Project also aims to be certified for International Living Future Institute, Fitwel, and Wiredscore compliance, which would require the Project to incorporate additional decarbonization, environmentally friendly, and health-protective features.

In accordance with CALGreen requirements, the Project would provide a photovoltaic system that would generate 455,000 kWh per year into the roof of the proposed office building. In addition, 30 percent of the Project's parking spaces would be designated as Electric Vehicle (EV) spaces capable of supporting future electric vehicle supply equipment (EVSE) and 20 percent of the spaces will be equipped with EV Charging Stations.

3.3.8 Anticipated Construction Schedule

Project construction activities would begin with the demolition of the existing warehouse structures. The next phase would include grading and excavation, which would extend to a depth of approximately 11 feet below ground surface. The foundation would be laid, followed by building construction, and then finally paving and landscape installation. As previously discussed, construction delivery/haul trucks would travel on approved truck routes between the Project Site and the Santa Monica Freeway (I-10). Incoming trucks would travel from the I-10, exit onto 8th Street, heading west, turn right onto Mateo Street, turn left onto Sacramento Street to the Project site. Departing trucks would exit the Project site onto Sacramento Street, heading east, turn right onto Mateo Street, heading south, turn left onto Porter Street, heading east, and onto the I-10 Freeway. Project construction is anticipated to commence in 2024 and be completed in 2026. It is estimated that approximately 11,800 cubic yards of export would be hauled off the Project Site.

3.4 REQUESTED PERMITS AND APPROVALS

The list below includes the anticipated requests for approval of the Project. The Mitigation Negative Declaration will analyze impacts associated with the Project and will provide environmental review sufficient for all necessary entitlements and public agency actions associated with the Project. The discretionary entitlements, reviews, permits and approvals required to implement the Project include, but are not necessarily limited to, the following:

- **General Plan Amendment (GPA),** pursuant to LAMC Section 11.5.6, to amend footnotes 1 and 6 of the Central City North Community Plan to include the Project Site.
- **Vesting Zone Change (VZC) and Height District Change (HD)**, pursuant to LAMC Section 12.32Q from M3-1-RIO to [T][Q] M3-2D-RIO to increase floor area to 3.92:1. Pursuant to the authority granted in LAMC Section 12:32:
  - **Waiver of Improvements** to waive the requirement to widen and improve Wilson Street by a variable 6 to 13 feet, with a full-width roadway, leaving the existing curb face in its current location.
  - **Waiver of Improvements** to waive the requirement to widen and improve Sacramento Street by 3 feet with a full-width roadway, leaving the existing curb face in its current location.
- **Main Conditional Use Permit**, pursuant to LAMC Section 12.24.W.1, to allow the sale and dispensing of a full line of alcoholic beverages for on-site and off-site consumption in conjunction a total of 26,500 square feet of indoor and outdoor space within up to 9 venues, with a total of 524 indoor seats and 715 outdoor seats.
- **Site Plan Review**, pursuant to LAMC Section 16.05, for a development project that results in a net increase of 50,000 gross square more of non-residential floor area.
- 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, building permits, and sign permits.

3.5 RESPONSIBLE & TRUSTEE PUBLIC AGENCIES

A Responsible Agency under CEQA is a public agency with some discretionary authority over a project or a portion of it, but which has not been designated the Lead Agency (State CEQA Guidelines Section 15381). The list below identifies whether any responsible agencies have been identified for the Project.

- No responsible public agencies have been identified for this Project.

A Trustee Agency under CEQA is a public agency having jurisdiction by law over natural resources affected by a project which are held in trust for the people of the State.

- No trustee agencies have been identified for this Project.

4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

Senate Bill (SB) 743 [Public Resources Code (PRC) §21099(d)] sets forth new guidelines for evaluating project transportation impacts under CEQA, as follows: "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) 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 "employment center project" as "a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area. 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.

The related City of Los Angeles Department of City Planning Zoning Information (ZI) File ZI No. 2452 provides further instruction concerning the definition of transit priority projects and that "visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA.""[7]

PRC Section 21099 applies to the Project. Specifically, pursuant to PRC Section 21099, the Project is an employment center project located on an infill site within a TPA. The Project Site is located on an infill site, as that term is defined in PRC Section 21099(a)(4), because the Project Site is located in a highly urbanized area of the City of Los Angeles (City) and includes lots located within this urban area that has been previously developed. In addition, the Project Site is also located within a TPA because it is located within 0.5 mile of an existing "major transit stop." In particular, the Project Site is located within 0.5 mile of the bus stops for Los Angeles County Metropolitan Transit Authority (Metro) Bus Lines 60 and 62 located at 7th Street and Alameda Street, and Bus Line 66 located at Olympic Boulevard and Alameda Street. The City's Zone Information and Map Access System (ZIMAS) also confirms the Project Site's location within a TPA, as defined in ZI No. 2452. Therefore, in accordance with PRC Section 21099(d)(1), the

[7] City of Los Angeles Department of City Planning, Zoning Information File ZA No. 2452, Transit Priority Areas (TPAs)/Exemptions to Aesthetics and Parking Within TPAs Pursuant to CEQA. Available at: http://zimas.lacity.org/documents/zoneinfo/ZI2452.pdf. Accessed November 16, 2023.

Project's aesthetic impacts shall not be considered significant impacts on the environment and do not require evaluation under CEQA.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

a. Would the project have a substantial adverse effect on a scenic vista?

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

c. In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

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

Less Than Significant Impact. Pursuant to PRC Section 21099, the Project is an employment center project that would be located on an infill site within a TPA. Therefore, in accordance with PRC Section 21099(d)(1), the Project's aesthetic impacts shall not be considered significant impacts on the environment and therefore do not have to be evaluated under CEQA. Project impacts to aesthetic resources would be less than significant and no mitigation measures are required.

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.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

a. Would the project 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?

b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

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

d. Would the project result in the loss of forest land or conversion of forest land to non-forest use?

e. Would the project 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 within an urbanized area of the City. As discussed in Section 2, Project Description, of this IS/MND, the Project Site is currently developed with three warehouse structures and associated surface parking. No agricultural uses or operations occur on-site or in the vicinity of the Project Site.[8] Furthermore, the Project Site and surrounding area are 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.[9] Additionally, the Project Site and surrounding area are not enrolled under the California Land Conservation Act and are not subject to a Williamson Act Contract.[10] The Project Site does not include any forest land or timberland, and is not zoned for forest land or used as forest land.[11] Therefore, no impacts to agricultural and forestry resources would occur, and no mitigation measures are required.

III. AIR QUALITY

Where available, the significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b. 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?	☐	☐	☒	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

[8] City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5166-030-008; -009, http://zimas.lacity.org/, accessed November 16, 2023.

[9] California Department of Conservation, California Important Farmland Finder, https://maps.conservation.ca.gov/dlrp/ciff/, accessed February 17, 2023.

[10] City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5166-030-008; -009, http://zimas.lacity.org/, accessed November 16, 2023.

[11] City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5166-030-008; -009, http://zimas.lacity.org/, accessed November 16, 2023.

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. The Project Site is located within the 6,745-square-mile South Coast Air Basin (Basin), which includes all of Orange County and portions of Los Angeles, Riverside, and San Bernardino Counties. The South Coast Air Quality Management District (SCAQMD) is the air pollution control agency for the Basin and is required, pursuant to the federal Clean Air Act,[12] to reduce emissions of criteria pollutants for which the Basin is in non-attainment (i.e., ozone [O_3], particulate matter [PM_{10}], and fine particular matter [$PM_{2.5}$]). SCAQMD's 2022 Air Quality Management Plan (2022 AQMP) is the regional blueprint for achieving air quality standards and includes integrated strategies and measures needed to meet the National Ambient Air Quality Standards (NAAQS), particularly for the eight-hour Ozone.[13] 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.[14] With regard to future growth, SCAG has prepared the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy, referred to as Connect SoCal (2020–2045 RTP/SCS) which provides population, housing, and employment projections for cities under its jurisdiction.[15] The growth projections in the 2020–2045 RTP/SCS are based in part on projections originating under County and City General Plans. Because the 2020–2045 RTP/SCS was just recently adopted in September of 2020, its growth projections were used in the preparation of the air quality forecasts and consistency analysis included in the 2022 AQMP.[16]

The 2022 AQMP relies on emissions forecasts made based on demographic and economic growth projections provided by SCAG's 2020–2045 RTP/SCS. SCAG is charged by California law to prepare and approve "the portions of each AQMP relating to demographic projections and integrated regional land use, housing, employment, and transportation programs, measures and strategies." Projects whose growth is included in the projections used in the formulation of the AQMP are considered to be consistent with that plan and not to interfere with its attainment.[17] The SCAQMD recommends that, when determining whether a project is consistent with the current AQMP, a lead agency assess whether the project would directly obstruct implementation of the plan and whether it is consistent with the demographic and economic assumptions (typically land use related, such as resultant employment or residential units) upon which the plan is based.

As previously described, the Project proposes the demolition of three existing warehouse buildings and the development of a commercial office building with restaurant and retail uses. The Project would provide approximately 277,700 square feet of office space inclusive of approximately 232,500 square feet

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12 United States Environmental Protection Agency, Summary of the Clean Air Act, www.epa.gov/laws-regulations/summary-clean-air-act, accessed April 12, 2023.

13 SCAQMD, Final 2022 AQMP, approved on November 16, 2022.

14 SCAG serves as the federally designated metropolitan planning organization (MPO) for the southern California region.

15 SCAG, Connect SoCal (2020–2045 RTP/SCS), adopted September 2020.

16 SCAG, Connect SoCal (2020–2045 RTP/SCS), adopted September 2020.

17 SCAQMD, CEQA Air Quality Handbook, p. 12-1.

of interior office space and approximately 45,200 square feet of exterior covered office space. The project also includes approximately 8,000 square feet of restaurant space, and approximately 5,200 square feet of retail space, resulting in a total floor area of approximately 290,900 square feet upon completion of the Project.

The Project would be consistent with the vehicle miles travelled (VMT) reduction policies included in SCAG's 2020–2045 RTP/SCS. Specifically, consistent with the 2020–2045 RTP/SCS alignment of transportation, land use, and housing strategies, the Project would provide employees and visitors with convenient access to public transit, which would facilitate a reduction in VMT. As shown in Appendix IS-12 of this IS/MND, the Project's internal capture and transportation demand management (TDM) plan would reduce the number of vehicular trips and related VMT by approximately 34 percent. The Project's estimated VMT reductions would be consistent with regional strategies and would be consistent with and support the goals and benefits of the SCAG RTP/SCS, which seeks improved mobility and access by placing destinations closer together and decreasing the time and cost of traveling between them. Thus, consistent with 2020–2045 RTP/SCS, the Project would reduce VMT, and, consequently, the Project's mobile source emissions would be reduced.

As discussed in Response to Checklist Question XIV.a, Population and Housing, below, the Project is consistent with the regional growth projections for the Los Angeles Subregion. As noted above in the Project Description, the Project would not introduce new homes at the Project Site and would therefore not result in direct population growth in the area. Based on employee generation rates promulgated by the City of Los Angeles VMT Calculator Documentation and also provided in the Project's Transportation Assessment, the Project would generate approximately 1,153 employees.[18] According to SCAG's 2020–2045 RTP/SCS, there are approximately 1,917,721 employees within the City of Los Angeles in 2023 and approximately 1,947,472 employees are projected within the City for 2026, the Project's buildout year, which would be an increase of 29,752 employees. Thus, the Project's estimated 1,140 net new employees would constitute 3.83 percent of the employment growth forecasted between 2023 and 2026. While some of the new employment positions could be filled by persons who would relocate to the vicinity of the Project Site, this potential increase in population would not be substantial since not all employees would move close to the Project Site. Specifically, some employment opportunities may be filled by persons already residing in the vicinity of the Project Site and other persons would commute to the Project Site from other communities in and outside of the City. Therefore, the increase in employees would be well within the existing employment projections for the community and region. Because the Project would result in a minimal increase in permanent employment, it would be consistent with the demographic projections set forth in SCAG's 2020–2045 RTP/SCS that were used in the 2022 AQMP. Thus, the Project would not conflict with or obstruct implementation of the 2022 AQMP.

In addition, the Project would not conflict with or obstruct implementation of the City's General Plan Air Quality Element.[19] The City's General Plan Air Quality Element identifies policies and strategies for advancing the City's clean air goals. To achieve the goals of the Air Quality Element, performance-based standards have been adopted by the City of Los Angeles to provide flexibility in implementation of its

[18] Gibson Transportation Consulting, Transportation Assessment for the 1811 Sacramento Project, May, 2023. See Appendix IS-12.1 of this IS/MND.

[19] Department of City Planning Los Angeles, General Plan Air Quality Element, November 1992.

policies and objectives. The goal, objectives, and policies provided in the City's Air Quality Element applicable to the Project include the following:

- **Goal 1:** Good air quality and mobility in an environment of continued population growth and healthy economic structure.

- **Objective 1.1:** It is the objective of the City of Los Angeles to reduce air pollutants consistent with the Regional Air Quality Management Plan (AQMP), increase traffic mobility, and sustain economic growth citywide.

- **Objective 1.3:** It is the objective of the City of Los Angeles to reduce particulate air pollutants emanating from unpaved areas, parking lots, and construction sites.

- **Policy 1.3.2:** Minimize particulate emissions from unpaved roads and parking lots which are associated with vehicular traffic.

- **Policy 4.2.3:** Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.

The Project's location within an existing developed urban area would reduce VMT and related vehicle emissions in comparison to a project located in a non-urban environment as discussed further in Checklist Question No. XVII, Transportation, and Appendix IS-12.1, Transportation Assessment, of this IS/MND. The Project Site is also located within the Los Angeles Arts District, with substantial growth in mixed-use residential and commercial development. As such, high population density would result in employees and visitors potentially living closer to the Project Site, reducing travel distances and overall VMT. In addition, the Project includes short- and long-term bicycle parking spaces (i.e., 98 bicycle parking spaces consisting of 35 short-term and 63 long-term spaces), shower/changing facilities, pedestrian-friendly features and on-site EV and EV-ready parking, and the Project Site provides convenient access to public transit, all of which encourages multi-modal transportation and facilitates a reduced use of vehicular use and a reduction in VMT as discussed in Section XVII and the Transportation Assessment.

As shown in Table 2 through Table 5 on pages 29 through 32, respectively, Project implementation would not exceed the SCAQMD localized significance thresholds which were developed to ensure no exceedances of the California or federal ambient air quality standards or thresholds. As the Project would not increase the frequency or severity of an existing air quality violation or cause or contribute to new violations for air quality pollutants (including VOC, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$), the Project also would not delay timely attainment of air quality standards or interim emission reductions specified in the 2022 AQMP. In addition, the Project would be consistent with the population and employment growth projections in the AQMP.

Based on the above, the Project would not conflict with or obstruct implementation of the SCAQMD's AQMP or the City's General Plan Air Quality Element. Impacts would be less than significant, and no mitigation measures are required.

Table 2
Project-Related Winter Regional and Localized Unmitigated Construction Emissions[a]
(pounds per day)

Emission Type	VOC[b]	NO_X	CO	SO_X	PM_{10}[c]	$PM_{2.5}$[c]
Regional Emissions						
2024	2	37	46	<1	8	2
2025	2	17	34	<1	5	1
2026	1	17	33	<1	5	1
Maximum Regional Emissions	**2**	**37**	**46**	**<1**	**8**	**2**
SCAQMD Regional Construction Daily Significance Threshold	75	100	550	150	150	55
Over/(Under)	(73)	(63)	(504)	(150)	(142)	(53)
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Localized Emissions						
2024		14	40		2	<1
2025		11	20		<1	<1
2026		11	20		<1	<1
Maximum Localized Emissions		**14**	**40**		**6**	**1**
SCAQMD Localized Significance Threshold[d]	—	88	3,310		74	36
Over/(Under)	—	(75)	(3,270)		(72)	(34)
Exceed Threshold?	**—**	**No**	**No**	**—**	**No**	**No**

[a] *Compiled using the CalEEMod emissions model. The equipment mix and use assumptions for each phase are provided in Appendix IS-1 of this IS/MND. CalEEMod modeling outputs are provided in Appendix IS-1 of this IS/MND. Numbers may not add up exactly due to rounding.*

[b] *CalEEMod calculates Volatile Organic Compounds (VOC) from architectural coatings and Reactive Organic Gases (ROG) from mobile sources. Both VOC and ROG are precursors to ozone so they are summed in the CalEEMod report under the header ROG. For purposes of comparing the ROG value to a VOC significance threshold, the terms can be used interchangeably.*

[c] *PM_{10} and $PM_{2.5}$ emission estimates assume compliance with SCAQMD Rule 403 requirements for fugitive dust suppression.*

[d] *The SCAQMD LSTs are based on Source Receptor Area No. 1 (Downtown Los Angeles) for a 1.71-acre site with a 200-meter receptor distance. Please refer to SCAQMD Localized Significance Threshold Methodology, Appendix C, July 2008.*

Source: Eyestone Environmental, 2023.

Table 3
Project-Related Summer Regional and Localized Unmitigated Construction Emissions[a]
(pounds per day)

Emission Type	VOC[b]	NO_X	CO	SO_X	PM_{10}[c]	$PM_{2.5}$[c]
Regional Emissions						
2024	2	20	38	<1	5	1
2025	2	17	36	<1	5	1
2026	34	16	35	<1	5	1
Maximum Regional Emissions	**34**	**20**	**38**	**<1**	**5**	**1**
SCAQMD Regional Construction Daily Significance Threshold	75	100	550	150	150	55
Over/(Under)	(41)	(80)	(513)	(150)	(145)	(54)
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Localized Emissions						
2024		11	27		1	<1
2025		11	20		<1	<1
2026		11	20		<1	<1
Maximum Localized Emissions		**11**	**27**		**1**	**<1**
SCAQMD Localized Significance Threshold[d]	—	88	3,310		74	36
Over/(Under)	—	(77)	(3,283)		(72)	(35)
Exceed Threshold?	**—**	**No**	**No**	**—**	**No**	**No**

[a] *Compiled using the CalEEMod emissions model. The equipment mix and use assumptions for each phase are provided in Appendix IS-1 of this IS/MND. CalEEMod modeling outputs are provided in Appendix IS-1 of this IS/MND. Numbers may not add up exactly due to rounding.*

[b] *CalEEMod calculates Volatile Organic Compounds (VOC) from architectural coatings and Reactive Organic Gases (ROG) from mobile sources. Both VOC and ROG are precursors to ozone so they are summed in the CalEEMod report under the header ROG. For purposes of comparing the ROG value to a VOC significance threshold, the terms can be used interchangeably.*

[c] *PM_{10} and $PM_{2.5}$ emission estimates assume compliance with SCAQMD Rule 403 requirements for fugitive dust suppression.*

[d] *The SCAQMD LSTs are based on Source Receptor Area No. 1 (Downtown Los Angeles) for a 1.71-acre site with a 195-meter receptor distance. Please refer to SCAQMD Localized Significance Threshold Methodology, Appendix C, July 2008.*

Source: Eyestone Environmental, 2023.

Table 4
Project-Related Winter Regional and Localized Unmitigated Operational Emissions—Net Increase[a]
(pounds per day)

Emission Type/Source	VOC[b]	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Regional Emissions						
Area	6	<1	<1	<1	<1	<1
Energy (Natural Gas)	-<1	-<1	-<1	-<1	-<1	-<1
Mobile	8	6	62	<1	6	1
Stationary (Emergency Generator)	<1	1	1	<1	<1	<1
Project Regional Emissions	**15**	**8**	**63**	**<1**	**6**	**1**
SCAQMD Regional Significance Threshold	55	55	550	150	150	55
Over/(Under)	(40)	(47)	(487)	(150)	(144)	(54)
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Localized Emissions						
Project Localized Emissions[c]		**1**	**1**		**<1**	**<1**
Localized Significance Threshold[d]	—	88	3,310	—	18	9
Over/(Under)	—	(87)	(3,309)		(18)	(9)
Exceed Threshold?	**—**	**No**	**No**	**—**	**No**	**No**

Note: Numbers may not add up exactly due to rounding

[a] *Worksheets and modeling output files are provided in Appendix IS-1 of this IS/MND.* The table reflects Project emissions (i.e., Buildout emissions less existing emissions for the Buildout year (2026)).

[b] *CalEEMod calculates Volatile Organic Compounds (VOC) from architectural coatings and Reactive Organic Gases (ROG) from mobile sources. Both VOC and ROG are precursors to ozone so they are summed in the CalEEMod report under the header ROG. For purposes of comparing the ROG value to a VOC significance threshold, the terms can be used interchangeably.*

[c] *Localized emissions include area, energy and stationary sources.*

[d] *The SCAQMD LSTs are based on Source Receptor Area No. 1 (Central Los Angeles) for a 1.71-acre site with a 195-meter receptor distance. Please refer to SCAQMD Localized Significance Threshold Methodology, Appendix C, July 2008.*

Source: Eyestone Environmental, 2023.

Table 5
Project-Related Summer Regional and Localized Unmitigated Operational Emissions—Net Increase[a]
(pounds per day)

Emission Type/Source	VOC[b]	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Regional Emissions						
Area	9	<1	21	<1	<1	<1
Energy (Natural Gas)	-<1	-<1	-<1	-<1	-<1	-<1
Mobile	8	6	67	<1	6	1
Stationary (Emergency Generator)	<1	1	1	<1	<1	<1
Project Regional Emissions	**18**	**7**	**89**	**<1**	**6**	**1**
SCAQMD Regional Significance Threshold	55	55	550	150	150	55
Over/(Under)	(37)	(48)	(461)	(150)	(144)	(54)
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Localized Emissions						
Project Localized Emissions[c]		**1**	**22**		**<1**	**<1**
Localized Significance Threshold[d]	—	88	3,310	—	18	9
Over/(Under)	—	(86)	(3,288)		(18)	(9)
Exceed Threshold?	**—**	**No**	**No**	**—**	**No**	**No**

Note: Numbers may not add up exactly due to rounding

[a] *Worksheets and modeling output files are provided in Appendix IS-1 of this IS/MND. The table reflects Project emissions (i.e., Buildout emissions less existing emissions for the Buildout year (2026)).*

[b] *CalEEMod calculates Volatile Organic Compounds (VOC) from architectural coatings and Reactive Organic Gases (ROG) from mobile sources. Both VOC and ROG are precursors to ozone so they are summed in the CalEEMod report under the header ROG. For purposes of comparing the ROG value to a VOC significance threshold, the terms can be used interchangeably.*

[c] *Localized emissions include area, energy and stationary sources.*

[e] *The SCAQMD LSTs are based on Source Receptor Area No. 1 (Central Los Angeles) for a 1.71-acre site with a 195-meter receptor distance. Please refer to SCAQMD Localized Significance Threshold Methodology, Appendix C, July 2008.*

Source: Eyestone Environmental, 2023.

b. Would the project 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?

Less Than Significant Impact. As indicated above, the Project Site is located within the Basin, which is characterized by relatively poor air quality. State and federal air quality standards are often exceeded in many parts of the Basin, including the monitoring stations closest to the Project Site, which exceed the most stringent ambient air quality standard for ozone and particulate matter. The closest monitoring station is the North Main Street Station, located at 1630 North Main Street in the City of Los Angeles, approximately 2.5 miles north of the Project Site. The Project would contribute to local and regional air pollutant emissions during construction (short-term) and Project occupancy (long-term). However, as demonstrated by the following analysis, construction and operation of the Project would result in less than

significant impacts relative to the daily significance thresholds for criteria air pollutant emissions established within the SCAQMD CEQA Air Quality Handbook.[20]

Construction

Construction of the Project would have the potential to create regional air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers and delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities),[21] In addition, fugitive dust emissions would result from site preparation, grading and construction activities. Mobile source emissions, primarily particulate matter and nitrogen oxides (NO_X) would result from the use of off-road construction equipment such as loaders, graders, backhoes, haul and materials trucks and employee vehicles. During the finishing phase, paving operations and the application of architectural coatings (e.g., paints) and other building materials would release volatile organic compounds (VOCs). Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

Based on criteria set forth in the SCAQMD CEQA Air Quality Handbook, a project would have the potential to violate an air quality standard or contribute substantially to an existing violation and result in a significant impact with regard to construction emissions if regional emissions from both direct and indirect sources would exceed any of the following SCAQMD prescribed threshold levels: (1) 75 pounds a day for VOCs; (2) 100 pounds per day for NO_X; (3) 550 pounds per day for carbon monoxide (CO); (4) 150 pounds per day for sulfur oxides (SO_X); (5) 150 pounds per day for PM_{10}; and (6) 55 pounds per day for $PM_{2.5}$.[22]

Construction activities would include site preparation, grading, paving, building construction, and architectural coatings. Construction would occur over approximately 31-month period (e.g., early-2024 to mid-2026). Construction would require approximately 11,800 cy of total soil export. Additional details are provided in Appendix IS-1 of this IS/MND.

Regional Impacts

Regional construction-related emissions were calculated using the SCAQMD-recommended California Emissions Estimator Model (CalEEMod) Version 2022.1.1. Model results are provided in Appendix IS-1 of this IS/MND. The analysis assumes that all construction activities would comply with SCAQMD Rule 403 regarding the control of fugitive dust and compliance with Rule 1113 requiring use of low VOC paints. A summary of unmitigated maximum daily regional emissions for Project construction is presented in Table 2 and Table 3 on pages 29 and 30 along with the regional significance thresholds for each air pollutant.

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[20] SCAQMD, Air Quality Analysis Guidance Handbook, www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook, accessed April 12, 2023.

[21] Construction assumptions are contained in Appendix IS-1 of this IS/MND, Construction Schedule and Equipment Requirements, and were obtained from DPR Construction. Construction emissions conservatively do not account for the offsetting emissions from decommissioning of existing operational uses during construction. All construction emissions are considered new emissions.

[22] SCAQMD, Air Quality Analysis Guidance Handbook, www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook, accessed April 12, 2023.

As shown in Table 2 and Table 3 on pages 29 and 30, maximum unmitigated regional construction emissions would not exceed the SCAQMD regional significance thresholds for VOC, NO_X, CO, SO_X, PM_{10}, or $PM_{2.5}$. Thus, the Project's potential impacts associated with regional construction emissions would be less than significant, and no mitigation measures are required.

Localized Impacts

The localized effects from on-site daily emissions were evaluated at sensitive receptor locations that could potentially be impacted by the Project according to SCAQMD's localized significance thresholds (LST) methodology, which uses on-site mass emissions rate lookup tables and Project-specific modeling, where appropriate.[23] SCAQMD provides LSTs applicable to the following criteria pollutants: NO_X, CO, PM_{10}, or $PM_{2.5}$. SCAQMD does not provide an LST for SO_2 as it is not considered a pollutant of concern from construction and operational activities of land use development projects.[24] Since VOCs are not a criteria pollutant, there is no ambient standard or SCAQMD LST for VOCs. Due to the role VOCs play in O_3 formation, it is classified as a precursor pollutant, and only a regional emissions threshold has been established. [25]

LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standards and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor.[26] The mass rate look-up tables were developed for each source receptor area and can be used to determine whether or not a project may generate significant adverse localized air quality impacts.[27] SCAQMD provides LST mass rate look-up tables for projects with active construction areas that are less than or equal to 5 acres.[28]

Estimates of maximum construction-related localized (on-site) daily emissions for NO_X, CO, PM_{10}, or $PM_{2.5}$ are presented in Table 2 and Table 3. Based on the construction site acreage and distance to the closest off-site sensitive receptors, localized construction emissions thresholds were obtained from the LST look-up tables and are also listed in Table 2 and Table 3. With respect to air quality, there is one sensitive receptor in the vicinity of the Project Site (Metropolitan High School). However, there is one related project with residential uses located at 1024 South Mateo Street approximately 635 feet (195 meters) east of the Project Site. This related project could potentially be operational during proposed construction activities and, therefore, were considered hypothetically as sensitive receptors. A 195-meter receptor distance was used to evaluate impacts at these receptors.[29] As presented in Table 2 and Table 3, construction-related daily maximum localized emissions would not exceed the SCAQMD daily significance thresholds for NO_X, CO, PM_{10}, or $PM_{2.5}$. Therefore, localized construction emissions resulting from the Project would result in less than significant short-term impacts, and no mitigation measures are required.

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23 SCAQMD, LST Methodology Appendix C—Mass Rate LST Look-Up Table, October 2009.

24 SCAQMD, Final LST Methodology, July 2008.

25 SCAQMD, Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, May 2005.

26 SCAQMD, Final Localized Significance Threshold Methodology, June 2003, Revised July 2008.

27 SCAQMD, Final Localized Significance Threshold Methodology, June 2003, Revised July 2008.

28 SCAQMD, Appendix C—Mass Rate LST Look-up Tables.

29 SCAQMD LST thresholds are given at 25, 50, 100, 200 and 500-meter increments.

Operation

To determine if a significant air quality impact would occur, the net increase in regional operational emissions generated by the Project was compared against SCAQMD's significance thresholds.[30] SCAQMD has established separate significance thresholds to evaluate potential impacts due to the incremental increase in criteria air pollutants associated with long-term operations. Regional operational emissions for the Project were calculated using CalEEMod. Inputs into the CalEEMod model include Project-related vehicle trips, as well as land uses and square footage to determine energy and water usage and waste generation. Mobile-source emissions were calculated within CalEEMod based on data from the VMT analysis included in the Transportation Assessment, Appendix IS-12.1 of this IS/MND. The VMT analysis is based on the LADOT VMT Calculator methodology and contains trip generation and daily VMT for the Project. In addition, the proposed land uses would result in an increase in emissions generated by area sources (e.g., landscape fuel combustion, consumer products, and architectural coatings).

Regional Impacts

Operational air quality impacts are assessed based on the Project's incremental increase in emissions. Therefore, calculation of the Project's operational emissions is the difference in emissions from Buildout land uses and Existing land uses for the Buildout year (2026). The results of the modeled emissions calculations are provided in Table 4 and Table 5 on pages 31 and 32. CalEEMod model output files are provided in Appendix IS-1 of this IS/MND. As indicated therein, the Project would result in an increase in criteria pollutant (VOC, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$.) emissions which would fall below the SCAQMD daily significance thresholds for long-term regional emissions. Therefore, the Project's potential impacts associated with regional operational emissions would be less than significant, and no mitigation measures are required.

Localized Impacts

Operation of the Project would not introduce any major new sources of air pollution within the Project Site. Localized emissions estimates for criteria air pollutants from the Project's on-site sources are presented in Table 4. The SCAQMD LST mass rate look-up tables were used to evaluate potential localized impacts. As shown in Table 4, on-site localized operational emissions would not exceed any of the LSTs for NO_X, CO, PM_{10}, or $PM_{2.5}$.

With regard to off-site localized impacts, land use development projects may increase traffic in the nearby vicinity resulting in an increase in mobile source emissions. The primary pollutant of concern with regard to Project-related off-site mobile emissions is CO. It has long been recognized that CO exceedances are caused by vehicular emissions,[31] primarily when idling at intersections.[32,33] Accordingly, vehicle emissions standards have become increasingly more stringent. Before the first vehicle emission regulations, cars in

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30 SCAQMD, SCAQMD Air Quality Significance Thresholds, revised March 2015. SCAQMD based these thresholds, in part, on the federal Clean Air Act and, to enable defining "significant" for CEQA purposes, defined the setting as the South Coast Air Basin. (See SCAQMD, *CEQA Air Quality Handbook*, April 1993, pp. 6-1–6-2.)

31 USEPA, 2000, Air Quality Criteria for Carbon Monoxide, EPA 600/P-099/001F.

32 SCAQMD, CEQA Air Quality Handbook, 1993, Section 4.5.

33 SCAQMD, Air Quality Management Plan, 2003.

the 1950s were typically emitting about 87 grams of CO per mile.[34] Currently, the CO standard in California is a maximum of 3.4 grams/mile for passenger cars (with provisions for certain cars to emit even less).[35] With the turnover of older vehicles, introduction of cleaner fuels and implementation of control technology on industrial facilities, CO concentrations in the Air Basin have steadily declined.

The analysis prepared for CO attainment in the Basin by the SCAQMD was used to assist in evaluating the potential for the Project to create CO exceedances in the Air Basin. CO attainment was thoroughly analyzed as part of the SCAQMD's 2003 Air Quality Management Plan (2003 AQMP) and the 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan).[36,37] As discussed in the 1992 CO Plan, peak carbon monoxide concentrations in the Air Basin are due to unusual meteorological and topographical conditions, and not due to the impact of particular intersections. Considering the region's unique meteorological conditions and the increasingly stringent CO emissions standards, CO modeling was performed as part of the 1992 CO Plan and subsequent plan updates and air quality management plans.

In the 1992 CO Plan, a CO hot spot analysis was conducted for four busy intersections in Los Angeles at the peak morning and afternoon time periods. The intersections evaluated included: Long Beach Boulevard and Imperial Highway (Lynwood); Wilshire Boulevard and Veteran Avenue (Westwood); Sunset Boulevard and Highland Avenue (Hollywood); and La Cienega Boulevard and Century Boulevard (Inglewood). These analyses did not predict a violation of CO standards. The busiest intersection evaluated was that at Wilshire Boulevard and Veteran Avenue, which had a daily traffic volume of approximately 100,000 vehicles per day. As part of the 2003 AQMP CO Modeling Attainment Demonstration, an updated analysis was performed based on the 1992 CO Plan using more recent modeling techniques (dispersion modeling, emission factors).[38] The 2003 AQMP CO Modeling and Attainment Demonstration estimated that the 1-hour concentration for this intersection was 4.6 ppm, which indicates that the most stringent 1-hour CO standard (20.0 ppm) would likely not be exceeded until the daily traffic at the intersection exceeded more than 400,000 vehicles per day. As an initial screening step, if a project intersection does not exceed 400,000 vehicles per day, then the project does not need to prepare a detailed CO hot spot analysis.

At buildout of the Project, the highest average daily trips at an intersection in the vicinity of the Project Site would be approximately 73,000 trips at the 7th Street and Santa Fe Avenue intersection,[39] which is significantly below the daily traffic volumes that would be expected to generate CO exceedances as evaluated in the 2003 AQMP.[40] This daily trip estimate is based on the peak hour conditions of the

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34 USEPA, Timeline of Major Accomplishments in Transportation, Air Pollution, and Climate Change, www.epa.gov/air-pollution-transportation/timeline-major-accomplishments-transportation-air-pollution-and-climate, accessed April 12, 2023.

35 CARB, California Exhaust Emission Standards and Test Procedures for 2001 and Subsequent Model Passenger Cars, Light-duty Trucks, and Medium-duty Vehicles, amended September 27, 2010.

36 SCAQMD, Air Quality Management Plan, Appendix V, Modeling and Attainment Demonstrations, August 2003.

37 SCAQMD, Federal Attainment Plan for Carbon Monoxide, 1992.

38 SCAQMD, Air Quality Management Plan, Appendix V, Modeling and Attainment Demonstrations, August 2003.

39 Gibson Transportation Consulting, Transportation Assessment for the 1811 Sacramento Project, City of Los Angeles, May 2023.

40 The 2003 AQMP estimated that the 1-hour concentration for this intersection was 4.6 ppm, which indicates that the most stringent 1-hour CO standard (20.0 ppm) would likely not be exceeded until the daily traffic at the intersection exceeded more than 400,000 vehicles per day.

intersection and includes both Project and background vehicle trips. There is no reason unique to the Basin meteorology to conclude that the CO concentrations at this intersection would exceed the 1-hour CO standard if modeled in detail, based on the studies undertaken for the 2003 AQMP.[41] Therefore, the Project does not trigger the need for a detailed CO hotspot analysis and would not cause any new or exacerbate any existing CO hotspots. As a result, the Project's potential impacts related to localized mobile-source CO emissions are considered less than significant. The supporting data for this analysis is included in Appendix IS-1 of this IS/MND.

Based on the above, the Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is non-attainment under an applicable federal or state ambient air quality standard. Impacts would be less than significant, and no mitigation measures are required.

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. Certain population groups are especially sensitive to air pollution and should be given special consideration when evaluating potential air quality impacts. These population groups include children, the elderly, persons with pre-existing respiratory or cardiovascular illness, and athletes or others who engage in frequent exercise. As defined in the SCAQMD CEQA Air Quality Handbook, a sensitive receptor to air quality is defined as any of the following land use categories: (1) long-term health care facilities; (2) rehabilitation centers; (3) convalescent centers; (4) retirement homes; (5) residences; (6) schools (i.e., elementary, middle, and high schools); (7) parks and playgrounds; (8) child care centers; and (9) athletic fields. As discussed above, the nearest sensitive receptor with respect to air quality is the Metropolitan High School located approximately 950 feet (290 meters) north of the Project Site. However, there is one related project with residential uses located at 1024 South Mateo Street approximately 640 feet (195 meters) east of the Project Site. This related project could potentially be operational during proposed construction activities and, therefore, were considered hypothetically as sensitive receptors.

As discussed above, construction and operation of the Project would result in less than significant impacts relative to both regional and localized air pollution emissions. Therefore, the Project would not expose sensitive receptors to substantial pollutant concentrations. In addition, Project construction activities would comply with SCAQMD Rule 403 regarding the control of fugitive dust and other specified dust control measures. As such, impacts to off-site sensitive receptors would be less than significant, and no mitigation measures are required.

When considering potential air quality impacts under CEQA, consideration is given to the location of sensitive receptors within close proximity of land uses that emit toxic air contaminants (TACs). The California Air Resources Board (CARB) has published and adopted the Air Quality and Land Use Handbook: A Community Health Perspective (2005), which provides recommendations regarding the siting of new sensitive land uses near potential sources of air toxic emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing

[41] It should be noted that CO background concentrations within the vicinity of the modeled intersection have substantially decreased since preparation of the 2003 AQMP. In 2003, the 1-hour background CO concentration was 5 ppm and has decreased to 2 ppm in 2014.

facilities).[42] SCAQMD adopted similar recommendations in its Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning (2005).[43] Together the CARB and SCAQMD guidelines recommend siting distances for both the development of sensitive land uses in proximity to TAC sources and the addition of new TAC sources in proximity to existing sensitive land uses. The Project would not include any substantial sources of TAC emissions such as generators, boilers or any other combustion sources. In addition, if the Project were to install stationary equipment with the potential to emit TACs, this equipment would be subject to SCAQMD permitting requirements which will identify health risk to nearby sensitive receptors. As the Project would not contain substantial sources of TAC emissions and is consistent with the CARB and SCAQMD guidelines, the Project would not result in the exposure of off-site sensitive receptors to carcinogenic or toxic air contaminants that exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0, and potential TAC impacts would be less than significant.

The SCAQMD recommends Health Risk Assessments (HRAs) for substantial sources of diesel particulate matter such as warehouse distribution and cold storage facilities. No such facilities are located on the Project Site, and the Project does not propose any such uses. As such, a HRA was not required for the Project.

Based on the above, the Project would not expose sensitive receptors to substantial pollutant concentrations. Impacts would be less than significant, and no mitigation measures are required.

d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact. No other emissions, including 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.[44] The Project would not involve these types of uses as the Project would include the development of commercial uses. On-site trash receptacles would also 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 Rules 401, 402, and 403, regarding visible emissions violations.[45] In particular, Rule 402 provides that a person shall not discharge

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42 California Air Resources Board, Air Quality and Land Use Handbook: A Community Health Perspective, April 2005.

43 SCAQMD, Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, May 2005.

44 SCAQMD, CEQA Air Quality Handbook, April 1993.

45 SCAQMD, Visible Emissions, Public Nuisance, & Fugitive Dust, www.aqmd.gov/home/regulations/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust, accessed April 12, 2023.

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.[46]

Based on the above, the Project would not result in other emissions affecting a substantial number of people. The Project's potential impacts would be less than significant, and no mitigation measures are required.

IV. BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☒	☐
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

[46] SCAQMD, Rule 402, Nuisance.

a. Would the project 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 occupied by three warehouse structures. As described in Section 2, Project Description, of this IS/MND, the Project Site is relatively flat with limited ornamental landscaping. According to the Tree Inventory Report included as Appendix IS-2 of this IS/MND, a total of five trees were inventoried, including three on-site trees and two street trees. Due to the urbanized and disturbed nature of the Project Site and the surrounding areas, along with the lack of large expanses of open space areas within and in the vicinity of the Project Site, species likely to occur on-site are limited to small terrestrial and avian species typically found in urbanized developed settings. Based on the lack of habitat on the Project Site, it is unlikely any special status species listed by the California Department of Fish and Wildlife (CDFW) or by the U.S. Fish and Wildlife Service (USFWS) would be present on-site. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area as defined by the City of Los Angeles.[47] 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 regulations by the CDFW or USFWS. Impacts would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. The Project Site is located in an urbanized area and is currently occupied by three warehouse structures and associated surface parking. No riparian or other sensitive natural community exists on the Project Site or in the immediate surrounding area.[48,49] Furthermore, the Project Site and surroundings are not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City of Los Angeles or County of Los Angeles.[50,51] There are no other sensitive natural communities identified by the CDFW or the USFWS.[52,53] Additionally, although the Project Site is in proximity to the Los Angeles River, development of the Project would not have an adverse effect on any riparian habitat in the Los Angeles River since the Project would not encroach into

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47 City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, Figure BR-1C—Biological Resources Areas (Central Geographical Area), January 19, 1995, p. 2-18-5.

48 City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5166-030-008; -009, http://zimas.lacity.org/, accessed November 16, 2023.

49 United States Fish and Wildlife Service, National Wetlands Inventory, www.fws.gov/wetlands/data/Mapper.html, accessed November 16, 2023.

50 City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, Figure BR-1C—Biological Resources Areas (Central Geographical Area), January 19, 1995, p. 2-18-5.

51 County of Los Angeles, Department of Regional Planning, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, February 2015.

52 California Department of Fish and Wildlife, Biogeographic Information and Observation System (BIOS), Hollywood Quad Species List, https://apps.wildlife.ca.gov/bios/, accessed November 16, 2023.

53 California Department of Fish and Wildlife, CDFW Lands, https://apps.wildlife.ca.gov/lands/, accessed November 16, 2023.

the Los Angeles River. Also, the portion of the Los Angeles River near the Project Site is concrete lined and the primary areas of the river that presently support riparian habitat are the Sepulveda Basin (approximately 22.7 miles northwest of the Project area) and the Glendale Narrows (approximately 7.7 miles north of the Project Site).[54] Therefore, the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community. Impacts would be less than significant, and no mitigation measures are required.

c. Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Less Than Significant Impact. As discussed above, the Project Site is located in an urbanized area and is currently occupied by three warehouse structures. In addition, the surrounding area has been fully developed, and the Los Angeles River located further east of the Project Site is concrete lined. No water bodies or state and federally protected wetlands exist on the Project Site.[55] As such, the Project would not have an adverse effect on state or federally protected wetlands. Impacts would be less than significant, and no mitigation measures are required.

d. Would the project 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 occupied by three warehouse structures. In addition, the areas surrounding the Project Site are fully developed and there are no large expanses of open space areas within or surrounding the Project Site that provide linkages to natural open spaces areas which may serve as wildlife corridors. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City of Los Angeles or County of Los Angeles.[56,57]

According to the Tree Inventory Report included as Appendix IS-2 of this IS/MND, a total of five trees were inventoried, including three on-site trees and two street trees, all of which would be removed as part of the Project. Although unlikely, these trees could potentially provide nesting sites for migratory birds. However, the Project would comply with the Migratory Bird Treaty Act (MBTA), which prohibits the take, possession, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid permit issued pursuant to federal regulations. The Project would further comply with the MBTA regulations by conducting tree or vegetation removal activities outside of the nesting season (February 1–August 31), to the extent feasible, and, if tree or vegetation removal activities occur during the nesting season, the

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54 City of Los Angeles, Los Angeles River Revitalization, Ecosystem, http://lariver.org/ecosystem, accessed November 16, 2023.

55 United States Fish and Wildlife Service, National Wetlands Inventory, www.fws.gov/wetlands/data/Mapper.html, accessed November 16, 2023.

56 City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, Figure BR-1C—Biological Resources Areas (Central Geographical Area), January 19, 1995, p. 2-18-5.

57 County of Los Angeles, Department of Regional Planning, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, February 2015.

Applicant would retain a biological monitor during the removal activities to ensure that no active nests would be impacted. If active nests are found, a buffer would be established until the fledglings have left the nest. The size of the buffer area varies with species and local circumstances (e.g., presence of busy roads) and is based on the professional judgement of the monitoring biologist, in coordination with the CDFW, as appropriate. Additionally, the Project would comply with California Fish and Game Code Section 3503 which states that "[i]t is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto." In addition, pursuant to the requirements of the City's Urban Forestry Division and subject to approval of the Board of Public Works, the onsite trees to be removed would be replaced at a 1:1 ratio, and the street trees to be removed would be replaced at a 2:1 basis. The Project would remove the on-site trees and would be replaced with 12 new on-site trees including Golden Medallion trees and Fruitless Olive trees. In addition, the existing street trees would be replaced with 12 new street trees including Engleman Oak trees and Hong Kong Orchid trees.

Overall, in compliance with the MBTA, California Fish and Game Code Section 3503, and standard construction processes during nesting season, and replacement of street trees in accordance with the Bureau of Street Services, Urban Forestry Division's requirements, the Project would not 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. Impacts would be less than significant, and no mitigation measures are required.

e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?

Less Than Significant Impact. The City of Los Angeles Protected Tree and Shrub Ordinance (Ordinance 186873, LAMC Chapter IV, Article 6) regulates the relocation or removal of all Southern California native oak trees (excluding scrub oak), California black walnut trees, Western sycamore trees, California Bay trees, Mexican Elderberry shrubs, and Toyon shrubs of at least 4 inches in diameter at breast height or 4.5 feet above the ground level at the base of the tree or shrub. These tree and shrub species are defined as "protected" by the City of Los Angeles. Trees or shrubs that have been planted as part of a tree planting program are exempt from the City's Protected Tree and Shrub Ordinance and are not considered protected. The City's Protected Tree and Shrub Ordinance prohibits, without a permit, the removal of any regulated protected tree, including "acts that inflict damage upon root system or other parts of the tree or shrub…" The protected tree or shrub must be replaced within the property by at least four specimens of a protected variety, except where the protected species is relocated pursuant to the LAMC. In addition, a protected tree shall only be replaced by other protected tree varieties and shall not be replaced by shrubs. A protected shrub shall only be replaced by other protected shrub varieties and shall not be replaced by trees, to the extent feasible as determined by the Advisory Agency, Board of Public Works, or a licensed or certified arborist.

According to the Tree Inventory Report included as Appendix IS-2 of this IS/MND, a total of five trees were inventoried, including three on-site trees and two street trees. Street trees and trees within the Project Site consist of various non-native species, including Lemon Bottlebrush and Canary Island Pine. The Project would remove the three existing on-site trees and two street trees, none of which are

protected trees under the City's Protected Tree and Shrubs Ordinance No. 186,873.[58] Pursuant to the requirements of the City's Urban Forestry Division and subject to approval of the Board of Public Works, the onsite trees to be removed would be replaced at a 1:1 ratio, and the street trees to be removed would be replaced at a 2:1 basis. The Project would replace the on-site trees with approximately 12 new trees inclusive of Golden Medallion trees and Fruitless Olive trees. In addition, the existing street trees would be replaced with 12 new street trees inclusive of Engleman Oak trees and Hong Kong Orchid trees. 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.

f. Would the project 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. As described above, the Project Site is located in an urbanized area and is currently occupied by three warehouse structures and associated surface parking. No Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site.[59] Thus, the Project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other related plans. No impacts would occur, and no mitigation measures are required.

V. CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☐	☐	☒	☐
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☒	☐	☐
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

[58] Pursuant to the Ordinance No. 186,873 and as defined in LAMC Section 17.02, a protected tree or shrub includes any of the following Southern California indigenous tree species, which measure four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree, or any of the following Southern California indigenous shrub species, which measure four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the shrub: Oak tree; Southern California Black Walnut tree; Western Sycamore tree; California Bay tree; Mexican Elderberry shrub; and Toyon shrub.

[59] California Department of Fish and Wildlife, California Natural Community Conservation Plans, April 2019.

The following analysis is based on the Historical Resources Technical Report prepared for the Project by Stantec Consulting Services, Inc., dated April 3, 2023. The Historical Resources Technical Report is included as Appendix IS-3 of this IS/MND.

Less Than Significant Impact. Section 15064.5 of the CEQA Guidelines generally defines a historical 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 PRC Section 5020.1(k)); or (3) identified as significant in an historical resources survey (meeting the criteria in PRC Section 5024.1(g)). 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 a 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. The local register of historical resources is managed by the Los Angeles Office of Historic Resources, which operates SurveyLA, a comprehensive program to identify significant historical resources throughout the City.

As described in the Historical Resources Technical Report (HRTR), 1811 Sacramento Street and 1825 Sacramento Street were evaluated for their eligibility for listing in the National Register of Historical Places (NRHP), California Register of Historic Resources (CRHR) and for designation as a Historic Cultural Monument (HCM). The report concluded that the Project Site is not eligible for listing and does not appear to be significant under Criteria A/1/1, Criteria B/2/2, Criteria C/3/3, and Criteria D/4. As the Project Site is not significant under any national, state, or local criteria, it has no period of significance, and its physical and historical integrity requires no further examination. Therefore, the existing structures on the Project Site do not meet the criteria for listing in the NRHP and the CRHR or for designation as a Los Angeles HCM, and does not meet the definition of a historical resource pursuant to Section 15064.5 of the CEQA Guidelines. As such, the Project would have no direct impact on historical resources.

As discussed in the HRTR, the Pioneer Truck & Transfer Building, was identified as a historical resource, and is located to the northeast of the Project Site at 1910 Bay Street, was identified by SurveyLA as individually eligible for listing in the National Register of Historic Places (NRHP) and the CRHR and for local designation as an excellent intact example of a 1920s warehouse building in Los Angeles' primary industrial district. The period of significance was identified as 1929, the building's date of construction.

According to National Register Bulletin 15, there are seven aspects of integrity: location, setting, design, materials, workmanship, feeling, and association. Six of the seven aspects of integrity are related to the historical significance and justify its inclusion in, or eligibility for, applicable landmark designation programs. As the Project would not alter the physical characteristics of the Pioneer Truck & Transfer Building, the only relevant aspect with respect to the impact of the new building on this historical resource is setting. Setting refers to the character of the place in which the historical resource is situated within the boundaries of the property or historic district. It also refers to a resource's relationship to its broader surroundings, such as other buildings, landscapes, and open spaces. The Pioneer & Truck Transfer Building is separated from the Project Site by Wilson Street; and therefore, the Project would not impact the Pioneer & Truck Transfer Building's integrity of immediate setting because the Project Site is outside

the parcel boundaries of the historical resource. The Project would not have any impact on the physical characteristics that convey the historical resource's historic significance and justify its inclusion in landmark designation programs.

The Project would introduce a new visual element to the southwest of the Pioneer Truck & Transfer Building. However, the historical resource's broader surroundings, particularly its relationship to the surrounding buildings, has already been altered by demolition and new construction. Aside from the Project Site, 14 of the 17 buildings included in the vicinity of the historic resource had already been constructed after the period of significance of 1929 for the Pioneer & Truck Transfer Building. Therefore, the overall integrity of the setting has already been substantially diminished by construction in the vicinity. Furthermore, the broad setting of the Pioneer & Truck Transfer Building is not a key aspect of integrity for the historical resource because neither its historical nor architectural significance is derived from its surrounding environment.

Views of the Pioneer & Truck Transfer Building from the surrounding blocks would not be obscured as a result of the Project. The most important views of this historical resource are of its street-facing facades on Wilson Street and Bay Street. The Project would have no impact on these prominent street-facing facades, and the historical resource would remain fully visible and continue to be a prominent component in the area. Therefore, while the Project would introduce a new visual element to the vicinity of the Pioneer Truck & Transfer Building, it would not impact the historical resource's integrity of setting to the degree that it would no longer be eligible for national, state, or local historic district programs. As such, the Project would not result in indirect impacts on nearby historic resources. Impacts would be less than significant, and no mitigation measures are required.

b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines §15064.5?

The following analysis is based on the *Archaeological Resource Assessment* for the Project prepared by SWCA Environmental Consultants dated February 17, 2023, and is included as Appendix IS-4 of this IS/MND.

Less Than Significant Impact With Mitigation Incorporated. CEQA Guidelines Section 15064.5(a)(3)(D) 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 an urbanized area of the City and has been subject to grading, excavation and fill activities, and development in the past. Based on a records search conducted by the South Central Coastal Information Center (SCCIC) for the Project Site, as referenced in Appendix IS-4 of this IS/MND, no archeological resources were identified within the Project Site. Specifically, results of the CHRIS records search from the SCCIC conducted on November 14, 2022, indicate that 32 cultural resource studies have been conducted within 0.5 mile of the Project Site, none of which intersect the Project Site. Further, on November 17, 2022, the NAHC submitted the results of an SLF search. The results of the SLF search were negative. In the response letter, the NAHC noted that the lack of recorded sites does not indicate the absence of resources within the Project Site and that the CHRIS and SLF are not exhaustive. However, as discussed in the Archaeological Resources Assessment, given the intensive modifications to the surface and subsurface within the Project Site, SWCA concluded that the Project Site

has a low sensitivity for containing archaeological resources affiliated with Native Americans. Further discussion of impacts to tribal cultural resources is included under Section XVII, Tribal Cultural Resources.

SWCA's research focused on assessing historic period land uses through a review of available archival sources that include various types of written records, photographs, and maps. As discussed therein, since the 1770s, a canal known as the Zanja Madre had been diverting water from the Los Angeles River to the camp that would become the Pueblo of Los Angeles. As Los Angeles grew, new zanjas needed to be built to irrigate increasingly more farmlands. In 1857, the first offshoot was completed – Zanja No. 1, which ran between Alameda Street and the Los Angeles River. By 1870, there were a total of eight zanjas covering approximately 50 miles that connected to the Zanja Madre. At this early time, the zanjas were little more than earthen ditches; none were covered or lined, allowing residents to easily access water. Though the zanjas were a crucial water supply in early Los Angeles, they also served as waste disposal and sewer system for early residents. Over time, property owners began requesting that zanjas be abandoned, because the unused structures now served as impediments to development, and fertile land that once held rows of orchards and vines was now far more valuable for homes. By 1904, all the zanjas had been abandoned; most were filled in, but some continued to be used as sewers. During SWCA's research, irrigation channels were located in the vicinity of the Project Site and consisted of Zanja No. 1 (east of the Project Site), Zanja No. 2 (west of the Project Site), and a connecting irrigation channel between Zanja No. 1 and Zanja No. 2 that transects the northern portion of the Project Site. Residential dwellings were present within the Project Site by 1906, and by 1921 these dwellings were subsequently replaced by a commercial building. In addition, as described in the Geotechnical Investigation included as Appendix IS-6, brick fragments were observed in the artificial fill down to 7 feet below ground surface. Based on the above considerations, SWCA considers the Project Site to have moderate sensitivity for encountering historic period Non-Native American archaeological resources within the Project Site. To the extent that the proposed ground disturbance extends into undisturbed soils buried beneath previously disturbed sediment, there may be some potential for preservation of resources in alluvial sediments.

Therefore, while no known archaeological resources have been recorded within the Project Site, there is moderate sensitivity for unidentified historic-period archaeological resources, as they cannot be ruled out as potentially being present at subsurface levels within the Project Site. As such, the Project shall incorporate Mitigation Measures CUL-MM-1 through CUL-MM-4. With the implementation of Mitigation Measures CUL-MM-1 through CUL-MM-4, Project impacts associated with unanticipated archaeological resources would be less than significant.

Mitigation Measure CUL-MM-1: Prior to the issuance of building permits, the Project proponent shall retain a qualified archaeologist, defined as an archaeologist who meets the Secretary of Interior's Standards for professional archaeology, during the excavation phase to carry out and ensure proper implementation of the mitigation measures related to archaeological resources. The qualified archaeologist shall submit a letter of retention to the Project proponent no fewer than 15 days before demolition or excavation activities commence. The letter shall include a resume for the qualified archaeologist that demonstrates fulfillment of the Secretary of Interior's Standards.

Mitigation Measure CUL-MM-2: Prior to the commencement of demolition and excavation, an Archaeological Resources Monitoring and Mitigation Plan (ARMMP) shall be prepared. The ARMMP shall include, but not be limited to, a construction worker

training program (described in MM Arch-3), monitoring protocol for demolition and excavation activities discovery and processing protocol for inadvertent discoveries of archaeological resources, and identification of a curation facility should artifacts be collected. The ARMMP shall identify areas that require monitoring, provide a framework for assessing the geoarchaeological setting to determine whether sediments capable of preserving archaeological remains are present, and include a protocol for identifying the conditions under which additional or reduced levels of monitoring (e.g., spot-checking) may be appropriate. The duration and timing of the monitoring shall be determined based on the rate of excavation, geoarchaeological assessment, and, if present, the quantity, type, and spatial distribution of archaeological resources identified.

The ARMMP shall minimally include a historical context statement, research design, and methodology by which any newly identified archaeological sites will be evaluated for CRHR eligibility and as unique archaeological resources. The ARMMP will specify the specific types of archaeological sites likely to be encountered, as well as the means by which significance will be assessed. If any archaeological resources are identified and are found not to be significant or do not retain integrity, then they will be recorded to a level sufficient to document the contents and condition. The ARMMP shall include a proactive identification and documentation protocol that would facilitate preservation or mitigation of impacts to any archaeological sites identified in a cost-effective manner. The ARMMP will include potential treatment plans to be implemented in the event that a newly discovered archaeological resource is determined by the qualified archaeologist to constitute a “historical resource” pursuant to CEQA Guidelines Section 15064.5(a) or a “unique archaeological resource” pursuant to PRC 21083.2(g). The ARMMP will require that, if the treatment plans outlined therein are found to be infeasible or other alternatives are proposed, the qualified archaeologist shall coordinate with the Project proponent and County Planning to amend the ARMMP with a formal treatment plan that would reduce impacts to the resource(s). The treatment plans stated in the ARMMP or prepared after the discovery of a historical resource, shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and PRC Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment, and if it is determined that avoidance is not feasible, appropriate treatment will be developed based on the type of resource and the results of the significance evaluation, which may include data recovery.

The ARMMP shall summarize the requirements for tribal coordination in the event of an inadvertent discovery of Native American archaeological resources, including the applicable regulatory compliance measures, conditions of approval, or mitigation measures established for the inadvertent discovery of tribal cultural resources to be carried out in concert. The ARMMP shall be prepared in compliance with PRC Section 5024.1, Title 14 California Code of Regulations, Section 15064.5 of the CEQA Guidelines, and PRC Sections 21083.2 and 21084.1.

Mitigation Measure CUL-MM-3: Before the commencement of initial demolition or excavation at the Project Site, the retained qualified archaeologist or their designee shall provide a Worker Environmental Awareness Program (WEAP) training to on-site Project personnel responsible for supervising demolition and excavation (i.e., foreman or supervisor) and machine operators. The WEAP training shall brief construction crews regarding the regulatory compliance requirement and applicable mitigation measures that must be adhered to during demolition and excavation activities for the protection of archaeological resources. As an element of the WEAP training,

the qualified archaeologist or their designee shall advise the construction crew on proper procedures to follow if an unanticipated archaeological resource is discovered during construction. The qualified archaeologist or their designee shall also provide the construction workers with contact information for the qualified archaeologist and their designee(s) and protocols to follow if inadvertent discoveries are made. In addition, workers shall be shown examples of the types of archaeological resources that would require notification of the archaeologist, if encountered. Once the ground disturbances have commenced, the need for additional or supplemental WEAP training shall be determined through consultation with the qualified archaeologist, Project proponent, or their designated supervisor. Within five days of completing a WEAP training, a list of those in attendance shall be provided by the qualified archaeologist to the Project proponent.

Mitigation Measure CUL-MM-4: Before the commencement of demolition or excavation activities, an archaeological monitor shall be present during ground disturbing activities as stipulated in the ARMMP. The qualified archaeologist may designate an archaeologist to conduct the monitoring under their direction. The monitor shall have the authority to temporarily halt or redirect construction activities in soils that are likely to contain potentially significant archaeological resources, as determined by the qualified archaeologist. The monitor shall complete a daily log documenting construction activities and observations. The field observations shall include assessment of the geoarchaeological setting and whether sediments are identified that are no longer capable or unlikely to contain archaeological material (i.e., sterile), which may be encountered prior to reaching the total depth of excavation expected for the Project. If initial archaeological monitoring identifies low archaeological sensitivity (i.e., sterile soil strata) below a certain depth or within a certain portion of the Project Site, a corresponding reduction of monitoring coverage would be appropriate. In the event that potentially significant archaeological resources are exposed during construction, work in the immediate vicinity of the find (within 25 feet) shall stop until a qualified archaeologist can evaluate the significance of the find. Construction activities may continue in other areas in coordination with the qualified archaeologist. If the discovery is determined by the qualified archaeologist to constitute a “historical resource” pursuant to CEQA Guidelines Section 15064.5(a) or a “unique archaeological resource” pursuant to PRC 21083.2(g), and the treatments proposed in the ARMMP are found to be infeasible or other alternatives are proposed, the qualified archaeologist shall coordinate with the Project proponent and County Planning to amend the ARMMP with a formal treatment plan that would reduce impacts to the resource(s). The treatment plan established for the resource(s) shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and PRC Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment, and if it is determined that avoidance is not feasible, treatment may include architectural documentation and archaeological data recovery (i.e., excavation, laboratory processing and analysis) to remove the resource(s) and reduce potential impacts to less than significant.

c. Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant Impact. The Project Site is located in an urbanized area and has been subject to previous grading and development. In addition, as discussed in Section 2, Project Description, of this

IS/MND, the Project would require limited excavation, which would extend to a depth of approximately 11 feet. If human remains were discovered during construction of the Project, work in the immediate vicinity of the construction area would be halted, the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5. In addition, disposition of the human remains and any associated grave goods would occur in accordance with PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e), which requires that work stop near the find until a coroner can determine that no investigation into the cause of death is required and if the remains are Native American. Specifically, in accordance with CEQA Guidelines Section 15064.5(e), if the coroner determined the remains to be Native American, the coroner shall contact the Native American Heritage Commission who shall identify the person or persons it believes to be most likely descended from the deceased Native American. The most likely descendent may make recommendations regarding the treatment of the remains and any associated grave goods in accordance with PRC Section 5097.98. Therefore, due to the low potential that any human remains are located on the Project Site, and because compliance with the regulatory standards described above would ensure appropriate treatment of any potential human remains unexpectedly encountered during grading and excavation activities, the Project's impact related to human remains would be less than significant, and no mitigation measures are required.

VI. ENERGY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

a. Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less Than Significant Impact. In order to determine if the Project would result in a potentially significant environmental impact due to the wasteful, inefficient, or unnecessary consumption of energy resources during the construction or operation of the Project, an analysis of the Project's energy use for all stages of the Project has been provided. Section 15126.2(b) of the CEQA Guidelines refers to Appendix F of the CEQA Guidelines as guidance for the information to be provided in the analysis. Appendix F provides the following topics that the lead agency may consider in the discussion of energy use in an EIR, where such topics are applicable or relevant to the project:

- The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed;

- The effects of the project on local and regional energy supplies and on requirements for additional capacity;
- The effects of the project on peak and base period demands for electricity and other forms of energy;
- The degree to which the project complies with existing energy standards;
- The effects of the project on energy resources; and/or
- The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

In accordance with the considerations above, the following analysis evaluates the potential energy impacts of the Project with a particular emphasis on whether the Project would result in the inefficient, wasteful, or unnecessary consumption of energy. The supporting energy calculations are included in Appendix IS-5 of this IS/MND.

Construction

During construction of the Project, energy would be consumed in the form of electricity associated with the conveyance of water used for dust control and, on a limited basis, powering lights, electronic equipment, or other construction activities necessitating electrical power. Construction activities, including the construction of the Project, typically do not involve the consumption of natural gas. Project construction would also consume energy in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment on the Project Site, construction worker travel to and from the Project Site, and delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities).

As shown in Table 6 on page 51, it is estimated that a total of 30,546 kilowatt-hours (kWh) of electricity, 42,046 gallons of gasoline, and 135,486 gallons of diesel fuel would be consumed during Project construction.

Electricity

Electricity would be supplied to the Project Site by LADWP and would be obtained from existing infrastructure serving the Project Site. As shown in Table 6, approximately 30,546 kWh of electricity would be consumed during Project construction. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off to avoid unnecessary energy consumption. Moreover, construction electricity usage would replace the existing electricity usage associated with removal of portions of the existing buildings at the Project Site during construction.[60] In addition, although Title 24 requirements typically apply to energy usage for buildings,

[60] As shown in Appendix IS-5, electricity usage for existing uses would be 314,063 kWh per year which is greater than construction electricity usage of 30,546 kWh. Electricity usage during Project construction would replace some of the electricity usage due to removal of existing uses.

Table 6
Summary of Energy Use During Construction[a]

Fuel Type	Quantity
Electricity	
Water Consumption (Dust Control)[b]	811 kWh
Construction Temporary Power (Lighting, power tools)	23,386 kWh
Electric Equipment	6,350 kWh
Total Electricity	**30,546 kWh**
Gasoline	
On-Road Construction Equipment	42,046 gallons
Off-Road Construction Equipment	0 gallons
Total Gasoline	**42,046 gallons**
Diesel	
On-Road Construction Equipment	86,920 gallons
Off-Road Construction Equipment	48,566 gallons
Total Diesel	**135,486 gallons**

kWh = kilowatt-hour

Note: Numbers may not add up exactly due to rounding.

[a] *Detailed calculations are provided in Appendix IS-5 of this IS/MND. Construction assumptions are contained in Appendix IS-1 of this IS/MND, Construction Schedule and Equipment Requirements, and were obtained from DPR Construction. Construction energy usage conservatively does not account for the offsetting energy usage from decommissioning of existing operational uses during construction. All construction energy usage estimates are considered new energy usage.*

[b] *Energy usage associated with supply and conveyance of water from the source.*

Source: Eyestone Environmental, 2023.

long-term construction lighting (greater than 120 days) providing illumination for the Project Site and staging areas would also comply with applicable Title 24 requirements (includes limits on the wattage allowed per specific area), which would result in the conservation of energy. Therefore, the use of electricity during Project construction would not be wasteful, inefficient, or unnecessary.

Natural Gas

Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support Project construction activities and no demand would be generated by construction.

Transportation Energy

As shown in Table 6, on- and off-road vehicles would consume an estimated 42,046 gallons of gasoline and approximately 135,486 gallons of diesel fuel throughout the Project's construction. The consumption of petroleum-based fuels during construction would be temporary and would cease upon the completion of construction. The consumption of petroleum-based fuels would also vary throughout construction of

the Project as certain phases of construction would require greater use of petroleum-based fuels than other phases of construction. In addition, with regard to trips for hauling demolition material, the City has adopted several plans and regulations to promote the reduction, reuse, recycling, and conversion of solid waste going to disposal systems with which the Project would comply, as discussed in Response to Checklist Questions XIX.d and XIX.e. Furthermore, trucks and equipment used during construction activities would comply with CARB's anti-idling regulations, as well as the In-Use Off-Road Diesel-Fueled Fleets regulation.[61,62] In addition to reducing criteria pollutant emissions, the Project's compliance with the anti-idling and emissions regulations would also result in the efficient use of energy during construction and reduce fuel consumption. On-road vehicles (i.e., haul trucks, worker vehicles) would also be subject to Federal fuel efficiency requirements. In addition, the Project Site provides convenient access to public transit, which provides construction workers with an alternative to passenger vehicles for traveling to and from work. Therefore, the Project's compliance with these regulations and the Project Site's location would reduce the number of construction-related trips and the amount of fuel consumed during construction which, in turn, would reduce the wasteful, inefficient, and unnecessary consumption of energy. Therefore, the use of gasoline and diesel fuel during Project construction would not be wasteful, inefficient, or unnecessary.

Construction Materials

The energy analysis does not include a full life cycle analysis of energy usage that would occur over the production/transport of materials used during Project construction, Project operation, or the end of life for the materials and processes that would occur as an indirect result of the Project. Estimating the energy usage associated with these processes would be too speculative for meaningful consideration, would require analysis beyond the current state-of-the-art in impact assessment, and may lead to a false or misleading level of precision in reporting. Manufacture and transport of materials related to Project construction and operation are expected to be regulated under regulatory energy efficiency requirements. Therefore, it is assumed that energy usage related to construction and operational materials would be consistent with current regulatory requirements regarding energy usage.

Conclusion

Based on the above, construction of the Project would not have a substantial impact on local or regional energy supplies, peak demand for electricity, or energy resources. In addition, construction of the Project would comply with existing applicable energy standards and would not be wasteful, inefficient, or unnecessarily consume energy resources. Thus, Project energy resources impacts during construction would be less than significant, and no mitigation is required.

Operation

During Project operation, energy would be consumed for multiple purposes including, but not limited to, heating/ventilating/air conditioning (HVAC), refrigeration, lighting, electronics, office equipment, and commercial machinery (including kitchen appliances). Energy would also be consumed during Project

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61 CARB, ATCM to Limit Diesel-Fueled Commercial Motor Vehicle Idling, www.arb.ca.gov/regact/idling/idling.htm, accessed April 12, 2023.

62 CARB, In-Use Off Road Diesel-Fueled Fleets Regulation Overview, www.arb.ca.gov/resources/fact-sheets/overview-amendments-use-road-diesel-fueled-fleets-regulation, accessed April 12, 2023.

operation related to water usage, solid waste disposal, and vehicle trips. Operational energy usage is assessed based on the Project's incremental increase in energy usage. Therefore, calculation of the Project's operational energy usage is the difference in energy usage from Buildout land uses and Existing land uses for the Buildout year (2026). Annual energy use has been calculated for buildout of the Project and is shown in Table 7 on page 54. As shown in Table 7, a net total of 7,864,712 kWh of electricity, 277,200 gallons of gasoline, and 45,996 gallons of diesel fuel would be consumed during Project operation. The Project would result in a net reduction of 610,503 cubic feet of natural gas due to removal of existing uses which consume natural gas. Detailed calculations for existing and future Project uses are provided in Appendix IS-5 of this IS/MND.

Electricity

During operation of the Project, there would be a net increase in electricity usage on the Project Site compared to existing conditions due to the additional square footage to be constructed. As shown in Table 7, with buildout of the Project, the on-site electricity demand would increase by approximately 7,864,712 kWh of electricity per year.

The Project would use a mechanical parking lift which would allow for two cars to park in single space. The mechanical parking lift is powered by electricity and would increase the Project's overall electricity consumption. Electricity consumption due to operation of the parking lift is included in the Project's total electricity demand and calculations are provided in Appendix 5 of this Initial Study.

The Project would comply with requirements of the Los Angeles Green Building Code and CALGreen/Title 24 energy efficiency requirements, which were adopted to reduce energy consumption.[63,64] The Project would be subject to the 2022 Title 24 standards. Such measures include enhanced insulation, energy efficient ventilation systems, double paned windows and use of light emitting diode (LED) lighting where appropriate. These standards are designed to, and would, reduce energy, water usage and waste and, thereby, reduce associated energy and help minimize the impact on natural resources and infrastructure. Furthermore, the sustainability features to be incorporated into the Project would include, but not be limited to: high efficiency toilets with a flush volume of 1.28 gallons per flush, or less, high efficiency urinals, showerheads with a flow rate of 1.5 gallons per minute or less, and drip irrigation systems to promote reductions in indoor and outdoor water usage; Energy Star–labeled appliances; and water-efficient landscape design. In addition, the Project would provide domestic water heating systems located in close proximity to point(s) of use and individual metering and billing for water use. Therefore, the use of electricity during Project operations would not be wasteful, inefficient, or unnecessary.

With regard to supply, LADWP forecasts that its total energy sales in the 2026–2027 fiscal year will be 23,807 gigawatt-hours (GWh) of electricity.[65,66] The Project's electricity demand would represent approximately 0.03 percent of LADWP's projected sales in 2026. LADWP has confirmed that the

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63 City of Los Angeles Municipal Code (LAMC), Chapter IX, Article 9.

64 California Building Standards Commission, 2022 California Green Building Standards Code, California Code of Regulations, Title 24, Part 11, effective January 1, 2023.

65 LADWP defines its future electricity supplies in terms of sales that will be realized at the meter.

66 LADWP, 2017 Power Strategic Long-Term Resources Plan, December 2017, Appendix A, Table A-1.

Table 7
Summary of Net Annual Energy Use During Operation[a]

Source	Project with Project Features
Electricity	
Building	6,423,069 kWh
Water	362,685 kWh
EV Charging	118,478 kWh
Mechanical Parking Lift	960,480 kWh
Total Electricity	**7,864,712 kWh**
Natural Gas	**-610,503 cf**
Mobile	
Gasoline	277,200 gallons
Diesel	45,996 gallons
Total Transportation Fuel	**323,196 gallons**

cf = cubic feet

kWh = Kilowatt-hour

[a] *Detailed calculations are provided in Appendix IS-5 of this IS/MND. Energy usage includes the entire Project Site (existing uses to remain + new construction).*

Source: Eyestone Environmental, 2023.

Project's electricity demand can be served by the facilities in the Project area.[67] As discussed above, the Project would also incorporate a variety of energy conservation measures to reduce energy usage. Therefore, it is expected that LADWP's existing and planned electricity capacity and electricity supplies would be sufficient to support the Project's electricity demand. Newly constructed uses are expected to be more efficient than existing uses as new construction would be required to comply with the most recent Title 24 energy efficiency standards. Accordingly, operation of the Project would not result in an increase in demand for electricity that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Therefore, operational impacts to electricity supply and infrastructure capacity would be less than significant, and no mitigation measures are required.

Natural Gas

As shown in Table 7, the Project would result in a net decrease of 610,503 cubic feet of natural gas annually (-1,673 cubic feet per day) in compliance with the City's ordinance No. 187714, adopted on November 29, 2022, which banned natural gas in new construction and is also known as the All-Electric ordinance.[68,69] Although natural gas usage for cooking purposes within restaurants are exempt from the

[67] LADWP, Will Serve, 1811 Sacramento Street, dated January 25, 2023. Refer to Appendix IS-5 of this IS/MND.

[68] Natural gas demand estimate based on estimate provided by the California Emissions Estimator Model (CalEEMod).

[69] City of Los Angeles Ordinance No. 187714. November 29, 2022

City's All-Electric ordinance, the Project would not install natural gas cooking appliances for the proposed restaurant uses. The Project would comply with requirements of the Los Angeles Green Building Code and CALGreen/Title 24 energy efficiency requirements.[70,71] Therefore, the use of natural gas during Project operations would not be wasteful, inefficient, or unnecessary. As such, operation of the Project would not result in an increase in demand for natural gas that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Operational impacts to natural gas supply and infrastructure would be less than significant, and no mitigation measures are required.

Transportation Energy

During operation, the Project would result in the consumption of petroleum-based fuels related to vehicular travel to and from the Project Site. As summarized in Table 7 on page 54, buildout of the Project would consume approximately 277,200 gallons of gasoline and 45,996 gallons of diesel fuel per year, or a total of 323,196 gallons of petroleum-based fuels per year. As shown in Appendix IS-5 of this IS/MND, transportation fuel usage during Project operations would represent approximately 0.0075 percent of gasoline usage and 0.0074 percent of diesel usage within Los Angeles County. As noted above, the Project Site is located in an urbanized area and in close proximity to several bus routes which would provide employees and visitors with various public transportation opportunities. Furthermore, the Project would be consistent with the vehicle miles travelled (VMT) reduction policies included in SCAG's 2020–2045 RTP/SCS. Specifically, consistent with the 2020–2045 RTP/SCS alignment of transportation, land use, and housing strategies, the Project would provide employees and visitors with convenient access to public transit, which would facilitate a reduction in VMT. As shown in Appendix IS-12 of this IS/MND, the Project's internal capture and transportation demand management (TDM) plan would reduce the number of vehicular trips and related VMT by approximately 34 percent. The Project's estimated VMT reductions would be consistent with regional strategies and would be consistent with and support the goals and benefits of the SCAG RTP/SCS, which seeks improved "mobility and access by placing destinations closer together and decreasing the time and cost of traveling between them. Thus, consistent with 2020–2045 RTP/SCS, the Project would reduce VMT, and, consequently, the Project's petroleum-based fuel usage would be reduced. Additionally, 30 percent of the Project's parking spaces would be designated as Electric Vehicle (EV) spaces capable of supporting future electric vehicle supply equipment (EVSE) and 20 percent of the spaces will be equipped with EV Charging Stations. As such, operational impacts to transportation energy would be less than significant.

Conclusion

Based on the above, operation of the Project would comply with existing applicable energy standards and would not result in wasteful, inefficient, or unnecessary consumption of energy resources. Thus, Project operations would result in less than significant energy resources impacts during operation, and no mitigation measures are required.

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70 City of Los Angeles Municipal Code (LAMC), Chapter IX, Article 9.

71 California Building Standards Commission, 2022 California Green Building Standards Code, California Code of Regulations, Title 24, Part 11, effective January 1, 2023.

b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less Than Significant Impact. The energy conservation policies and plans relevant to the Project include the California Title 24 energy standards, the 2022 CALGreen Code, the City of Los Angeles Green Building Code, City of LA Green New Deal and the 2020–2045 RTP/SCS. As these conservation policies are mandatory under the City's Building Code, the Project would not conflict with applicable plans for renewable energy or energy efficiency. Such requirements of the Title 24, CALGreen and Green Building Code include specific lighting requirements to conserve energy, window glazing to reflect heat, enhanced insulation to reduce heating and ventilation energy usage, and enhanced air filtration. The Project would implement these measures as required by code. The 2022 Title 24 Standards ensure that builders use the most energy efficient and energy conserving technologies and construction practices.

The Project is designed to comply with all applicable state and local codes related to energy, including the City's Green Building Ordinance and the California Green Building Standards Code.[72,73] Design features that would be implemented would include the use of efficient lighting technology; energy efficient heating, ventilation and cooling equipment; and Energy Star rated products and appliances. Specifically, the proposed building would be wrapped in aluminum louvers providing a solar filter and thereby reducing energy use. The Project would include a photo voltaic (PV) array on the rooftop which would generate approximately 455,000 kWh per year. Also, as specified under GHG-PDF-1, Electricity provided to the Project Site would be sourced from the LADWP Green Power Program, which would provide 100 percent renewable energy for Project operations. The Project would also comply with the City's EV charging requirements.[74] Overall, the Project would be designed and constructed in accordance with applicable state and local green building standards that would serve to reduce the energy demand of the Project. In addition, as discussed above, the demand for electricity during construction and operation of the Project would represent a small fraction of LADWP's projected and planned sales. Similarly, as discussed above, petroleum-based fuels during construction and operations would also represent a fraction of the 2026 projected fuel use in Los Angeles County. Therefore, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Impacts would be less than significant, and no mitigation measures are required.

VII. GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				

72 City of Los Angeles Municipal Code (LAMC), Chapter IX, Article 9

73 California Building Standards Commission, 2022 California Green Building Standards Code, California Code of Regulations, Title 24, Part 11, effective January 1, 2023.

74 City of Los Angeles Ordinance No. 186485.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. Be located on a geologic unit 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?	☐	☐	☒	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

The following analysis regarding geology and soils is based on the Geotechnical Engineering Investigation prepared by Geotechnologies, dated August 22, 2022, and the Geotechnical Engineering Investigation Addendum Letter No. 1, dated March 23, 2023, both herein referred to as the Geotechnical Investigation. All specific information on geology and soils conditions on the Project Site in the discussion below is based on the Geotechnical Investigation included as Appendix IS-6 of this IS/MND. The analysis regarding paleontological resources is based on the Paleontological Resources Assessment prepared by Stantec, dated June 13, 2023, and included as Appendix IS-7 of this IS/MND.

a. Would the project directly or indirectly cause 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.

Less Than Significant Impact. Fault rupture occurs when movement on a fault deep within the earth breaks through the surface. Based on criteria established by the California Geologic 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 11,700 years (during the Holocene Epoch). Potentially active faults are those that have ruptured in the last 130,000 years. Inactive faults are those that have not shown evidence of surface displacement within the last 1.6 million years. In addition, there are buried thrust faults, commonly referred to as blind thrust faults, which are faults that are not exposed at the ground surface. In addition, buried thrust faults, which are faults with no surface exposure, may exist in the vicinity of the Project Site; however, 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). [75] 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 designates Fault Rupture Study Areas along the sides of active and potentially active faults to establish areas of potential hazard due to fault rupture.

As indicated in the Geotechnical Investigation, no faults cross or project towards the Project Site and the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone or within a City-designated Fault Rupture Study Area. The closest active fault to the Project Site is the Puente Hills blind thrust fault, which is located approximately 0.4 mile southeast of the Project Site.[76] Therefore, no active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site, and the potential for surface rupture due to faulting occurring beneath the Project Site, is considered low. Impacts would be less than significant, and no mitigation measures are required.

ii. Strong seismic ground shaking?

Less Than 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. As previously stated, no active faults are known to pass directly beneath the Project Site. In addition, state and local code requirements ensure that buildings are designed and constructed in a manner that, although they may sustain damage during a major earthquake, their risk of collapse is substantially reduced. Specifically, the state and City mandate compliance with numerous rules related to seismic safety, including the Alquist-Priolo Earthquake Fault Zoning Act, Seismic Safety Act, Seismic Hazards Mapping Act, the City's General Plan Safety Element, and the Los Angeles Building Code (LABC). Pursuant to those laws, the Project must demonstrate compliance with the applicable provisions of these safety requirements before permits can be issued for construction of the Project. Accordingly, the design and construction of the Project would comply with all applicable existing regulatory requirements, the applicable provisions of the LABC relating to seismic safety, and the application of accepted and proven construction engineering practices, including the specific geotechnical design recommendations set forth for the Project in the Geotechnical Investigation.

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[75] The Alquist-Priolo Earthquake Fault Zoning Act and its regulations are presented in California Department of Conservation, California Geological Survey, Special Publication 42, Earthquake Fault Zones.

[76] City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5166-030-008; -009, http://zimas.lacity.org/, accessed November 16, 2023.

Specifically, the Project would comply with the LABC, which incorporates the current seismic design provisions of the California Building Code (CBC), with City amendments, to minimize seismic impacts. The CBC incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and maximize earthquake safety. Los Angeles Department of Building and Safety (LADBS) is responsible for implementing the provisions of the LABC, and the Project would be required to comply with the plan review and permitting requirements of the LADBS, including the recommendations provided in the geotechnical report for the Project, which will be subject to review and approval by the LADBS. As discussed in the Geotechnical Investigation, while the Project Site is subject to strong ground shaking in the event of an earthquake, this hazard is common in Southern California and the effects of ground shaking can be addressed by proper engineering design and construction in conformance with current building codes and engineering practices. Therefore, with implementation of site-specific recommendations and compliance with regulatory requirements, the Project would not directly or indirectly cause or exacerbate potential substantial adverse effects, including the risk of loss, injury, or death related to strong seismic ground shaking. Impacts would be less than significant, and no mitigation measures are required.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is a phenomenon in which saturated silty to cohesionless soils below the groundwater table are subject to a temporary loss of strength due to the buildup of excess pore pressure during cyclic loading conditions such as those induced by an earthquake. Liquefaction-related effects include loss of bearing strength, amplified ground oscillations, lateral spreading, and flow failures. As discussed in the Geotechnical Investigation, the Seismic Hazards Map of the Los Angeles Quadrangle by the State of California does not classify the Project Site as part of a liquefiable area.[77] Groundwater was not encountered at the site during exploration, conducted to a depth of 55 feet below grade. The historically highest groundwater level for the Project Site is reported at a depth of 145 feet. To an approximate depth of 15 feet, native alluvial soils are composed of sand, silty sand and sandy silt, which are yellowish brown to grayish brown in color, moist, medium dense, or stiff and fine to medium grained. Below a depth of 15 feet, the alluvial soils consist mainly of sands, which are yellowish brown to dark brown in color, moist, dense to very dense, and fine to coarse grained, with interlayered gravel and cobbles. Based on the density of soils underlying the site, the current groundwater level, and the mapped depth to the historically highest groundwater level, the soils underlying the Project Site are not considered capable of liquefaction during the ground motion expected during an earthquake. As such, the Project would not directly or indirectly cause or exacerbate potential adverse effects, including the risk of loss, injury, or death related to seismic-related ground failure, including liquefaction. Impacts would be less than significant, and no mitigation measures are required.

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 the Project Site is generally characterized by relatively level topography. Given the largely impervious (developed/paved) nature of the Project Site, large areas of exposed soil or rocks that could slide or become loose are not present. In addition, the Project Site is not located in a landslide area as mapped by the State of California or the City

[77] California Division of Mines and Geology, 1999, Seismic Hazard Zone Map.

of Los Angeles.[78] [79] Therefore, the Project would not directly or indirectly cause or exacerbate potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. No impacts would occur, and no mitigation measures are required.

b. Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. Development of the Project would require grading, excavation, and other construction activities that have the potential to disturb existing soils within the Project Site and expose these soils to rainfall and wind during construction, thereby potentially resulting in soil erosion. This potential would be reduced by implementation of standard erosion controls imposed during site preparation and grading activities during Project construction. Specifically, all grading activities would require grading permits from LADBS, which would include requirements and standards designed to limit potential effects associated with erosion to acceptable levels. In addition, on site grading and site preparation would comply with all applicable provisions of LAMC Chapter IX, Article 1, which addresses grading, excavations, and fills. Furthermore, the Project would be required to comply with the City's LID ordinance and implement standard erosion controls to limit stormwater runoff, which can contribute to erosion. Regarding soil erosion during Project operations, the potential for erosion is low since the Project Site would be fully developed and no soils would be left exposed. Specifically, as discussed in the Hydrology and Water Resources Technical Report, included as Appendix IS-9 of this IS/MND, the Project Site is 100 percent impervious. There are no pervious surfaces on the project Site. Therefore, impacts would be less than significant, and no mitigation measures are required.

c. Would the project be located on a geologic unit 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?

Less Than Significant Impact. As discussed above, the Project Site is not located in a landslide area as mapped by the state, nor is the Project Site mapped as a landslide area by the City. In addition, the Project would not alter exposed soils on a hill, nor inject water into the soil upslope that could cause a landslide downhill. Therefore, no impacts related to landslides would occur, and no mitigation measures are required.

Liquefaction-related effects include lateral spreading. Since the Project Site is not located in an identified liquefiable area, the potential for lateral spreading would also be considered low. As such, the Project would not be located on a geologic unit or soil that is unstable, which could potentially result in lateral spreading. Impacts related to liquefaction and lateral spreading would be less than significant, and no mitigation measures are required.

Subsidence generally occurs when a large portion of land is displaced vertically, usually due to the rapid and intensive withdrawal of subterranean fluids such as groundwater or oil. As discussed in Section 2, Project Description, of this IS/MND, excavation would occur to a depth of approximately 11 feet. As discussed in the Geotechnical Investigation, the mapped historic-high groundwater level beneath the

[78] City of Los Angeles, 2018 Local Hazard Mitigation Plan, East LA APC, Figure 11-7, Landslide Susceptibility Zones, p. 247.

[79] City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5166-030-008; -009, http://zimas.lacity.org/, accessed November 16, 2023.

Project Site is approximately 145 feet below ground surface. Therefore, dewatering operations are not expected during construction. Moreover, no large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring, or is planned at the Project Site. Further, the Project Site is not located within a designated oil field as mapped by the City. Therefore, there is little to no potential for ground subsidence due to withdrawal of fluid or gas at the Project Site. As such, the Project would not be located on a geologic unit or soil that is unstable, which could potentially result in subsidence. Impacts related to subsidence would be less than significant, and no mitigation measures are required.

Collapsible soils consist of loose, dry, low-density materials that collapse and compact under the addition of water or excessive loading. Soil collapse occurs when the land surface is saturated at depths greater than those reached by typical rain events. As discussed in the Geotechnical Investigation, the soils located within the Project Site are in the very low expansion range and are not susceptible to significant hydroconsolidation. However, fill materials were observed to extend to depths ranging between 3 and 7 feet below the existing grade and were determined unsuitable for support of new foundations and concrete slabs on grade. As described in Section 2, Project Description of this IS/MND, the Project would excavate to a depth of 11 feet below grade and prepare an engineered compacted fill pad as recommended in the design level Geotechnical Investigation. Therefore, the Project Site is not located on a geologic unit or soil that is unstable or that would become unstable as a result of the Project and potentially result in collapse. Impacts associated with collapsible soils would be less than significant.

Based on the above, the Project would not be located on a geologic unit that is unstable, or that would become unstable as a result of the Project. Impacts would be less than significant, and no mitigation measures are required.

d. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Less Than Significant Impact. Expansive soils are typically associated with clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. Due to high clay content, expansive soils expand with the addition of water and shrink when dried, which can cause damage to overlying structures. As discussed above, the soils located within the Project Site are in the very low expansion range and are not susceptible to significant hydroconsolidation. Therefore, the potential of soil expansion is considered negligible. However, if moderately expansive soils are encountered, such soils would be addressed using standard geotechnical design practices (i.e., removal and replacement with non-expansive engineered fill). Furthermore, construction of the Project would be required to comply with the current CBC and supplemental requirements of the LAMC, as enforced by the City through the building permit process. These requirements would include building foundation and other requirements appropriate to site-specific conditions that would be provided in a design-level geotechnical evaluation for the Project as required by the City. In addition, with implementation of the recommendations set forth in the design-level geotechnical evaluation for the Project, as required by the City, the Project would not exacerbate existing environmental conditions that could create substantial risk to life or property due to expansive soils. Impacts would be less than significant, and no mitigation measures are required.

e. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. The Project Site is located within a community served by existing wastewater infrastructure. Like the existing development at the Project Site, 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, and no mitigation measures are required.

f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact with Mitigation Incorporated. 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. The Project Site is located within an urbanized area of the City and has been subject to grading, excavation and fill activities, and development in the past. Thus, surficial paleontological resources that may have existed at one time have likely been previously disturbed.

As previously discussed, the Project Site is underlain by 3 to 7 feet of artificial fill. As discussed in the Paleontological Resources Assessment, included as Appendix IS-G of this IS/MND, this artificial fill consists of silty sand with some brick fragments. As artificial fill has been extensively disturbed and deposited by human activity, it does not include geologic context and is unlikely to preserve fossils. In addition, the artificial fill dates to very recent time. Therefore, the artificial fill is considered to be of low paleontological potential.

The artificial fill is underlain by alluvial sediments, which represent terrestrial deposition of water transported sediments from the surrounding highlands. Two units of alluvium are likely present, with Unit 2 mapped at the surface. Unit 2 consists of unconsolidated and uncemented gravel, sand, silt, and clay which underlie historically flooded areas. These sediments are relatively young in age, dating to the last 1,000 years and range up to 9 feet in thickness. As defined by the Society of Vertebrate Paleontology (SVP), paleontological resources must be over 5,000 years in age, corresponding to the middle part of the Holocene. Therefore, this unit has low paleontological potential.

While Unit 2 is too young to preserve fossils, Unit 1 is of an age to preserve fossils at depth. As fossils are considered by the Society of Vertebrate Paleontology to be older than middle Holocene, or approximately 5,000 years old, the deeper layers of this unit are of an age to preserve paleontological resources, while the surficial and shallow layers are not. As discussed in the Paleontological Resources Assessment, a review of the online, publicly accessible database of the University of California Museum of Paleontology (UCMP) indicates that they have records of 30 fossil localities associated with Holocene nonmarine deposits in Los Angeles County. All 30 of these localities preserved plant fossils, and 28 of them preserved both plant fossils and microfossils. While precise locality data are not provided, one of the localities is listed as being from the Metropolitan Water District Headquarters, which is just east of downtown Los Angeles, with other localities from Santa Monica, the Metrorail University City Station, the San Gabriel River, and from the Angeles National Forest in the northwestern portion of the County. Given the documentation of fossil localities across Los Angeles County, this unit is classified as having low-to-high potential, increasing with depth.

Older alluvium is likely present in the subsurface of the Project Site. As identified in the Geotechnical Investigation, alluvium was reported to a depth of 55 feet below ground surface, but no determination of age of any of the encountered alluvium was made. These sediments consist of moderately to well consolidated, slightly to well cemented, dissected gravel, sand, silt, and clay. These older alluvial sediments are dated to the late Pleistocene (approximately 129,000 to 11,700 years ago) and likely represent the remnants of a piedmont alluvial fan system. As such, they are of an age to preserve fossils and have a similar fossil record to that described above for the early Holocene-aged alluvial sediments.

According to the results of a paleontological records search conducted through the Natural History Museum of Los Angeles County (LACM), several fossil localities known to the LACM were identified in the vicinity of the Project Site from older alluvial sediments similar to those that are likely present in the subsurface of the Project vicinity at an undetermined depth. The closest of these was discovered approximately 1.6 miles to the northwest of the Project Site and consisted of horse fossils encountered 43 feet below ground surface. Two more localities located approximately 2.5 miles to the northeast of the Project Site produced fossils of sabretooth cat, horse, deer, and turkey at unknown depths during excavations for storm drains as well as mastodon fossils at 20 to 35 feet below ground surface. A locality approximately 4 miles to the east of the Project Site produced horse fossils at unknown depths, and another approximately 6.5 miles to the southeast of the Project Site included an array of vertebrate fossils including specimens of fish, snake, and rodents. The UCMP database records show more than 180 Pleistocene nonmarine localities within Los Angeles County, including 17 with a vertebrate component, nine containing preserved plants, and the remainder preserving invertebrate fossils. Given the extensive record of significant fossils recovered from the older layers of alluvial sediments in the region, the older alluvium deposits in the Project vicinity are assessed as having high paleontological potential.

As discussed in Section 2, Project Description, of this IS/MND, the Project would require grading of the Project Site and excavations up to a depth of approximately 11 feet. Given the likely thickness of the younger Unit 2 alluvial deposits as nine feet below ground surface, impacts to deeper sediments with high paleontological potential are likely to be minimal. However, in the unlikely event that paleontological resources are encountered, their damage or construction would constitute a direct adverse impact. As such, the following mitigation measures are proposed. With the implementation of Mitigation Measures GEO-MM-1 and GEO-MM-2, impacts to paleontological resources would be less than significant.

Mitigation Measure GEO-MM-1: The Project Paleontologist shall develop a Worker's Environmental Awareness Program training that communicates requirements and procedures for the inadvertent discovery of paleontological resources during construction, to be delivered by the paleontological monitor to the construction crew prior to the onset of ground disturbance.

Mitigation Measure GEO-MM-2: In the event that paleontological resources are encountered during construction activities, all work shall stop in the immediate vicinity of the finds while the Project Paleontologist assesses and documents the find. Should the Project Paleontologist assess the find as significant, the find shall be collected and curated in an accredited repository along with all necessary associated data and curation fees. Regardless of significance, if fossils are discovered during construction, the Project Paleontologist shall design and implement a paleontological monitoring program for the remainder of ground disturbance.

With regard to a unique geologic feature, the Project Site is currently developed with existing structures and surface parking and there are no unique geologic features on the Project Site. Therefore, the Project would not directly or indirectly destroy a unique geologic feature at the Project Site. No impacts would occur, and no mitigation measures are required.

VIII. GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

a. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

b. Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact. The Project would generate an incremental contribution to GHG emissions. CEQA Guidelines Section 15064.4 does not establish a threshold of significance; instead, lead agencies are called on to establish significance thresholds for their respective jurisdictions in which a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as the CAPCOA, so long as any threshold chosen is supported by substantial evidence.[80] The CEQA Guidelines Amendments also clarify that the effects of GHG emissions are cumulative, and should be analyzed in the context of CEQA's requirements for cumulative impact analyses.[81]

Section 15064.4 of the CEQA guidelines gives lead agencies the discretion to determine whether to assess a project's emissions quantitatively or qualitatively. This regulation recommends considering certain factors, among others, when determining the significance of project's GHG emissions, including the extent to which the project may increase or reduce GHG emissions compared to the existing environment; whether the project exceeds an applicable significance threshold; and the extent to which the project complies with regulations or requirements adopted to implement a reduction or mitigation of GHGs. However, Section 15064.4 does not establish a threshold of significance. Moreover, neither the State, SCAQMD, nor the City of Los Angeles has adopted any numeric threshold for GHG emissions.

[80] CEQA Guidelines Section 15064.7(c).

[81] CEQA Guidelines Section 15130 (f).

The California Natural Resources Agency has also clarified that the effects of GHG emissions are cumulative impacts, and that they should be analyzed in the context of CEQA's requirements for cumulative impact analysis (see Section 15064(h)(3)).[82] Further, the Governor's Office of Planning and Research's (OPR) technical advisory on CEQA and climate change, the Natural Resources Agency's Final Statement of Reasons, and CEQA Guidelines Section 15064.4 provide that a qualitative analysis of project-level impacts to determine whether a project's GHG impacts are significant can be based on a project's consistency with previously approved plans and mitigation programs, as long as such plans have adequately analyzed and mitigated GHG emissions to a less than significant level.[83]

Therefore, the quantification of the Project's GHG emissions is being done for informational purposes, only, and the Project's GHG emissions are not evaluated against any numeric threshold; instead, the Project's GHG emissions are considered consistent with CEQA Guidelines Section 15064.4(b) in the context of whether the Project complies with applicable plans, policies, regulations, and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. For this Project, as a land use development project, the most directly applicable adopted regulatory plan to reduce GHG emissions is the 2020–2045 RTP/SCS, which is designed to achieve regional GHG reductions from the land use and transportation sectors as required by SB 375 and the State's long-term climate goals. This analysis also considers consistency with regulations or requirements set forth by AB 32's 2008 Climate Change Scoping Plan and subsequent updates, and the City of Los Angeles's Sustainable City pLAn/Green New Deal.

Finally, the Project's operational GHG emissions inventory is assessed based on the incremental increase in emissions compared to baseline (existing) conditions. Therefore, the calculation of the Project's operational GHG emissions would subtract the existing emissions of the current use to determine the incremental increase. A specific discussion regarding potential GHG emissions associated with the construction and operational phases of the Project is provided below.

Construction

GHG emissions from construction activities were forecasted using a reasonable estimate of a construction schedule and phasing and applying published GHG emission factors. Construction emissions were calculated using the CalEEMod model. The output values used in this analysis were adjusted to be Project-specific, based on the same equipment usage rates, type of fuel, and construction schedule that were used for the Air Quality analyses. These values were then applied to the same construction phasing assumptions as were used in the criteria pollutant analysis to generate GHG emissions values for each construction year (refer to Appendix IS-1 of this IS/MND for a detailed analysis).

As presented in Table 8 on page 66, construction of the Project is estimated to generate a total of 2,688 metric tons of GHGs measured as an equivalent mass of carbon dioxide ($MTCO_2e$) over the

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[82] See generally California Natural Resources Agency, Final Statement of Reasons for Regulatory Action, December 2009, pp. 11–13, 14, 16; see also Letter from Cynthia Bryant, Director of the Office of Planning and Research to Mike Chrisman, Secretary for Natural Resources, April 13, 2009, www.opr.ca.gov/docs/Transmittal_Letter.pdf, accessed May 1, 2017.

[83] Governor's Office of Planning and Research, Technical Advisory—CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review, 2008; California Natural Resources Agency, Final Statement of Reasons for Regulatory Action, December 2009, p. 22–26.

Table 8
Construction-Related GHG Emissions
($MTCO_2e$)

Year	$MTCO_2e$[a]
2024	1,056
2025	1,176
2026	456
Total	2,688
Amortized Over 30 Years[b]	**90**

$MTCO_2e$ = metric tons of an equivalent mass of carbon dioxide

[a] *CO_2e was calculated using CalEEMod and the results are provided in Section 2.0 of the Construction CalEEMod output file within Appendix IS-1 of this IS/MND.*

[b] *As recommended by SCAQMD, the total GHG construction emissions were amortized over the 30-year lifetime of the project (i.e., total construction GHG emissions were divided by 30 to determine an annual construction emissions estimate that can be added to the Project's operational emissions) in order to determine the Project's annual GHG emissions inventory.*

Source: Eyestone Environmental, 2023.

estimated 31 months of construction (approximately three years).[84] As recommended by SCAQMD, the total GHG construction emissions were amortized over the 30-year lifetime of the Project (i.e., total construction GHG emissions were divided by 30 to determine an annual construction emission estimate that can be added to the Project's operational emissions) in order to determine the Project's annual GHG emissions inventory.[85]

A complete listing of the construction equipment by on-site and off-site activities, duration, and emissions estimation model input assumptions provided used in this analysis is included within the emissions calculation worksheets that are provided in Appendix IS-1 of this IS/MND.

Operation

The Project would result in direct and indirect GHG emissions generated by the increase in vehicular trips as compared to the existing uses at the Project Site, as well as difference in operations associated with the Project buildings, including: (1) building operations: emissions associated with space heating and cooling, water heating, and lighting; (2) water: emissions associated with energy used to pump, convey, treat, deliver, and re-treat water; and (3) solid waste: emissions associated with waste streams (embodied energy of materials). The Project would comply with the requirements of Title 24, CALGreen Building Code, the City's Green New Deal and the Los Angeles Green Building Code, which would serve to reduce GHG emissions.

[84] Construction assumptions are contained in Appendix IS-1 of this IS/MND, Construction Schedule and Equipment Requirements, and were obtained from DPR Construction. Construction emissions conservatively do not account for the offsetting emissions from decommissioning of existing operational uses during construction. All construction emissions are considered new emissions.

[85] SCAQMD, Draft Guidance Document—Interim CEQA Greenhouse Gas (GHG) Significance Threshold, October 2008.

Operational emissions from the sources described above were estimated using CalEEMod for the Project in order to determine the net incremental change in GHG emissions. Calculation of the Project's operational emissions are the difference in emissions from Buildout land uses and Existing land uses for the Buildout year (2026). Mobile source emissions are based on the vehicle emission factors from EMFAC and the Project's daily VMT provided as discussed in Section XVII, Transportation and in the Transportation Assessment included as Appendix IS-12 of this IS/MND. The Project's daily VMT was calculated using the LADOT VMT Calculator (Appendix B of the Transportation Assessment). As shown in Table 9 on page 68, the Project without Project Design Features assumes compliance with Title 24 and the Los Angeles Green Building Code which results in a net increase of 5,661 $MTCO_2e$ annually.

Also shown in Table 9, the Project with Project Design Features takes into account VMT reduction features such as proximity to transit, job centers and high density development, and energy reduction features such as use of LED lighting; high efficiency toilets with a flush volume of 1.28 gallons per flush, or less, high efficiency urinals, and showerheads with a flow rate of 1.5 gallons per minute or less to promote a reduction of indoor and outdoor water use; Energy Star–labeled appliances; and water-efficient landscape design as well as compliance with Title 24 and Green Building code requirements. The Project would also commit to net-zero GHG design in which the Project will off-set GHG emissions related to building operations. The Project would commit to participating in the LADWP Green Power Program which allows purchase of 100% renewable electricity. As a result, the Project with Project Design Features would result in a net increase of 4,129 $MTCO_2e$ annually. Thus, the Project Design Features result in a reduction of approximately 1,532 $MTCO_2e$ annually.

Consistency with Applicable Plans and Policies

In September 2006, Governor Arnold Schwarzenegger signed the California Global Warming Solutions Act of 2006, also known as AB 32, into law. AB 32 commits the State to the following:

By 2010, reduce to 2000 emission levels;

- By 2020, reduce to 1990 levels; and
- By 2050, reduce to 80 percent below 1990 levels.

AB 32 requires that CARB determine what the statewide GHG emissions level was in 1990 and approve a statewide GHG emissions limit that is equivalent to that level, to be achieved by 2020. Executive Order (EO) B-30-15, which was issued in April 2015 by Governor Brown, requires statewide GHG emissions to be reduced by 40 percent below 1990 levels by 2030. SB 32, signed into law in September 2016, codifies the 2030 GHG reduction target in EO B-30-15. Also, pursuant to AB 32, CARB must adopt rules and regulations in an open public process to achieve the maximum, technologically feasible, and cost-effective GHG reductions.[86]

[86] California Air Resources Board. AB 32 Global Warming Solutions Act of 2006. ww2.arb.ca.gov/resources/fact-sheets/ab-32-global-warming-solutions-act-2006, accessed April 12, 2023.

Table 9
Operational Greenhouse Gas Emissions (Net Increase)

Emission Source	Project Without Project Design Features CO_2e (metric tons)[a]	Project With Project Design Features CO_2e (metric tons)[a]
Area[b]	10	10
Energy[c]	1,456	1,309
Mobile	3,980	2,595
Mechanical Parking Lift	222	222
EV Chargers	(70)	(70)
Stationary[d]	23	23
Solid Waste[e]	24	24
Water/Wastewater[f]	104	91
Refrigerants	(177)	(177)
Construction	90	90
Total Emissions	**5,661**	**4,129**

[a] *CO_2e was calculated using CalEEMod and the results are provided in Section 2.0 of the Operation CalEEMod output file within Appendix IS-1 of this IS/MND.*

[b] *Area source emissions are from landscaping equipment.*

[c] *Energy source emissions are based on CalEEMod default electricity and natural gas usage rates.*

[d] *Stationary source emissions are from an on-site emergency generator.*

[e] *Solid waste emissions are calculated based on CalEEMod default solid waste generation rates.*

[f] *Water/wastewater emissions are calculated based on CalEEMod default water consumption rates.*

Source: Eyestone Environmental, 2023.

To achieve these goals, AB 32 mandates that CARB establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce statewide GHG emissions from stationary sources, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved.

The Scoping Plan is a strategy the California Air Resources Board (CARB) develops and updates at least once every five years, as required by AB 32. It lays out the transformations needed to reduce GHG emissions and reach the State's climate targets. CARB published the Final 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan Update) in November 2022 and it is the third update to the original plan that was adopted in 2008. The initial Scoping Plan laid out a path to achieve the AB 32 2020 limit of returning to 1990 levels of GHG emissions, a reduction of approximately 15 percent below business as usual.[87] The 2008 Scoping Plan included a mix of incentives, regulations, and carbon pricing, laying out the portfolio approach to addressing climate change and clearly making the case for using multiple tools to meet California's GHG targets. The 2013 Scoping Plan Update assessed progress toward

[87] CARB. 2008. Climate Change Scoping Plan. ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/document/adopted_scoping_plan.pdf.

achieving the 2020 limit and made the case for addressing short-lived climate pollutants (SLCPs).[88] The most recent update, the 2017 Scoping Plan,[89] also assessed the progress toward achieving the 2020 limit and provided a technologically feasible and cost-effective path to achieving the Senate Bill 32 (SB 32, Pavley, Chapter 249, Statutes of 2016) target of reducing GHGs by at least 40 percent below 1990 levels by 2030.

The 2022 Scoping Plan Update is the most comprehensive and far-reaching Scoping Plan developed to date. It identifies a technologically feasible and cost-effective path to achieve carbon neutrality by 2045 and to reduce anthropogenic GHG emissions to at least 85 percent below 1990 levels, while also assessing the progress California is making toward reducing its GHG emissions by at least 40 percent below 1990 levels by 2030, as called for in SB 32 and laid out in the 2017 Scoping Plan.[90] The 2030 target is an interim but important stepping stone along the critical path to the broader goal of deep decarbonization by 2045. The relatively longer path assessed in the 2022 Scoping Plan Update incorporates, coordinates, and leverages many existing and ongoing efforts to reduce GHGs and air pollution, while identifying new clean technologies and energy. Given the focus on carbon neutrality, the 2022 Scoping Plan Update also includes discussion for the first time of the Natural and Working Lands (NWL) sectors as both sources of emissions and carbon sinks.

Achieving the targets described in the 2022 Scoping Plan Update will require continued commitment to and successful implementation of existing policies and programs and identification of new policy tools and technical solutions to go further, faster. California's Legislature and state agencies will continue to collaborate to achieve the state's climate, clean air, equity, and broader economic and environmental protection goals. It will be necessary to maintain and strengthen this collaborative effort, and to draw upon the assistance of the federal government, regional and local governments, tribes, communities, academic institutions, and the private sector to achieve the state's near-term and longer-term emission reduction goals and a more equitable future for all Californians. The Scoping Plan acknowledges that the path forward is not dependent on one agency, one state, or even one country. However, the State can lead by engaging Californians and demonstrating how action at the state, regional, and local levels of governments, as well as action at community and individual levels, can contribute to addressing the challenge.

Aligning local jurisdiction action with state-level priorities to tackle climate change and the outcomes called for in the 2022 Scoping Plan Update is critical to achieving the statutory targets for 2030 and 2045. The 2022 Scoping Plan Update discusses the role of local governments in meeting the State's GHG reductions goals. Local governments have the primary authority to plan, zone, approve, and permit how and where land is developed to accommodate population growth, economic growth, and the changing needs of their jurisdictions. As a result, local government decisions play a critical role in supporting state-level measures to contain the growth of GHG emissions associated with the transportation system and the built environment—the two largest GHG emissions sectors over which local governments have

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88 CARB. First Update to the Climate Change Scoping Plan. 2014. ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/2013_update/first_update_climate_change_scoping_plan.pdf.

89 CARB. California's 2017 Climate Change Scoping Plan, 2017. ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf.

90 CARB, California's 2017 Climate Change Scoping Plan, 2017, ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf.

authority. The City has taken the initiative in combating climate change by developing programs and regulations such as the Green New Deal and Green Building Code.

Appendix D, Local Actions, of the 2022 Scoping Plan Update includes "recommendations intended to build momentum for local government actions that align with the State's climate goals, with a focus on local GHG reduction strategies (commonly referred to as climate action planning) and approval of new land use development projects, including through environmental review under the California Environmental Quality Act (CEQA)." (Page 4 of Appendix D.)

The State encourages local governments to adopt a CEQA-qualified CAP addressing the three priority areas (transportation electrification, VMT reduction, and building decarbonization). However, as not all jurisdictions have sufficient resources (e.g., technical expertise, staffing, funding) to do so, jurisdictions that wish to take meaningful climate action (such as preparing a non-CEQA-qualified CAP or as individual measures) aligned with the State's climate goals in the absence of a CEQA-qualified CAP should also look to the three priority areas when developing local climate plans, measures, policies, and actions. "By prioritizing climate action in these three priority areas, local governments can address the largest sources of GHGs within their jurisdiction." (Page 9 of Appendix D of the 2022 Scoping Plan Update.)

With regard to a unique geologic feature, the Project Site is currently developed with existing structures and surface parking and there are no unique geologic features on the Project Site. Therefore, the Project would not directly or indirectly destroy a unique geologic feature at the Project Site. No impacts would occur, and no mitigation measures are required.

The State also recognizes in Appendix D, Local Actions, of the Scoping Plan that each community or local area has distinctive situations and local jurisdictions must balance the need for housing while demonstrating that a Project is in alignment with the State's Climate Goals. Jurisdictions should avoid creating targets that are impossible to meet as a basis to determine significance. Ultimately, targets that make it more difficult to achieve statewide goals by prohibiting or complicating projects that are needed to support the State's climate goals, like infill development, low-income housing or solar arrays, are not consistent with the State's goals. The State also recognizes the lead agencies' discretion to develop evidence-based approaches for determining whether a project would have a potentially significant impact on GHG emissions.

As discussed above, jurisdictions that want to take meaningful climate action (such as preparing a non-CEQA-qualified CAP or as individual measures) aligned with the State's climate goals in the absence of a CEQA-qualified CAP should also look to the three priority areas (transportation electrification, VMT reduction, and building decarbonization). To assist local jurisdictions, the 2022 Scoping Plan Update presents a non-exhaustive list of impactful GHG reduction strategies that can be implemented by local governments within the three priority areas (Priority GHG Reduction Strategies for Local Government Climate Action Priority Areas).[91] A detailed assessment of goals, plans, policies implemented by the City which would support the GHG reduction strategies in the three priority areas is provided below. In addition, further details are provided regarding the correlation between these reduction strategies and

[91] Table 1 of Appendix D, 2022 Scoping Plan Update, November 2022.

applicable actions included in Table 2-1 (page 72) of the Scoping Plan (Actions for the Scoping Plan Scenario).

The California Attorney General's Office has taken an active role in addressing climate change in CEQA documents. The Attorney General's Office has created and routinely updates a Fact Sheet listing project design features to reduce GHGs.[92] The Attorney General's Office created the Fact Sheet primarily for the benefit of local agencies processing CEQA documents, noting that "local agencies will help to move the State away from 'business-as-usual' and toward a low-carbon future."[93] The Fact Sheet explains that the listed "measures can be included as design features of a project," but emphasizes that they "should not be considered in isolation, but as part of a larger set of measures that, working together, will reduce greenhouse gas emissions and the effects of global warming."[94]

The Governor's OPR recommended Amendments to the CEQA Guidelines for GHGs which were adopted on December 30, 2009. CEQA Guidelines Section 15064.4 was adopted to assist lead agencies in determining the significance of the impacts of GHGs. Consistent with the developing practice, this section of the CEQA Guidelines urges lead agencies to quantify GHG emissions of projects where possible, but also indicates that a that a full "life-cycle" analysis is not required. In addition to quantification, CEQA Guidelines Section 15064.4 recommends consideration of several other qualitative factors that may be used in the determination of significance (i.e., the extent to which the project may increase or reduce GHG emissions compared to the existing environment; whether the project exceeds an applicable significance threshold; and the extent to which the project complies with regulations or requirements adopted to reduce or mitigate GHGs).

Lead agencies must either establish significance thresholds for their respective jurisdictions or determine significance on a case-by-case basis. The lead agency should use its "careful judgment" in making a determination of significance, and should make a "good-faith" effort to "describe, calculate or estimate" the amount of GHGs that will result from a project.[95,96] The lead agency is given the discretion to select a reasonable model and methodology to quantify GHGs and to rely on a qualitative analysis or performance based standards for its determination.[97] A lead agency should also consider the following factors, among others, when assessing the significance of impacts from GHGs: (1) the extent to which the project may increase or reduce GHGs; (2) whether the GHG emissions exceed a threshold of significance that the lead agency determines applies to the project; and (3) the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, local plan for the reduction or mitigation of GHG emissions.[98]

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92 California Attorney General's Office Fact Sheet, The CEQA—Addressing Global Warming Impacts at the Local Agency Level, revised January 6, 2010.

93 California Attorney General's Office Fact Sheet, The CEQA—Addressing Global Warming Impacts at the Local Agency Level, revised January 6, 2010.

94 California Attorney General's Office Fact Sheet, The CEQA—Addressing Global Warming Impacts at the Local Agency Level, revised January 6, 2010.

95 CEQA Guidelines Section 15064.4(a).

96 CEQA Guidelines Section 15064.4(a).

97 CEQA Guidelines Section 15064.4(a)(1)-(2).

98 CEQA Guidelines Section 15064.4(b).

CEQA Guidelines Section 15064 provides that a determination that an impact is not cumulatively considerable may rest on compliance with previously adopted plans or regulations, including plans or regulations for the reduction of GHG emissions.

As discussed above, no applicable numeric significance threshold for GHG emissions has been adopted by the State, SCAQMD, or the City of Los Angeles. Although state, regional, and local plans and policies have been adopted to help address climate change (see discussions above), no current law or regulation would regulate all aspects of the Project's GHG emissions. In the absence of any adopted numeric threshold, the significance of the Project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b)(2) by considering whether the Project complies with applicable plans, policies, regulations and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions.

As discussed above, a significant impact would occur if the Project would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment by conflicting with applicable regulatory plans and policies to reduce GHG emissions as discussed within CARB's Scoping Plan and subsequent updates, SCAG's 2020–2045 RTP/SCS, and the City's Green New Deal. The analysis below describes the extent to which the Project complies with or exceeds the performance-based standards included in the regulations outlined in these plans. As shown herein, the Project would be consistent with the applicable GHG reduction plans and policies.

CARB's 2022 Climate Change Scoping Plans

The Scoping Plan includes a range of GHG reduction actions that include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms such as a Cap-and-Trade system, and an AB 32 implementation fee to fund the program. The following discussion demonstrates how the pertinent reduction actions relate to and reduce Project-related GHG emissions.

Regulatory Framework

The following applicable mandatory reduction actions/strategies would serve to indirectly reduce Project GHG emissions:

Renewable Portfolio Standard (RPS) Program and SB 2X: The California RPS program (Updated under Senate Bill (SB) 2X) requires both public and investor-owned utilities in California to receive at least 33 percent of their electricity from renewable sources by the year 2020. SB 350 further requires 50 percent renewables by 2030. In 2020, LADWP indicated that 34 percent of its electricity came from renewable resources in Year 2019. The CalEEMod default carbon intensity for electricity generated by LADWP (pounds of CO2e per MWh) is based on a year 2007 renewables portfolio of 8 percent and was therefore updated within CalEEMod to reflect the year 2026 renewables portfolio. Please note that under recently passed SB 100, LADWP is required to generate electricity that would increase renewable energy resources to 50 percent by 2026, 60 percent by 2030, and 100 percent by 2045. The Project complies with these percentage renewable requirements because the Project is served by LADWP. Electricity GHG emissions provided above in Table 9 on page 68 conservatively do not account for the additional 50-percent reduction that would be achieved by LADWP in year 2045 (difference between the 50 percent renewables assumed for the buildout year of 2026 and 100 percent required under SB 2X in year 2045).

Given LADWP's demonstrated progress towards meeting and exceeding the established targets, as well as potential penalties for non-compliance, it is reasonably assumed that LADWP will comply.

- **SB 350:** As required under SB 350, doubling of the energy efficiency savings from final end uses of retail customers by 2030 would primarily rely on the existing suite of building energy efficiency standards under CCR Title 24, Part 6 (discussed below) and utility-sponsored programs such as rebates for high-efficiency appliances, HVAC systems, and insulation. The Project would further support this action/strategy because it includes energy-efficient light-emitting diode (LED) lighting as well as Energy Star–labeled appliances for the Project.

- **Cap-and-Trade Program:** The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, this regulatory program applies to electric service providers and not directly to the Project. That being said, while not quantified in this analysis, the Project would benefit from this regulatory program in that the GHG emissions associated with the Project's electricity usage per year presented in Table 9 on page 68 would indirectly be covered by the Cap-and-Trade Program.

- **Advanced Clean Cars Program:** CARB approved the Advanced Clean Cars Program in 2012 which establishes an emissions control program for model years 2017 through 2025 and increases the number of zero emission vehicles manufactured in the 2018 through 2025 model years.[99] Standards under the Advanced Clean Cars Program apply to all passenger vehicles and light duty trucks within California and indirectly used by employees and deliveries to the Project. Since the CalEEMod model default fleet mix for the Air Basin does not yet account for this regulation, the Project's mobile source GHG emissions provided in Table 9 on page 68 are conservative because they could not be adjusted to include this additional 34-percent reduction, even though the Project's emissions would be reduced as a result of this Program. The Project would support this regulation since the Project would comply with the City's EV charging requirements, which specify that 10 percent of new parking spaces would require EV charging equipment.[100] The Project would further support this regulation since at least 30 percent of the Project's parking spaces would be designated as Electric Vehicle (EV) spaces capable of supporting future electric vehicle supply equipment (EVSE) and 20 percent of the spaces will be equipped with EV Charging Stations.

- **Low Carbon Fuel Standard (LCFS)**: The current LCFS requires a reduction of at least 8.75 percent in the carbon intensity (CI) of California's transportation fuels by 2021.[101] CalEEMod includes implementation of LCFS into the calculation of GHG emissions from mobile sources. However, the LCFS was amended in September 2018 to target a 20-percent reduction in CI from a 2010 baseline by 2030. As discussed previously, the CalEEMod model does not take into account the more recent updates to LCFS. The Project's emissions inventory conservatively does not take credit for additional GHG reductions due to the more recent LCFS requirements, but this additional 10-percent reduction in CI would indirectly reduce the Project's mobile source emissions.

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99 CARB, Advanced Clean Cars Program, ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program/about, accessed April 12, 2023.

100 City of Los Angeles, Ordinance No. 186485.

101 California Air Resources Board, Data Dashboard, ww3.arb.ca.gov/fuels/lcfs/dashboard/dashboard.htm, accessed April 12, 2023.

- **California Integrated Waste Management Act of 1989:** The regulation requires each jurisdiction's source reduction and recycling element to include a diversion of 50 percent of all solid waste by 2000.[102] AB 341 (2011) amended the regulation to include a provision declaring that it is the policy goal of the state that not less than 75 percent of solid waste generated be source reduced, recycled, or composted by the year 2020, and annually thereafter.[103] The Project would comply with these percentage recycling requirements as the Project is served by the City of Los Angeles, which currently achieves a diversion rate of 76 percent.[104] Project-related GHG emissions from solid waste generation provided in Table 9 on page 68 includes a 76-percent reduction in solid waste generation source emissions consistent with the minimum diversion rate required for the City of Los Angeles (CalEEMod default diversion rate is zero percent). The Applicant must also only contract for waste disposal services with a company that recycles solid waste in compliance with AB 341.[105] In addition, the Project would provide recycling bins at appropriate locations to promote recycling of paper, metal, glass and other recyclable material. Consistent with CALGreen requirements, the Project would recycle and/or salvage at least 65 percent of non-hazardous construction and demolition debris, and the Applicant would prepare a construction waste management plan that, at a minimum, identifies the materials to be diverted from disposal and whether the materials would be sorted on-site or comingled.[106]

Applicable Scoping Plan Measures

Further evaluation of project design features and specific applicable polices and measures in the Scoping Plan is provided below. As shown below, the Project would not conflict with the policies included in the Scoping Plan.

CCR, Title 24, Building Standards Code: The 2022 Building Energy Efficiency Standards contained in Title 24, Part 6 (also known as the California Energy Code), requires the design of building shells and building components to conserve energy. The Project would not conflict with the regulatory requirements as the Project must comply with applicable provisions of the 2020 Los Angeles Green Code that in turn require compliance with mandatory standards included in the California Green Building Standards such as automatic lighting controls, electric vehicle charging requirements and reduced flow rate of plumbing fixtures to conserve water.[107,108] The Project would further support this regulation since the Project would incorporate energy-efficient LED lighting throughout the Project, reducing overall energy usage compared to baseline conditions. In addition, lighting and energy usage for new structures would comply with Title 24 standards.

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[102] California Legislative Information, State of California Public Resources Code Section 41780, https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PRC&sectionNum=41780, accessed April 12, 2023.

[103] California Legislative Information, Assembly Bill No. 341, https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201120120AB341, accessed April 12, 2023.

[104] City of Los Angeles Zero Waste Progress Report, March 2013.

[105] CalRecycle, Mandatory Commercial Recycling, www.calrecycle.ca.gov/recycle/commercial, accessed April 12, 2023.

[106] CalRecycle, CALGreen Construction Waste Management Requirements, www.calrecycle.ca.gov/lgcentral/library/canddmodel/instruction/newstructures, accessed April 12, 2023.

[107] City of Los Angeles Municipal Code (LAMC), Chapter IX, Article 9.

[108] California Building Standards Commission, 2019 California Green Building Standards Code, California Code of Regulations, Title 24, Part 11, effective January 1, 2020.

- **Senate Bill (SB) 375:** SB 375 requires integration of planning processes for transportation, land-use and housing. Under SB 375, each Metropolitan Planning Organization (MPO) would be required to adopt a Sustainable Community Strategy (SCS) to encourage compact development that reduces passenger vehicle miles traveled and trips so that the region will meet a target, created by CARB, for reducing GHG emissions. The Project represents an infill development within an existing urbanized area that would introduce new employment, within an HQTA, consistent with the overall growth pattern encouraged in the RTP/SCS.[109] The Project Site is also well served by public transportation and the Project provides the required short- and long-term bicycle parking spaces in compliance with the requirements of the LAMC. These and other measures would further promote a reduction in VMT and subsequent reduction in GHG emissions. Therefore, the Project would be consistent with SB 375 and the reduction in passenger vehicle GHG emissions provided in the 2016–2040 RTP/SCS. Furthermore, as shown in Appendix IS-1, incorporation of USEPA MXD VMT reduction features applicable to the Project results in a 34-percent reduction in overall VMT in comparison to a Project without these reduction features. This reduction in Project-related VMT would support the goal of the 2020–2045 RTP/SCS to reduce GHG emissions from passenger vehicles.

- **Senate Bill X7-7:** The Water Conservation Act of 2009 set an overall goal of reducing per-capita urban water use by 20 percent by December 31, 2020. The state was required to make incremental progress toward this goal by reducing per-capita water use by at least 10 percent by December 31, 2015. This senate bill was an implementing measure of the Water Sector of the AB 32 Scoping Plan. Reduction in water consumption directly reduces the energy and the associated emissions necessary to convey, treat, and distribute the water; it also reduces emissions from wastewater treatment. The Project would comply with the City of Los Angeles Green Building Code which requires a 20 percent reduction in water usage.[110]

Local Actions for Supporting Scoping Plan Goals

As discussed above, jurisdictions that want to take meaningful climate action (such as preparing a non-CEQA-qualified CAP or as individual measures) aligned with the State's climate goals in the absence of a CEQA-qualified CAP should also look to the three priority areas. To assist local jurisdictions, the 2022 Scoping Plan Update presents a non-exhaustive list of impactful GHG reduction strategies that can be implemented by local governments within the three priority areas (transportation electrification, VMT reduction, and building decarbonization).[111] A detailed assessment of goals, plans, policies implemented by the City which would support the GHG reduction strategies in the three priority areas is provided below.

- **Convert local government fleets to zero-emission vehicles (ZEV):** The City of LA Green New Deal (Sustainable City pLAn 2019) identifies a number of measures to reduce VMT and associated GHG emissions. Such measures that would support the local reduction strategy include converting all city fleet vehicles to zero emission where technically feasible by 2028. Starting in 2021, all vehicle procurement will follow a "zero emission first" policy for City fleets. The Green New Deal also establishes a target to increase the percentage of zero emission vehicles to 25 percent by 2025, 80 percent by 2035 and 100 percent by 2050. In order to

[109] SCAG 2020–2045 RTP/SCS. Exhibit 2.8 Priority Growth Area—High Quality Transit Areas.

[110] City of Los Angeles Municipal Code (LAMC), Section 99.04.303.

[111] Insert reference to Table 1 of Appendix D 2022 Scoping Plan Update, November 2022.

achieve this goal, the City would build 20 Fast Charging Plazas throughout the City. The City would also install 28,000 publicly available chargers by 2028 to encourage adoption of ZEVs.

- **Create a jurisdiction-specific ZEV ecosystem to support deployment of ZEVs statewide:** The City's goals of installing EV chargers throughout the City would be consistent with the Scoping Plan goals of transitioning to EVs. In addition, the Project would comply with Ordinance No. 186485 by installing EV chargers in at least 10 percent of total proposed parking spaces which would exceed the CALGreen 2022 requirement.

- **Reduce or eliminate minimum parking standards in new developments and Implement parking pricing or transportation demand management pricing strategies:** The City of Los Angeles Mobility Plan 2035 which is the Transportation Element of the City's General Plan contains measures and programs related to VMT reduction throughout the City. With regard to parking standards, Mobility Plan Program No. PK.13 would reduce parking requirements for developments near transit (within half a mile) while Program No. PK.3 would allow for individualized parking requirements where businesses can identify parking demand and can reduce on-site parking with TDM strategies. These reduction strategies would serve to reduce minimum parking standards in order to reduce vehicle trips.

- **Implement Complete Streets policies and investments, consistent with general plan circulation element requirements:** The City of Los Angeles Mobility Plan 2035 established a "Complete Streets" planning framework which resulted in the City of Los Angeles Complete Streets Design Guide in 2015 consistent with California's Complete Streets Act of 2008. A supplemental update to the Complete Streets Design Guide was adopted in 2020. The Complete Streets Design Guide provides a number of measures to increase public access to electric shuttles, car sharing and walking. The Design Guide establishes guidelines for establishing on-street parking for car sharing. The City has also established BlueLA which is a car sharing network consisting of more than 100 electric vehicles located throughout the City. In addition, under the Green New Deal, the City would install 28,000 publicly available chargers by 2028 and introduce 135 new electric DASH buses

- **Increase access to public transit by increasing density of development near transit, improving transit service by increasing service frequency, creating bus priority lanes, reducing or eliminating fares, microtransit, etc. Increase public access to clean mobility options by planning for and investing in electric shuttles, bike share, car share, and walking. Amend zoning or development codes to enable mixed-use, walkable, transit-oriented, and compact infill development (such as increasing the allowable density of a neighborhood):** These reduction strategies are supported through implementation of SB 375 which requires integration of planning processes for transportation, land-use and housing and generally encourages jobs/housing proximity, promote transit-oriented development (TOD), and encourages high-density residential/commercial development along transit corridors. To implement SB 375 and reduce GHG emissions by correlating land use and transportation planning, SCAG adopted the 2020–2045 RTP/SCS, also referred to as Connect SoCal. The 2020–2045 RTP/SCS' "Core Vision" prioritizes the maintenance and management of the region's transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and complete streets.

- **Adopt all-electric new construction reach codes for residential and commercial uses:** The City has adopted an All-Electric Buildings Ordinance effective April 1, 2023, which will reduce GHG emissions related to natural gas combustion. Under this ordinance, all building permit applications for newly constructed buildings will be required to be all-electric with some exceptions such as cooking within restaurant uses. Space heating, water heating and cooking for non-restaurant uses would be required to be powered by electricity. In future years, the

LADWP will be required to increase the amount of renewable energy in the power mix to comply with SB 100 requirements. The combination of the All-Electric ordinance and increasing availability of renewable energy will serve to reduce GHG emissions from sources traditionally powered by natural gas.

- **Building Decarbonization.** The priority GHG reduction strategies for local government climate action related to electrification are discussed below and would support the Scoping Plan actions regarding meeting increased demand for electrification without new fossil gas-fire resources and all electric appliances beginning in 2026 (residential) and 2029 (commercial) (see Table 2-1 of the Scoping Plan). California's transition away from fossil fuel–based energy sources will bring the project's GHG emissions associated with building energy use down to zero as our electric supply becomes 100 percent carbon free. California has committed to achieving this goal by 2045 through SB 100, the 100 Percent Clean Energy Act of 2018. SB 100 strengthened the State's Renewables Portfolio Standard (RPS) by requiring that 60 percent of all electricity provided to retail users in California come from renewable sources by 2030 and that 100 percent come from carbon-free sources by 2045. The land use sector will benefit from RPS because the electricity used in buildings will be increasingly carbon-free, but implementation does not depend (directly, at least) on how buildings are designed and built. The City has updated the LAMC with requirements for all new buildings, with some exceptions to being all-electric, which will reduce GHG emissions related to natural gas combustion. Space heating, water heating and cooking for non-restaurant uses would be required to be powered by electricity. In future years, the LADWP will be required to increase the amount of renewable energy in the power mix to comply with SB 100 requirements. The combination of the all-electric LAMC regulations and increasing availability of renewable energy will serve to reduce GHG emissions from sources traditionally powered by natural gas. As the Project is designed to be 100 percent electric, the Project would comply with the City's LAMC and would not include natural gas uses. Therefore, the Project would be consistent and not conflict with the LAMC.

- **Adopt policies and incentive programs to implement energy efficiency retrofits for existing buildings, such as weatherization, lighting upgrades, and replacing energy-intensive appliances and equipment with more efficient systems (such as Energy Star-rated equipment and equipment controllers):** This reduction strategy would support the Scoping Plan action regarding electrification of appliances in existing residential buildings (see Table 2). The City and Los Angeles Department of Water and Power has established rebate programs to promote use of energy-efficient products and home upgrades. Under the LADWP's Consumer Rebate Program (CRP), residential customers would receive rebates for energy-efficient upgrades such as Cool Roofs, Energy Star Windows, HVAC upgrades, pool pumps and insulation upgrades. Such upgrades would serve to reduce wasteful energy and water usage and associated GHG emissions.

The Project represents an infill development within an existing urbanized area that would concentrate new development consistent with the overall growth pattern encouraged in the RTP/SCS. The Project's convenient access to public transit and opportunities for walking and biking would result in a reduction of vehicle trips, vehicle miles traveled (VMT), and GHG emissions. Specifically, the Project Site is located in a transit-rich neighborhood serviced by the Los Angeles County Metropolitan Transit Authority (Metro) and LADOT bus lines. In addition, the Project Site's proximity to a variety of commercial uses and services would encourage employees of the Project Site to walk to nearby destinations to meet their shopping needs, thereby reducing VMT and GHG emissions. Therefore, the Project would be consistent with these reduction strategies. While these reduction strategies mainly apply traffic circulation infrastructure within the City, the Project would support these reduction strategies.

The Project would implement Project Design Feature GHG-PDF-1 which would require purchase of 100 percent renewable (zero-carbon) electricity during project operations and GHG-PDF-2 would not allow use of natural gas within restaurant uses. Therefore, the Project would be consistent with or not conflict with the City's GHG reduction policies.

SCAG 2020–2045 RTP/SCS

The purpose of SB 375 is to implement the State's GHG emissions reduction goals by integrating land use planning with the goal of reducing car and light-duty truck travel. Reflecting that purpose, the primary goal of the 2020–2045 RTP/SCS is to provide a framework for future growth that will decrease per capita GHG emissions from cars and light-duty trucks based on land use planning and transportation options.[112] To accomplish this goal, the 2020–2045 RTP/SCS identifies various strategies to reduce per capita VMT. The 2020–2045 RTP/SCS is expected to help SCAG reach its GHG reduction goals, as identified by CARB, with reductions in per capita passenger vehicle GHG emissions for specified target years.[113]

In addition to demonstrating the region's ability to attain and exceed the GHG emission-reduction targets set forth by CARB, the 2020–2045 RTP/SCS outlines a series of actions and strategies for integrating the transportation network with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands.[114] Thus, successful implementation of the 2020–2045 RTP/SCS would result in more complete communities with a variety of transportation and housing choices, while reducing automobile use. With regard to individual developments, such as the Project, strategies and policies set forth in the 2020–2045 RTP/SCS can be grouped into the following three categories: (1) reduction of vehicle trips and VMT; (2) increased use of alternative fuel vehicles; and (3) improved energy efficiency.[115] These strategies and policies are addressed below. Also, as explained immediately below, the Project is consistent with applicable growth forecasts.

Consistency with Integrated Growth Forecast

The 2020–2045 RTP/SCS provides socioeconomic forecast projections of regional population growth. The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on the local plans and policies applicable to the specific area; these are used by SCAG in all phases of implementation and review.[116] As discussed in Response to Checklist Question XIV.a, Population and Housing, below, the Project is consistent with the regional growth projections for the Los Angeles Subregion.

Consistency with VMT Reduction Strategies and Policies

The Project is designed and would be constructed to incorporate features to support and promote environmental sustainability. The Project represents an infill development within an existing urbanized area that is well served by public transportation and located adjacent to several Metro bus stops. As

[112] SCAG, Connect SoCal (2020–2045 RTP/SCS), adopted September 2020.

[113] SCAG, Connect SoCal (2020–2045 RTP/SCS), adopted September 2020.

[114] SCAG, Connect SoCal (2020–2045 RTP/SCS), adopted September 2020.

[115] SCAG, Draft Program EIR for the 2020–2045 RTP/SC, Section 3.8, Greenhouses, December 2019, p. 3.8-61.

[116] SCAG, Connect SoCal (2020–2045 RTP/SCS), adopted September 2020.

discussed in Response to Checklist XVII.A, Transportation, below, the Project is estimated to generate lower VMT per employee for employees than the average for the area. Additionally, the Project incorporates several TDM measures (e.g., provide required short- and long-term bicycle parking spaces in compliance with the requirements of the LAMC) to reduce the number of single occupancy vehicle trips to the Project Site. Trip generation and VMT were calculated using the LADOT VMT Calculator which accounts for project features such as increased density and proximity to transit. As shown in Appendix IS-1, incorporation of reduction features applicable to the Project results in a 34-percent reduction in overall VMT and resultant GHG emissions, which is consistent with the GHG reduction strategies provided in the 2020–2045 RTP/SCS. The Project would also be consistent with the following key GHG reduction strategies in SCAG's 2020–2045 RTP/SCS, which are based on changing the region's land use and travel patterns:[117]

- New housing and job growth focused in High Quality Transit Areas (HQTAs);
- Limit total acreage of greenfield or otherwise rural land uses converted to urban use; and
- Reduce VMT per capita.

As discussed above, the Project represents an infill development within an existing urbanized area that would introduce new employment, within an HQTA which is well served by public transportation.[118] Furthermore, the Project VMT per capita would be well below the APC average designated for Project area. The Project would also provide required short- and long-term bicycle parking spaces in compliance with the requirements of the LAMC. These and other measures would further promote a reduction in VMT and subsequent reduction in GHG emissions, which would be consistent with the goals of SCAG's 2020–2045 RTP/SCS.

Increased Use of Alternative Fueled Vehicles Policy Initiative

The second goal of the 2020–2045 RTP/SCS, with regard to individual development projects, such as the Project, is to increase alternative fueled vehicles to reduce per capita GHG emissions.[119] The 2020–2045 RTP/SCS policy initiative focuses on providing charge port infrastructure and accelerating fleet conversion to electric or other near zero-emission technologies.[120] The Project would provide at least 30 percent of the total LAMC-required parking spaces provided to be capable of supporting future EVSE and at least 20 percent of the total LAMC-required parking spaces with EV charging stations.

Energy Efficiency Strategies and Policies

The third important goal within the 2020–2045 RTP/SCS for individual developments, such as the Project, involves improving energy efficiency (e.g., reducing energy consumption) to reduce GHG emissions.[121] The 2020–2045 RTP/SCS goal is to actively encourage and create incentives for energy efficiency, where

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117 SCAG 2020–2045 RTP/SCS, Table 5.1, Connect SoCal Performance Measures and Results.

118 SCAG 2020–2045 RTP/SCS, Exhibit 2.8, Priority Growth Area—High Quality Transit Areas.

119 SCAG, 2020–2045 RTP/SCS.

120 SCAG, 2020–2045 RTP/SCS.

121 SCAG, 2020–2045 RTP/SCS.

possible.[122] As discussed above, the Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen Code.[123,124] These standards would reduce energy and water usage and waste and, thereby, reduce associated GHG emissions and help minimize the impact on natural resources and infrastructure. The sustainability features to be incorporated into the Project would include, but not limited to; high efficiency toilets with a flush volume of 1.28 gallons per flush, or less, high efficiency urinals, and showerheads with a flow rate of 1.5 gallons per minute or less to promote a reduction of indoor and outdoor water use; Energy Star–labeled appliances; and water-efficient landscape design. In addition, the Project would be subject to the 2022 Title 24 standards.

Land Use Assumptions

At the regional level, the 2020–2045 RTP/SCS is a plan adopted for the purpose of reducing GHGs.[125] In order to assess the Project's consistency with the 2020–2045 RTP/SCS, this MND also analyzes the Project's land use characteristics for consistency with those utilized by SCAG in its SCS. Generally, projects are considered consistent with the provisions and general policies of applicable City and regional land use plans and regulations, such as the 2020–2045 RTP/SCS, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. As discussed in Response to Checklist Question XI.b, Land Use and Planning, below, the Project is consistent with the land use goals and principles set forth in the 2020–2045 RTP/SCS that pertain to GHG emissions.

In sum, the Project is the type of land use development that is encouraged by the 2020–2045 RTP/SCS to reduce VMT and expand multi-modal transportation options in order for the region to achieve the GHG reductions from the land use and transportation sectors required by SB 375, which, in turn, advances the State's long-term climate policies.[126] By furthering implementation of SB 375, the Project supports regional land use and transportation GHG reductions consistent with State regulatory requirements.

City of Los Angeles Green New Deal

L.A.'s Green New Deal, a mayoral initiative, includes both short-term and long-term aspirations through the year 2050 in various topic areas, including: water, renewable energy, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality, among others. While not a plan adopted solely to reduce GHG emissions, within L.A.'s Green New Deal, climate change mitigation is one of eight explicit benefits that help define its strategies and goals.

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122 SCAG, 2020–2045 RTP/SCS.

123 City of Los Angeles Municipal Code (LAMC), Chapter IX, Article 9.

124 California Building Standards Commission, 2022 California Green Building Standards Code, California Code of Regulations, Title 24, Part 11, effective January 1, 2023.

125 As part of the state's mandate to reduce per-capita GHG emissions from automobiles and light trucks, the 2020–2045 RTP/SCS presents strategies and tools that are consistent with local jurisdictions' land use policies and incorporates practices to achieve the state-mandated reductions in GHG emissions at the regional level through reduced per-capita vehicle miles traveled. SCAG 2020–2045 RTP/SCS.

126 As discussed above, SB 375 legislation links regional planning for housing and transportation with the GHG reduction goals outlined in AB 32.

Although L.A.'s Green New Deal mainly targets GHG emissions related to City-owned buildings and operations, certain reductions associated with the Project would promote its goals. Such measures include increasing renewable energy usage, reduction of per capita water usage, promotion of walking and biking to work, promotion of high density housing close to major transportation stops, and various recycling and trash diversion goals. The Project would generally be consistent with these goals because it is an infill development within an existing urbanized area that would introduce employment within an HQTA which is well served by public transportation. Furthermore, the Project would comply with CALGreen Code, implement various project design features to reduce energy usage and would comply with the City of Los Angeles Solid Waste Management Policy Plan, the RENEW LA Plan, and the Exclusive Franchise System Ordinance (Ordinance No. 182,986) in furtherance of the targets included in L.A.'s Green New Deal with regard to energy-efficient buildings and waste and landfills. The Project would also provide secure short- and long-term bicycle storage areas, showers and changing areas for Project employees and visitors. Project design would also provide pedestrian access that minimizes barriers and links the Project Site with existing or planned external streets to encourage people to walk instead of drive.

Conclusion

In conclusion, the Project would be consistent with the CARB's Scoping Plan, SCAG's 2020–2045 RTP/SCS and the City's Green New Deal and, therefore, would neither generate GHG emissions that may have a significant impact on the environment nor conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions. Specifically, the Project would not conflict with the emission reduction measures discussed within CARB's Scoping Plan and subsequent updates, particularly their emphasis on the identification of emission reduction opportunities that promote economic growth while achieving greater energy efficiency and accelerating the transition to a low-carbon economy. In addition, as recommended by CARB's Scoping Plan and updates, the Project would use "green building" features consistent with the CALGreen Building Code. As discussed above, the Project would generate only a small number of new vehicle trips that would not result in any VMT impacts and would also not conflict with SCAG's 2020–2045 RTP/SCS. Furthermore, as detailed above, the Project would use LED lighting to minimize use of electricity; high efficiency toilets with a flush volume of 1.28 gallons per flush, or less, high efficiency urinals, and showerheads with a flow rate of 1.5 gallons per minute or less, and to promote a reduction of indoor and outdoor water use; Energy Star–labeled appliances; use native and drought-tolerant plant species in the landscaping to minimize water use and would retain existing EV ready and EV-charging stations to assist in the reduction of GHG emissions from vehicles. In addition, the Project would provide domestic water heating systems located in close proximity to point(s) of use and individual metering and billing for water use. As such, the Project would comply with L.A.'s Green New Deal. Also, shown in Table 9 on page 68, the Project with implementation of Project Design Features would result in a reduction of GHG emissions in comparison to a Project without Project Design Features. The reduction in emissions takes into account measures which comply with the CARB's Scoping Plan and SCAG's 2020–2045 RTP/SCS. In the absence of adopted standards and established significance thresholds, and given this consistency analysis, it is concluded that the Project's impacts related to GHG emissions would be less than significant, and no mitigation measures are required.

Project Design Features

Project Design Feature GHG-PDF-1: The Project applicant would commit to sourcing electricity from the LADWP Green Power program which will supply the Project with 100% renewable energy.

Project Design Feature GHG-PDF-2: The Project applicant would prohibit use of natural gas during Project operations, including restaurant or other uses typically exempt from the City of LA All-Electric ordinance.

IX. HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?	☐	☐	☐	☒
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

The following analysis is based, in part, on the Phase I Environmental Site Assessment (Phase I ESA) prepared for the Project by Haro Environmental dated July 2020; and the Limited Phase II Soil and Soil Vapor Investigation (Phase II ESA) prepared for the Project by Equipoise Corporation dated July 2020. All specific information regarding historic and existing on-site conditions in the discussion below is from these reports unless otherwise noted. The reports are included as Appendix IS-8.1 and 8.2 of this IS/MND.

a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact.

Construction

Typical construction activities during development projects, during demolition, excavation, on-site grading, and building construction, hazardous materials such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and cleaners would be routinely used on the Project Site. However, all potentially hazardous materials used during construction of the Project would be used and disposed of in accordance with manufacturer's specifications and instructions, thereby reducing the risk of hazardous materials use. Additionally, lead results from the field activities indicate that several samples exceed the Soluble Threshold Limit Concentration (STLC) result and will need to be treated as a non-Resource Conservation Recovery Act (RCRA) hazardous waste when excavated and disposed at an appropriately permitted landfill that can accept this waste stream. The Toxicity Characteristic Leading Procedure (TCLP) results were less than 5.0 ug/L, which indicates that if the soils would need be considered a RCRA hazardous waste. The Project would comply with all applicable federal, state, and local requirements concerning the use, storage, disposal, and management of hazardous materials, including, but not limited to the Resource Conservation and Recovery Act, California Hazardous Waste Control Law, Federal and State Occupational Safety and Health Acts, SCAQMD rules, and permits and associated conditions issued by LADBS. These existing regulations are aimed at the amount of hazardous materials used, accident prevention, protection from exposure to specific chemicals, and the proper storage and disposal of hazardous materials. Any associated risk would be adequately reduced to a less-than-significant level through compliance with these standards and regulations. Accordingly, Project construction activities would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials during construction. Impacts would be less than significant, and no mitigation measures are required.

Operation

Operation of the Project would involve the routine use of small quantities of potentially hazardous materials typically used in commercial uses, including cleaning products, paints, and those used for maintenance of landscaping. Such uses would be consistent with that occurring of other commercial developments. However, as with Project construction, all hazardous materials used on the Project Site during operation would be used, stored, and disposed of in accordance with manufacturer's standards and all applicable federal, state, and local requirements, such as California Hazardous Waste Control Law, Federal and California Occupational Safety and Health Acts, the Emergency Planning and Community Right-to-Know Act (Superfund Amendments and Reauthorization Act, Title III), and Safe Drinking Water and Toxic Enforcement Act, and Uniform Fire Code. Therefore, the Project would be in compliance with manufacturer's standards and all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials, impacts associated with the routine transport, use, or disposal of hazardous materials during operation of the Project would be less than significant, and no mitigation measures are required.

b. Would the project 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?

Less Than Significant Impact with Mitigation Incorporated. The current and past land uses within the Project Site were identified as part of the Phase I ESA to assess their potential to present concerns relative to the presence of hazards within the Project Site. These concerns are classified as Recognized Environmental Conditions (RECs), which are defined in Section 1.1.1 of the American Society for Testing and Materials (ASTM) Standard Practice as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release on the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat or a future release to the environment.

As detailed in the Phase I ESA, included in Appendix IS-8.1 of this IS/MND, the Project Site was occupied by single family residences, detached garages, and sheds during the 1800s through approximately 1906. Between 1906 and 1923, the residential structures were removed and a warehouse appeared in the northwest corner while an industrial building appeared in the eastern half of the Project Site. The central area of the Project Site was vacant. By approximately 1938, the northwest corner warehouse had been removed and a railroad spur was built along the southwest portion of the Project Site. Between approximately 1949 through 1963, an auto filling station operated on the east side of the Project Site. Between at least 1950 and 1976, a magazine and paper company occupied a northwestern warehouse, a truck repair shop and parking lot occupied the central portion of the Project Site, and the Blue Diamond Bag Company occupied the eastern building on the Project Site. In 1971, the east half of the Project Site was redeveloped with the current warehouse structures. Since the 1990s, the Project Site has been occupied by packing companies, produce companies, merchant trading, and a trucking company.

An analysis of the potential risk of upset conditions involving the release of hazardous materials associated with the historic, existing, and proposed use of the Project Site is provided below.

Underground and Aboveground Storage Tanks

According to the Phase I ESA, one 10,000-gallon gasoline underground storage tank (UST) was historically located in the eastern parking lot installed in 1954 associated with an auto filling station in that area. No reports exist documenting its removal; however, because the property line at the time extended further east of the current eastern property line, this UST is/was likely located beneath the present-day Wilson Street. As such, the potential is low for this historic feature to present a significant environmental concern to soil, soil vapor, and/or groundwater beneath the Site. In addition, soil vapor sampling performed in 2019 did not detect elevated concentrations of petroleum hydrocarbons.

The former presence of one 10,000-gallon UST and three 550 to 1,000-gallon waste oil USTs located in the central parking lot associated with the historic trucking service. UST removal and sampling activities were performed under the supervision of the Los Angeles Fire Department (LAFD), and the LAFD issued a no further action letter for the USTs. Because the former USTs have been closed by the regulatory agency, these for USTs are considered a historical REC.

At the time of the site reconnaissance, no above-ground storage tanks (ASTs) or USTs were noted on the Project Site with the exception of propane ASTs within the warehouse buildings. Based on the above, the

Project would not exacerbate hazardous conditions related to the risk of upset and accident conditions associated with USTs or ASTs. Impacts would be less than significant, and no mitigation measures are required.

Asbestos-Containing Materials

Asbestos was widely used in the building industry starting in the late 1800s and up until the late 1970s for a variety of uses, including acoustic and thermal insulation and fireproofing, and is often found in ceiling and floor tiles, linoleum, pipes, structural beams, and asphalt. Any building, structure, surface asphalt driveway, or parking lot constructed prior to 1979 could contain asbestos or Asbestos Containing Materials (ACMs). Given the age of the existing structures and the previous uses, ACMs may be present on site. As such, removal of the existing structures during construction of the Project would occur in compliance with applicable regulations and requirements regarding asbestos-containing materials, including in accordance with SCAQMD Rule 1403, which would require that a comprehensive asbestos survey be conducted prior to demolition. In the event that ACMs are found within areas proposed for demolition, suspect materials would be removed by a certified asbestos abatement contractor in accordance with applicable regulations. Overall, with compliance with existing regulatory requirements, Project construction activities would not expose people to a substantial risk resulting from the release of asbestos fibers into the environment. Therefore, with compliance with applicable regulations, the Project would not 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. Impacts would be less than significant, and no mitigation measures are required.

Lead-Based Paint

Lead is a naturally occurring element and heavy metal that was widely used as a major ingredient in most interior and exterior oil-based paints prior to 1950. Lead compounds continued to be used as corrosion inhibitors, pigments, and drying agents from the early 1950s to 1972, when the Consumer Products Safety Commission specified limits on lead content in such products. Given the age of the existing structures and the previous uses, lead-based paints (LBP) may be present on site. In the event that LBP is found within areas proposed for demolition, suspect materials would be removed in accordance with procedural requirements and regulations for the proper removal and disposal of LBP prior to construction activities, including standard handling and disposal practices pursuant to OSHA regulations, under the guidance of a Cal/OSHA-Certified Lead-Related Construction Inspector/Assessor. Example procedural requirements include the use of respiratory protection devices while handling lead-containing materials, containment of lead or materials containing lead on the Project Site or at locations where construction activities are performed, and certification of all consultants and contractors conducting activities involving LBP or lead hazards. Therefore, with compliance with applicable regulations regarding the handling of lead-based products, the Project would not exacerbate environmental hazards related to risk of upset or accident conditions associated with the exposure of LBP to the public or environment. Impacts would be less than significant, and no mitigation measures are required.

Polychlorinated Biphenyls

Typical sources of polychlorinated biphenyls (PCBs) included electrical transformer cooling oils, fluorescent light fixture ballasts, and hydraulic oil. In 1976, the U.S. Environmental Protection Agency (USEPA) banned the manufacture and sale of PCB-containing transformers. Prior to this date, transformers were frequently filled with a dielectric fuel containing PCB-laden oil. Due to their hazardous

properties, all aspects of PCBs are strictly regulated by the USEPA under the Toxic Substances Control Act. These regulations ban the manufacture of PCBs although the continued use of existing PCB-containing equipment is allowed. Transformer oil containing PCBs at a concentration exceeding five parts per million is the California-regulated concentration for hazardous waste though PCBs in in transformer oil at a concentration up to 50 parts per million are currently allowed in transformers in California. The Toxic Substances Control Act also contains provisions controlling the continued use and disposal of existing PCB-containing equipment. As discussed in the Phase I ESA, at the time of the site reconnaissance, no evidence of PCBs was observed onsite. Two electrical transformers were observed within the Project Site and are reportedly used to charge the forklifts. In the event that PCBs are found within the proposed areas for construction, suspect materials would be removed in accordance with all applicable federal, state, and local regulations, such as the Toxic Substances Control Act and California Hazardous Waste Control Law. Therefore, the Project would not exacerbate environmental hazards related to risk of upset or accident conditions associated with exposure of PCBs to the public or environment. Impacts would be less than significant, and no mitigation measures are required.

Oil Wells and Methane

According to the Phase I ESA, there are no oil or gas wells located on or adjacent to the Project Site as provided by the California Geologic Energy Management Division. In addition, based on the City's General Plan Safety Element, the Project Site is not located within an oil field or oil drilling area in the City.[127] The Project Site is also not found to be located within a designated Methane Zone or Methane Buffer Zone mapped by the City.[128] Therefore, the Project would not exacerbate environmental hazards relative to oil wells or methane.

Soil Gas Conditions

A Phase II ESA was conducted to evaluate if there are any subsurface impacts of VOCs or petroleum hydrocarbons from historic operations. Soil vapor samples were proposed for use as a screening mechanism for VOCs as they are generally representative of a larger footprint of the Project Site than soil samples. Soil samples were proposed from borings at multiple depths to provide representative concentrations of subsurface conditions.

Based on the detections of VOCs in soil vapor samples and the detection of one location with STLC exceedance that would be considered as hazardous waste for disposal, follow-up field activities were implemented. As part of the follow-up field activities, a total of six semi-permanent soil vapor probes were installed at depths of approximately 25 and 40 to 50 feet below ground surface. A total of 12 soil vapor samples were collected from the installed probes and analyzed for VOCs using USEPA Test Method TO-15. Soil samples were collected at 1 and 2 feet bgs across eight different locations to delineate lead impacts using USEPA Test Method 6010B. Of these, four samples were tested using STLC and TCLP testing methods of which the total lead concentration exceeded 50 mg/kg. Lastly, soil samples were collected at 1, 2, and 5 feet bgs at six locations to delineate lead impacts, of which 5-foot-deep samples were collected at the five locations where the 2-foot-deep sample had a STLC exceedance. A total of

[127] Los Angeles General Plan Safety Element, November 1996, Exhibit E, Oil Field & Oil Drilling Areas, p. 55.

[128] City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5166-030-008; -009, http://zimas.lacity.org/, accessed November 16, 2023.

23 samples were collected and were analyzed for lead using USEPA Test Method 6010B. One sample was tested using STLC and TCLP methods where the total lead concentration exceeded 50 mg/kg.

Soil vapor results indicate that PCE was the only VOC detected in the soil at a maximum concentration of 4.2 ug/kg at a depth of 5 feet bgs. PCE was detected in 8 of the 34 samples with a range of 1.5–4.2 ug/kg, with the laboratory detection being 1.5 ug/kg. These concentrations are slightly above the laboratory limits. The Phase II ESA determined that PCE impacts in soil vapor within the Project Site is likely the result of vapor intrusion from the adjacent 1910-1914 Bay Street and 1901 Sacramento Street properties. Another potential chemical migration pathway to explain PCE soil vapor beneath the Site is migration of impacted groundwater from an upgradient source, then off-gassing from groundwater into soil vapor beneath the Site and migrating upward through a process known as vapor intrusion. Based on the soil, soil vapor, and groundwater contamination associated with this site, there is an environmental concern to subsurface soil vapor and groundwater conditions beneath the Project Site. As such, the following mitigation measure is proposed. With the implementation of Mitigation Measure HAZ-MM-1, impacts would be less than significant.

Mitigation Measure HAZ-MM-1: The Project shall incorporate an engineered vapor intrusion mitigation system (a sub-slab vapor barrier with vent risers) into the building design to reduce VOC impacts on soil vapor within the Project Site.

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

Less Than Significant Impact. The nearest schools associated with the Project Site are Elementary Community Day School (located 0.2 mile north of the Project Site); Secondary Community Day School (located 0.2 mile north of the Project Site); and Metropolitan Continuation High School (located 0.2 mile north of the Project Site). However, as discussed above, the types and amounts of hazardous materials that would be used in connection with construction of the Project would be typical of those used during construction of commercial developments and would include vehicle fuels, paints, oils, and transmission fluids. Similarly, the types and amounts of hazardous materials used during operation of the proposed uses would be typical of such developments and would include cleaning products, paints, and those used for maintenance of landscaping. Furthermore, all materials used during both the construction and operation of the Project would be used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations including, but not limited to, federal and state Occupational Safety and Health Act requirements, and would not create a significant hazard to nearby schools. Impacts would be less than significant, and no mitigation measures are required.

d. Would the project 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 create a significant hazard to the public or the environment?

No Impact. California Government Code Section 65962.5 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 California Government Code 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 California 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 prepared for the Project Site included as Appendix IS-8.1 of this IS/MND obtained a database search report that documents findings of various federal, state, and local regulatory database searches regarding properties with known or suspected releases of hazardous materials. Based on the database records search, the Project Site is not listed on the applicable databases. Therefore, no impact would occur, and no mitigation measures are 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 or excessive noise for people residing or working in the project area?

No Impact. The Project Site is not located within 2 miles of an airport or within an airport planning area. The closest airport is the Los Angeles International Airport, which is located approximately 11 miles southwest of the Project Site. Given the distance between the Project Site and this airport, the Project would not have the potential to result in a safety hazard or excessive noise for people residing or working near an airport. Therefore, no impact would occur, and no mitigation measures are required.

f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. According to the Safety Element of the City of Los Angeles General Plan, the nearest disaster routes to the Project Site are Alameda Street, which is located west of the Project Site, and the I-10, which is located 0.3 mile south of the Project Site.[129] While it is expected that the majority of construction activities for the Project would be confined to the Project Site, off site construction activities would occur in adjacent street rights-of-way, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would remain open such that at least one travel lane in each direction would be available. In the event of an emergency during construction of the Project, the LAFD and the LAPD would instruct businesses and residents of the area as to the specific evacuation plan as set forth in the Safety Element. The Applicant and construction contractor would comply with all instructions of the LAFD and LAPD as to evacuation requirements. In addition, while operation of the Project would generate traffic in the Project Site vicinity and would result in some modifications to the Project Site's access, the Project would comply with LAFD access requirements and would not impede emergency access in the Project Site vicinity. Therefore, the Project would not physically interfere with or impair the implementation of an emergency evacuation plan. Impacts would be less than significant, and no mitigation measures are required.

g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. The Project Site is located in an urbanized area and there are no wildlands or steep slopes located in the vicinity of the Project Site. The Project is not located within a City-designated Very High

[129] Los Angeles General Plan Safety Element, November 1996, Exhibit H, Critical Facilities and Lifeline Systems, P.61.

Fire Hazard Severity Zone or a City-designated fire buffer zone.[130] [131] Furthermore, the Project would be developed in accordance with LAMC requirements pertaining to fire safety. In particular, LAMC Section 57.106.5.2 provides that the Fire Chief shall have the authority to require drawings, plans, and sketches as necessary to identify access points, fire suppression devices and systems, utility controls, and stairwells; LAMC Section 57.118 establishes LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects; and LAMC Section 57.507.3.1 establishes fire water flow standards. In addition, the Project's proposed commercial uses would not create a fire hazard that has the potential to exacerbate the current environmental condition relative to wildfires. Therefore, the Project would not expose people or structures, directly or indirectly, to a significant risk of loss, injury, or death as a result of exposure to wildland fires. As such, no impact would occur, and no mitigation measures are required.

X. HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
iii. 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; or	☐	☐	☒	☐
iv. impede or redirect flood flows?	☐	☐	☐	☒

[130] City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5166-030-008; -009, http://zimas.lacity.org/, accessed November 16, 2023.

[131] City of Los Angeles, 2018 Local Hazard Mitigation Plan, East Los Angeles APC, Figure 13-3, Wildlife Severity Zones, p. 278.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

The following analysis is based on the Hydrology and Water Resources Technical Report prepared for the Project by KPFF Consulting Engineers, dated September 7, 2023. All specific information on hydrology and water quality in the discussion below is from this report unless otherwise noted. The Hydrology and Water Resources Technical Report is included as Appendix IS-9 of this IS/MND.

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. As discussed below, the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.

Surface Water Quality

Construction

As discussed in the Hydrology and Water Resources Technical Report, construction activities such as earth moving, maintenance of construction equipment, handling of construction materials, and dewatering, can contribute to pollutant loading in stormwater runoff. Additionally, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. However, as the construction site would be greater than one acre, the Project would be required to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) General Construction stormwater permit. In accordance with the requirements of this permit, the Project would implement a site-specific Stormwater Pollution Prevention Plan (SWPPP) that specifies BMPs and erosion control measures to be used during construction to manage runoff flows and prevent pollution. In addition, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC) that require necessary measures, plans, and inspections to reduce sedimentation and erosion.

Based on the above, with compliance with NPDES requirements and City's grading permit regulations, construction of the Project would not result in discharges that would violate any water quality standard or waste discharge requirements or otherwise substantially degrade surface water quality. Impacts would be less than significant, and no mitigation measures are required.

Operation

As discussed in the Hydrology and Water Resources Technical Report, the Project Site lies within the Los Angeles River Watershed. Constituents of concern listed for the Los Angeles River under California's

Clean Water Act Section 303(d) List include cadmium (sediment), trash, coliform bacteria, copper (dissolved), lead, Escherichia (E. Coli), selenium, sediment toxicity, Shellfish Harvesting Advisory, silver, viruses (Enteric), and zinc.

As is typical of most urban developments, stormwater runoff from the Project Site has the potential to introduce pollutants into the stormwater system. Anticipated and potential pollutants generated by the Project include sediment, nutrients, pesticides, metals, pathogens, and oil and grease. Under Section 3.1.3 of the LID manual, post-construction stormwater runoff from new projects must be infiltrated, evapotranspirated, captured and used, and/or treated through high efficiency BMPs on-site for the volume of water produced by the 85th percentile storm event. The Project would incorporate appropriate LID BMPs in accordance with the City's LID Ordinance intended to control and treat stormwater runoff in compliance with LID. As stated in the Hydrology and Water Resources Technical Report, it appears that the Project Site currently discharges without any means of treatment. As such, implementation of LID BMPs as part of the Project would improve existing site conditions. Specifically, the Project would implement an infiltration system to manage and treat stormwater runoff. If infiltration is determined to be infeasible, the Project would install a capture and use system or a biofiltration system. As such, with the implementation of LID BMPs in compliance with the City's LID Ordinance and LID Manual, operation of the Project would not result in discharges that would violate any surface water quality standards or waste discharge requirements. Impacts would be less than significant, and no mitigation measures are required.

Groundwater Quality

Construction

As discussed in the Hydrology and Water Resources Technical Report, groundwater was not observed at a depth of 55 feet below grade and the historic groundwater level in the vicinity of the Project Site was reported at a depth of 145 feet. The Project would include excavations of approximately 11 feet below ground surface. Based on the historically highest groundwater level and depth of proposed excavation, Project construction activities are not expected to encounter groundwater and temporary dewatering may not be required. In the event groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with all applicable NPDES requirements related to construction and discharges from dewatering operations.

During on-site grading and building construction, hazardous materials, such as fuels, paints, solvents, and concrete additives, could be used and would therefore require proper management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the opportunity for hazardous materials releases into groundwater. Compliance with all applicable federal, state, and local requirements concerning the handling, storage, and disposal of hazardous waste, would reduce the potential for the construction of the Project to release contaminants that could percolate into groundwater. In addition, as there are no groundwater production wells or public water supply wells within 1 mile of the Project Site, construction activities would not be anticipated to affect any existing wells. Thus, construction of the Project would not result in any substantial increase in groundwater contamination through hazardous materials releases. Therefore, construction of the Project would not result in discharge that would violate any water quality standard or waste discharge requirements or otherwise substantially degrade groundwater quality. Impacts would be less than significant, and no mitigation measures are required.

Operation

Operational activities which could affect groundwater quality include hazardous material spills and leaking underground storage tanks. As discussed in section IX. Hazards and Hazardous Materials, no underground storage tanks are currently operated or will be operated by the Project. Compliance with all applicable existing regulations at the Project Site regarding the handling and potentially required cleanup of hazardous materials would prevent the Project from affecting or expanding any potential areas of contamination, increasing the level of contamination, or causing regulatory water standards at an existing production well to be violated, as defined in the California Code of Regulations, Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act. Furthermore, operation of the Project would not require extraction from the groundwater supply based on the depth of excavation for the proposed uses and depth of groundwater below the Project Site. Additionally, the Project does not involve drilling to or through a clean or contaminated aquifer. Therefore, Project operations would not result in violations of any water quality standards or waste discharge requirements or otherwise substantially degrade groundwater quality. Impacts would be less than significant, and no mitigation measures are required.

b. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less Than Significant Impact. As provided by the following analysis, the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin.

Construction

No water supply wells are located at the Project Site or within 1 mile of the Project Site that could be impacted by construction, nor would the Project include the construction of water supply wells. As described in Section 2, Project Description, of this IS/MND, the Project would involve excavations approximately 11 feet below ground surface. As previously described, groundwater was not observed at a depth of 55 feet below grade and the historic groundwater level in the vicinity of the Project Site was reported at a depth of 145 feet. As the Project's proposed excavation would not be deeper than the historic high groundwater elevation, temporary dewatering is not expected during construction. If dewatering is required, the Project would comply with all relevant NPDES requirements related to construction and discharges from dewatering operations. Therefore, the Project's temporary construction activities would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. Impacts on groundwater supplies during construction of the Project would be less than significant, and no mitigation measures are required.

Operation

As discussed in the Hydrology and Water Resources Technical Report, the Project Site is approximately 100 percent impervious. With implementation of the Project, the Project Site is expected to maintain the overall percentage of impervious area from the current condition of the Project Site. As such, the potential for groundwater recharge during Project operations would remain minimal. Furthermore, the Project's BMPs would control stormwater runoff with no increase in runoff resulting from the Project. The Project would not include the installation of water supply wells and there are no existing wells or spreading ground

within 1 mile of the Project Site. Therefore, Project operations would not decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. Impacts would be less than significant, and no mitigation measures are required.

c. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i. Result in substantial erosion or siltation on- or off-site;

Less Than Significant Impact.

Construction

The Project Site is not crossed by any water courses or rivers. Construction of the Project would involve the demolition of the three existing warehouse structures and surface parking areas followed by grading and excavation activities. These activities have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. Exposed and stockpiled soils could be subject to erosion and conveyance into nearby storm drains during storm events. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. However, as discussed above, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows from both stormwater and non-stormwater discharges. These BMPs would be designed to contain stormwater or construction watering on the Project Site such that runoff does not impact off-site drainage facilities or receiving waters. In addition, Project construction activities would occur in accordance with City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion. Thus, through compliance with all NPDES General Construction Permit requirements, implementation of BMPs, as well as compliance with applicable City grading permit regulations, construction activities for the Project would not substantially alter the Project Site's drainage patterns in a manner that would result in substantial erosion or siltation on- or off-site. Impacts would be less than significant, and no mitigation measures are required.

Operation

As previously discussed, the Project Site is currently approximately 100 percent impervious. In addition, the area surrounding the Project Site is highly urbanized and is largely covered with impervious surfaces. With implementation of the Project, the Project Site would maintain the overall percentage of impervious area. Accordingly, similar to existing conditions, there would be a minimal potential for erosion or siltation to occur from the exposed soils or large expanses of impervious areas. Therefore, the Project would not substantially alter the Project Site's drainage patterns in a manner that would result in substantial erosion or siltation on- or off-site. Impacts would be less than significant, and no mitigation measures are required.

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

Less than Significant Impact.

Construction

As indicated above, there are no streams or rivers within or immediately surrounding the Project Site. Construction activities for the Project would involve removal of the existing warehouse structures and surface parking areas followed by grading and excavation. These activities have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. As noted above, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows from both stormwater and non-stormwater discharges. These BMPs would be designed to contain stormwater or construction watering on the Project Site such that runoff does not impact off-site drainage facilities or receiving waters. Thus, through compliance with applicable City grading permit regulations, construction activities for the Project would not substantially alter the Project Site drainage patterns in a manner that would result in increased runoff or flooding on- or off-site. Impacts would be less than significant, and no mitigation measures are required.

Operation

As previously discussed, with implementation of the Project, the Project Site would maintain the overall percentage of impervious area (approximately 100 percent). In addition, the Project would comply with the City's LID Ordinance, which requires that post-construction stormwater runoff from new projects must be infiltrated, evapotranspirated, captured and used, and/or treated through high efficiency BMPs on site for the volume of water produced by the greater of the 85th percentile storm event or the 0.75-inch storm event (i.e., "first flush"). Consistent with LID requirements to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site, the Project would include the installation of infiltration BMPs as established by the LID Manual. Therefore, with implementation of BMPs, the Project would not increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Operational impacts associated with flooding from surface runoff would be less than significant, and no mitigation measures are required.

iii. 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; or

Less Than Significant Impact. As detailed in the Hydrology and Water Resources Technical Report, a comparison of the pre- and post-Project peak flow rates indicates that both the existing conditions and implementation of the Project result in a stormwater runoff flow rate of 5.48 cubic feet per second. In addition, the Project Site currently does not have BMPs for the management of pollutants or runoff. The BMPs implemented as part of the Project would control stormwater runoff and ultimately reduce or eliminate the discharge of potential pollutants from stormwater runoff. Furthermore, the Project would not cause flooding during a 50-year storm event or result in a permanent adverse change to the movement of surface water on the Project Site. Therefore, the Project would not 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. Impacts would be less than significant, and no mitigation measures are required.

iv. Impede or redirect flood flows?

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.[132,133] Thus, the Project would not impede or redirect flood flows. No impacts would occur, and no mitigation measures are required.

d. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

Less Than Significant Impact. As discussed above, the Project Site is not located within a 100 year flood hazard area as mapped by FEMA or by the City. In addition, the Project Site is not located within a tsunami hazard area as mapped by the California Geological Survey.[134] Therefore, no tsunami or tsunami events would be expected to impact the Project Site and cause any discharge of pollutants. Additionally, there are no standing bodies of water near the Project Site that may experience a seiche, and therefore there is no significant risk that flows from a seiche could result in the discharge of any pollutants from the Project Site caused by the Project.

Earthquake-induced flooding can result from the failure of dams or other water-retaining structures resulting from earthquakes. According to the General Plan's Safety Element, the Project Site is mapped within an inundation area and the nearest levee is along the Los Angeles River located approximately 0.4 mile east of the Project Site. The U.S. Army Corps of Engineers operates and maintains the 22.5-mile stretch of the Los Angeles River between Lankershim Boulevard in Hollywood and Stuart and Grey Road in Downey, which includes the portion to the east of the Project Site. Their maintenance activities include inspection and cleaning of the channel walls and removing vegetation growing in cracks and joints. In addition, the U.S. Army Corps of Engineers has directed repair of damaged embankments upstream to the Project Site and has installed barriers for those portions of the channel that were identified as at greatest risk of flood waters during the 2015/2016 El Niño storm season. With continued inspection, maintenance and flood control activities, the potential for substantial adverse impacts related to inundation at the Project Site due to proximity to the Los Angeles River. Impacts would be less than significant, and no mitigation measures are required.

e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. Under Section 303(d) of the Clean Water Act, states are required to identify water bodies that do not meet their water quality standards. Biennially, the Los Angeles Regional Water Quality Control Board (LARWQCB) prepares a list of impaired waterbodies in that region, referred to as the 303(d) list. The 303(d) list outlines the impaired waterbody and the specific pollutant(s) for which it is impaired. All waterbodies on the 3030(d) list are subject to the development of a Total Maximum Daily Load (TMDL). As discussed in the Hydrology and Water Resources Technical Report, the Project

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[132] Federal Emergency Management Agency, Flood Insurance Rate Maps, Panel Numbers 06037C1636G, effective December 21, 2018.

[133] City of Los Angeles 2018 Local Hazard Mitigation Plan, Figure 10-2, Mapped Flood Hazard Areas in East Los Angeles APC, p. 207.

[134] California Department of Conservation, California Geological Survey, Los Angeles County Tsunami Hazard Areas, www.conservation.ca.gov/cgs/tsunami/maps/los-angeles , accessed November 16, 2023.

Site is located within the Los Angeles River Watershed. According to the State Water Resources Control Board (SWRCB), constituents of concern listed for the Los Angeles River Watershed under California's Clean Water Act Section 303(d) List include cadmium (sediment), trash, coliform bacteria, copper (dissolved), lead, Escherichia (E. Coli), selenium, sediment toxicity, Shellfish Harvesting Advisory, silver, viruses (Enteric), and zinc.

The County of Los Angeles, the City of Los Angeles, and all other cities in the Los Angeles Watershed are responsible for the implementation of watershed improvement plans or Enhanced Watershed Management Programs (EWMP) to improve water quality and assist in meeting the TMDL milestones. The objective of the EWMP Plan for the Los Angeles River is to determine the network of control measures (often referred to as best management practices) that will achieve required pollutant reductions while also providing multiple benefits to the community and leveraging sustainable green infrastructure practices.

Potential pollutants generated by the Project would be typical of commercial uses and may include sediment, nutrients, pesticides, trash and debris, oil and grease, and metals. The implementation of BMPs required by the City's LID Ordinance would target these pollutants that could potentially be carried in stormwater runoff. Since the existing Project Site does not have any structural or LID BMPs to treat or infiltrate stormwater, implementation of the LID features proposed as part of the Project would result in an improvement in surface water quality runoff as compared to existing conditions. As such, the Project would not introduce new pollutants or an increase in pollutants that could conflict with or obstruct any water quality control plans for the Los Angeles River Watershed. With compliance with existing regulatory requirements and implementation of LID BMPs, the Project would not conflict with or obstruct implementation of a water quality control plan or a sustainable groundwater management plan. Impacts would be less than significant, and no mitigation measures are required.

XI. LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	☐	☐	☒	☐
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

a. Would the project physically divide an established community?

Less Than Significant Impact. The Project Site is located within the highly urbanized Central City North Community Plan area and is currently developed with three warehouse structures and associated surface parking. The area surrounding the Project Site is improved with a range of industrial, residential, and commercial uses contained in low-rise and mid-rise buildings of varying ages.

The Project Applicant is seeking a Vesting Zone Change, pursuant to LAMC Section 12.32Q from M3-1-RIO to [T][Q]M3-2D-RIO to increase floor area to 3.92:1. The proposed uses on the Project Site would be consistent with the mix of uses located adjacent to and in the general vicinity of the Project Site. Additionally, all proposed development would occur within the boundaries of the Project Site and would not include the closure of any surrounding travel routes. Furthermore, the Project does not propose a freeway or other large infrastructure that could divide the existing surrounding community. Access to all surrounding properties would continue to be available upon buildout of the Project. Therefore, the Project would not physically divide an established community.

b. Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact. The following discussion addresses the Project's consistency with the requirements and policies of the various local plans and regulatory documents that guide development on the Project Site and that were adopted at least in part to avoid or reduce the environmental effects of development, including the General Plan Framework Element (Framework Element), Central City North Community Plan, Downtown Los Angeles 2040 Community Plan, City of Los Angeles Municipal Code (Chapter 1 – Planning and Zoning), and Southern California Association of Governments (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Under CEQA, the Project would conflict with an applicable plan if it does not meet the general intent of the plan and/or would obstruct the attainment of the plan's primary goals.[135] As discussed below, the Project would not conflict with any of the applicable plans.

City General Plan Framework Element

The Framework Element establishes the conceptual basis for the City's General Plan by setting forth a Citywide comprehensive long-range growth strategy and defining Citywide policies regarding land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation, infrastructure and public services. The Framework Element land use policies are further guided at the community level through Community Plans and Specific Plans. As detailed in Table 10 on page 98, the Project would be consistent with the applicable goals of the Land Use, Urban Form and Neighborhood Design, Open Space and Conservation, Infrastructure and Public Services, and Economic Chapters of the Framework Element.

The Project would be consistent with, and not conflict with, the relevant objectives and policies that support the goals of the Framework Element's Land Use Chapter as the Project would help provide a diverse commercial development within the community by developing an office building with restaurant and retail uses, which would provide job opportunities and support the needs of existing and future businesses. In addition, the location of the Project further adds to a pattern of existing development consisting of distinct commercial and industrial uses. The Project Site is located in a TPA within close proximity to a variety of bus transit lines and rail lines operated by Metro, and would also provide ample bicycle parking spaces as well as bike storage and locker rooms which would provide opportunities for the use of alternative modes of transportation.

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[135] State Planning and Zoning law (Government Code Section 65000, et seq.); Office of Planning and Research, State of California General Plan Guidelines; *Sequoyah Hills Homeowners Association v. City of Oakland.*

Table 10
Applicable Goals, Objectives, and Policies of the Framework Element

Goal, Objective, or Policy	Would the Project Conflict?
Land Use Chapter	
Goal 3A: A physically balanced distribution of land uses that contributes towards and facilitates the City's long-term fiscal and economic viability, revitalization of economically depressed areas, conservation of existing residential neighborhoods, equitable distribution of public resources, conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, assurance of environmental justice and a healthful living environment, and achievement of the vision for a more livable city. **Objective 3.1:** Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors. **Policy 3.1.4**: Accommodate new development in accordance with land use and density provisions of the General Plan Framework Long-Range Land-Use Diagram and Table 3-1. **Policy 3.1.5**: Identify areas on the Long-Range Land Use Diagram and in the community Plans sufficient for the development of a diversity of uses that serve the needs of existing and future residents (housing, employment, retail, entertainment, cultural/institutional, educational, health, services, recreation, and similar uses), provide job opportunities, and support visitors and tourism.	**No Conflict.** The Project proposes the demolition of the three existing warehouse structures and the development of an office building with restaurant and retail maker spaces. The proposed uses would help provide a diverse commercial development within the community and provide additional opportunities for new commercial development and services. In doing so, the Project would provide job opportunities and support the needs of existing and future businesses. The Project aims to be one of the first net zero carbon office buildings in the City for both operational and embodied carbon, and would include sustainable design features that would minimize the building's energy use and future operational carbon as well as improve the health and wellness of occupants. The Project would incorporate landscaping, open space features, and secure pedestrian access points to ensure pedestrian safety and enhance the livability of the Project Site and surrounding area. The location of the Project further adds to a pattern of existing development consisting of distinct commercial and industrial uses. The Project Site is located in a TPA within close proximity to a variety of bus transit lines and rail lines operated by Metro. As such, the Project would introduce uses consistent with the surrounding area, and would support the needs of existing and future residents, businesses, and visitors in a transit-oriented mixed-use neighborhood of the City. The Project would not conflict with this goal or objective or these policies.
Objective 3.2: Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air pollution. **Policy 3.2.1:** Provide a pattern of development consisting of distinct districts, centers, boulevards, and neighborhoods that are differentiated by their functional role, scale, and character. This shall be accomplished by considering factors such as the existing concentrations of use, community-oriented activity centers that currently or potentially service adjacent neighborhoods, and existing or potential public transit corridors and stations. **Policy 3.2.3:** Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.	**No Conflict.** The Project Site is located within a TPA and is well served by a variety of public transit options, including local and regional bus lines, subway stations, and regional rail service providing ample connections to local and regional bus stations. In particular, the Project Site is located in the vicinity of Metro Bus Lines 60, 62, and 66. The Project Site is also located approximately 1.2 miles from the Metro A Line Washington Station and 1.5 miles from the Metro L Little Tokyo/Arts District Station, which provides connections to regional destinations. The location of the Project further adds to a pattern of existing development consisting of distinct commercial and industrial development near existing or potential public transit corridors and stations. In addition, the Project would also provide a total of 98 bicycle parking spaces consisting of 63 long-term and 35 short term spaces as well as bike storage and locker rooms, and include pedestrian-friendly features such as wayfinding signage and lighting, safety lighting, and separate pedestrian entrances. As such, the Project would provide opportunities for the use of alternative modes of transportation as well as contribute to

Table 10 (Continued)
Applicable Goals, Objectives, and Policies of the Framework Element

Goal, Objective, or Policy	Would the Project Conflict?
	a pattern of development near existing or potential public transit corridors and stations. The Project would not conflict with this objective and policies.
Policy 3.10.4: Provide for the development of public streetscape improvements, where appropriate.	**No Conflict.** The Project would provide new street trees along Sacramento Street adjacent to the open-air lobby, which would improve the pedestrian experience along this street frontage. The proposed outdoor lobby, retail space, and café with outdoor seating areas located on the ground floor would further enhance the streetscape within the vicinity of the Project Site and promote linkages with the surrounding area. The Project would replace the existing two street trees with 12 new street trees inclusive of Engleman Oak trees and Hong Kong Orchid trees. The Project would also incorporate new street and pedestrian lighting within the public right-of-way to provide appropriate and safe lighting levels on both sidewalks and roadways, while minimizing light glare on adjacent properties. Therefore, the Project would not conflict with this policy.
Policy 3.14.4: Limit the introduction of new commercial and other non-industrial uses in the existing commercial manufacturing zones to uses which support the primary industrial function of the location in which they are located.	**No Conflict.** The Project Site is located within the Arts District, which is undergoing rapid transformation from a largely industrial area to incorporate more mixed use residential and commercial uses. 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, the Arts District is expanding south of 6th Street toward the I-10 Freeway with significant growth in mixed-use residential and commercial development. Former industrial and warehouse buildings that have been 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, numerous ground-up residential and commercial developments have been built, are under construction, or are planned throughout the Arts District. While the Project would introduce a new commercial use to the Project Site, the area surrounding the Project Site would remain an industrial zone that is developed with a mixture of commercial uses. Therefore, the Project would not conflict with this policy.
Goal 3L: Districts that promote pedestrian activity and provide a quality experience for the City's residents. **Objective 3.16:** Accommodate land uses, locate and design buildings, and implement streetscape amenities that enhance pedestrian activity.	**No Conflict.** The ground floor of the office building would feature publicly accessible areas including retail space, a café with outdoor seating areas, as well as an outdoor lobby with frontage along Sacramento Street and Wilson Street, which would enhance pedestrian activity. Parking would be provided in an above-ground parking podium tucked toward the rear of the Project Site to maintain the existing streetscape and allow activating uses to front the public street faces. The Project would also enhance the public realm through streetscape improvements and unique

Table 10 (Continued)
Applicable Goals, Objectives, and Policies of the Framework Element

Goal, Objective, or Policy	Would the Project Conflict?
	architectural design materials. Specifically, the Project would provide new street trees and planters along Sacramento Street adjacent to the open-air lobby, which would improve the pedestrian experience along this street frontage. The proposed outdoor lobby, retail space, and café with outdoor seating areas located on the ground floor would further enhance the streetscape within the vicinity of the Project Site and promote linkages with the surrounding area. The activation of streetscape would enhance pedestrian activity on the ground floor and throughout the Project Site. In addition, the open-air lobby would be integrated with vibrant colors, accentuating the visual character of the Sacramento streetscape and further enhancing the pedestrian experience. Furthermore, the Project would incorporate features such as separate pedestrian access paths as well pedestrian lighting and wayfinding signage to further enhance the pedestrian experience and safety of the Project Site. Therefore, the Project would not conflict with this goal or objective.
Urban Form and Neighborhood Design Chapter	
Goal 5A: A liveable [sic] City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and citywide scales.	**No Conflict.** The Project would introduce a new commercial building and would incorporate unique landscaping elements and architectural design materials that draw from the evolving Arts District. Therefore, the Project would attract future investment and would contribute to a transit-oriented mixed-use neighborhood at both the local and citywide scale when considered together with the other mixed-use and commercial developments in the area. Therefore, the Project would not conflict with this goal.
Objective 5.5: Enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm.	**No Conflict.** The area surrounding the Project Site is highly urbanized and is improved with a range of industrial, residential, and commercial uses contained in low-rise and mid-rise buildings of varying ages. Land uses immediately surrounding the Project Site include produce distribution uses to the north; industrial and manufacturing uses to the east across Wilson Street; produce distribution and distribution center uses to the south across Sacramento Street; and various logistics and wholesale uses to the west across Lawrence Street. The Project would upgrade the quality of development within the Project Site by constructing a new office building with restaurant and retail uses, ample open space areas, and landscaping elements. The Project aims to be one of the first Net Zero Carbon office buildings in the City for both operational and embodied carbon, and would include sustainable design features that would minimize the building's energy use and future operational carbon as well as improve the health and wellness of occupants. Furthermore, the Project would enhance the public realm through streetscape improvements and unique architectural design materials that would improve the

Table 10 (Continued)
Applicable Goals, Objectives, and Policies of the Framework Element

Goal, Objective, or Policy	Would the Project Conflict?
	pedestrian experience and promote linkages with the surrounding area. A total of 98 bicycle parking spaces would be provided, including 63 long-term spaces and 35 short-term spaces as well as bike storage and locker rooms. In addition, the Project would incorporate features such as separate pedestrian access paths as well pedestrian lighting and wayfinding signage to further enhance the pedestrian experience and safety of the Project Site. Therefore, the Project would not conflict with this objective.
Objective 5.8: Reinforce or encourage the establishment of a strong pedestrian orientation in designated neighborhood districts, community centers, and pedestrian-oriented subareas within regional centers, so that these districts and centers can serve as a focus of activity for the surrounding community and a focus for investment in the community.	**No Conflict.** As detailed above in response to Objective 5.5, the Project would enhance the public realm through streetscape improvements and unique architectural design materials that would improve the pedestrian experience and promote linkages with the surrounding area. A total of 98 bicycle parking spaces would be provided, including 63 long-term spaces and 35 short-term spaces as well as bike storage and locker rooms. In addition, the Project would incorporate features such as separate pedestrian access paths as well pedestrian lighting and wayfinding signage to further enhance the pedestrian experience and safety of the Project Site. Furthermore, the project would introduce a new commercial building and would incorporate unique landscaping elements and architectural design materials that draw from the evolving Arts District. As such, the Project would serve as a focus of activity for the surrounding community and as a focus of investment in the community. Therefore, the Project would not conflict with this objective.
Policy 5.8.4: Encourage that signage be designed to be integrated with the architectural character of the buildings and convey a visually attractive character.	**No Conflict.** Proposed signage would include mounted Project identity signage, general ground-level and wayfinding pedestrian and vehicular signage, and security markings in compliance with code requirements. Project identity signage would be visible from off-site vehicular and pedestrian traffic and serve as identifiers for the Project. Wayfinding signs would be located at the parking garage entrances and exits, at building lobbies, on the interior-facing faces of stages, and on the ground level throughout the Project Site, and would be integrated into the overall design of the building. In addition, signage would be proposed throughout the Project Site on the exterior of building fronting the public rights-of-way. No digital or off-site signage would be provided. All proposed signage would be designed to be aesthetically compatible with the existing and proposed architecture of the Project Site and would comply with all LAMC and sign ordinances. Therefore, the Project would not conflict with this policy.
Objective 5.9: Encourage proper design and effective use of the built environment to help increase personal safety at all times of the day.	**No Conflict.** The Project would provide proper lighting of the building and walkways to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into the building. The Project would also provide sufficient lighting of parking areas

Table 10 (Continued)
Applicable Goals, Objectives, and Policies of the Framework Element

Goal, Objective, or Policy	Would the Project Conflict?
	to maximize visibility and reduce areas of concealment. Furthermore, the Project would design building entrances and exits, open spaces, and pedestrian walkways to be open and in view of surrounding sites. In addition, the Project would incorporate features such as separate pedestrian access paths as well pedestrian lighting and wayfinding signage to further enhance the pedestrian experience and safety of the Project Site. Therefore, the Project would not conflict with this objective.
Open Space and Conservation Chapter	
Goal 6A: An integrated citywide/regional public and private open space system that serves and is accessible by the City's population and is unthreatened by encroachment from other land uses. **Objective 6.1:** Protect the City's natural settings from the encroachment of urban development, allowing for the development, use, management, and maintenance of each component of the City's natural resources to contribute to the sustainability of the region.	**No Conflict.** The Project would contribute to both the public and private open space system by including several open space areas throughout the ground floor of the Project Site as well as an outdoor amenity deck (Level 7) and rooftop deck (Level 15). More specifically, the Project would include 25,500 square feet of exterior (uncovered) office space, 2,100 square feet of outdoor dining, 10,900 square feet of outdoor amenity deck (Level 7), and 3,000 square feet of rooftop deck (Level 15). Furthermore, the Project would not conflict with the public and private open space system because it would not encroach upon existing open space. The Project is proposed for development on an infill site that is already paved and fully developed and therefore does not contain natural settings; only limited ornamental landscaping and street trees line the perimeter of the Project Site. The Project would contribute to the City's natural resources by increasing the number of trees both on the Project Site and around the perimeter of the Project Site. Specifically, the Project would replace the three existing on-site trees with approximately 12 new trees inclusive of Golden Medallion trees and Fruitless Olive Trees. In addition, the two existing street trees would be replaced with 12 new street trees inclusive of Engleman Oak trees and Hong Kong Orchid trees. None of the existing on- or off-site trees are protected under the City's Protected Tree and Shrub Ordinance No. 186,873. Pursuant to the requirements of the City's Urban Forestry Division and subject to approval of the Board of Public Works, the onsite trees to be removed would be replaced at a 1:1 ratio, and the street trees to be removed would be replaced at a 2:1 basis. Therefore, the Project would not conflict with this goal or objective.
Policy 6.4.8: Maximize the use of existing public open space resources at the neighborhood scale and seek new opportunities for private development to enhance the open space resources of the neighborhoods. b. Encourage the improvement of open space, both on public and private property, as opportunities arise. Such places may include the dedication of "unbuildable" areas or sites that may	**No Conflict.** As discussed above, the Project would contribute to both the public and private open space system by including several open space areas throughout the ground floor of the Project Site as well as an outdoor amenity deck (Level 7) and rooftop deck (Level 15). More specifically, the Project would include 25,500 square feet of exterior (uncovered) office space, 2,100 square feet of outdoor dining, 10,900 square feet of outdoor amenity deck (Level 7), and 3,000 square feet of rooftop deck (Level 15).

Table 10 (Continued)
Applicable Goals, Objectives, and Policies of the Framework Element

Goal, Objective, or Policy	Would the Project Conflict?
serve as green space, or pathways and connections that may be improved to serve as neighborhood	Additionally, the ground floor would include a proposed outdoor lobby, retail space, and café with outdoor seating areas further enhance the streetscape and providing public spaces. Therefore, the Project would not conflict with this policy.
Economic Development Chapter	
Goal 7B: A City with land appropriately and sufficiently designated to sustain a robust commercial and industrial base. **Objective 7.2:** Establish a balance of land uses that provides for commercial and industrial development which meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality. **Policy 7.2.2:** Concentrate commercial development entitlements in areas best able to support them, including community and regional centers, transit stations, and mixed-use corridors. This concentration prevents commercial development from encroaching on existing residential neighborhoods. **Policy 7.2.3:** Encourage new commercial development in proximity to rail and bus transit corridors and stations. **Policy 7.2.4:** Ensure that the City has enough capacity to accommodate the development of general commercial uses which support community needs in all parts of Los Angeles.	**No Conflict.** As previously discussed, the Project proposes the demolition of the three existing warehouse structures and the development of an office building with restaurant and retail uses. The Project would introduce uses that provide a diverse commercial development within the community, thus contributing to the existing employment base and economic development within the community. In addition, the Project has been designed to be one of the first net zero carbon office buildings in the City for both operational and embodied carbon, thereby ensuring maximum feasible environmental quality. The Project Site is located in close proximity to a variety of public transit options, which would contribute to the City's production of new jobs and workspaces in the downtown area. As previously discussed, the location of the Project further adds to a pattern of existing development consisting of distinct commercial and industrial development near existing or potential public transit corridors and stations. Thus, the Project would concentrate development in areas best able to support them, specifically in proximity to rail and bus transit corridors and stations. The Project would not conflict with this goal or objective or these policies.
Goal 7C: A City with thriving and expanding business. **Objective 7.3:** Maintain and enhance the existing businesses in the City. **Policy 7.3.1:** Maintain the Downtown regional core as the preeminent center for office development in the City, the metropolitan area, and the region. Maintenance of this status is key to the City's economic and fiscal strength during the transition to a more service oriented economy.	**No Conflict.** As previously discussed, the proposed office, retail, and restaurant uses would help provide a diverse commercial development within the community and provide additional opportunities for new commercial development and services. In doing so, the Project would provide job opportunities and support the needs of existing and future businesses. In addition, the Project's close proximity to the downtown area would ensure that operation of the Project would maintain the status of the Downtown regional core as the preeminent center for office development in the City, the metropolitan area, and the region. The Project would not conflict with this goal, objective, or policy.
Infrastructure and Public Services Chapter	
Goal 9A: Adequate wastewater collection and treatment capacity for the City and in basins tributary to City-owned wastewater treatment facilities.	**No Conflict.** As discussed under Checklist Question XIX, below, wastewater collection and treatment facilities would be able to adequately serve the Project.

Table 10 (Continued)
Applicable Goals, Objectives, and Policies of the Framework Element

Goal, Objective, or Policy	Would the Project Conflict?
Policy 9.3.1: Reduce the amount of hazardous substances and the total amount of flow entering the wastewater system.	**No Conflict.** Wastewater generated by the Project would be typical of commercial uses. As described above in Checklist Question No. IX, the Project would involve the routine use of small quantities of potentially hazardous materials typically used in commercial uses, including cleaning products, paints, and those used for maintenance of landscaping. Such uses would be consistent with that occurring of other commercial developments. However, activities involving the handling and disposal of hazardous wastes would occur in compliance with all applicable federal, state, and local requirements. In addition, as discussed under Checklist Question No. X, the Project would not violate any water quality standards or waste discharge requirements, or otherwise substantially degrade surface water quality. Furthermore, as discussed under Checklist Question No. XIX.b, the Project would include water conservation features to reduce water usage which would in turn reduce wastewater flows. Water conservation features proposed as part of the Project would include low-flow shower heads, public metering faucets, and kitchen sinks. In addition, the Project would incorporate a drought friendly landscape and irrigation design and would include water meters to measure overall water consumption. Therefore, the Project would not conflict with this policy.
Goal 9B: A stormwater management program that minimizes flood hazards and protects water quality by employing watershed-based approaches that balance environmental, economic and engineering considerations. **Objective 9.6:** Pursue effective and efficient approaches to reducing stormwater runoff and protecting water quality.	**No Conflict.** As evaluated above under Checklist Question No. X, the Project would implement BMPs to minimize the discharge of pollutants in stormwater runoff during construction. During operation, the Project would implement LID strategies to manage stormwater runoff in accordance with the current City of Los Angeles LID Ordinance requirements. The Project would not conflict with this goal or objective.
Goal 9C: Adequate water supply, storage facilities, and delivery system to serve the needs of existing and future residents and businesses. **Objective 9.10:** Ensure that water supply, storage, and delivery systems are adequate to support planned development.	**No Conflict.** As evaluated below for Checklist Question Nos. XIX.a and XIX.b, based on the Project's Water Supply Assessment, LADWP would be able to meet the water demand of the Project as well as the existing and planned future water demands of its service area. Furthermore, the Project would not exceed the available capacity within the distribution infrastructure that would serve the Project Site. Thus, the Project would not conflict with this goal and objective.
Goal 9F: Adequate collection, transfer and disposal of mixed solid waste—the City shall seek to ensure that all mixed solid waste that cannot be reduced, recycled or composted is collected, transferred and disposed of in a manner than minimizes adverse environmental impacts.	**No Conflict.** The Project would provide adequate space for trash and recycling receptacles in order to ensure safe and efficient handling of solid waste. The Project would contract with a private trash hauler that would remove the waste from the building, and the Project would have adequate capacity to handle all trash collection. Therefore, the Project would not conflict with this goal.

Table 10 (Continued)
Applicable Goals, Objectives, and Policies of the Framework Element

Goal, Objective, or Policy	Would the Project Conflict?
Goal 9P: Appropriate lighting required to: (1) provide for nighttime vision, visibility, and safety needs on streets, sidewalks, parking lots, transportation, recreation, security, ornamental, and other outdoor locations; (2) provide appropriate and desirable regulation of architectural and informational lighting such as building façade lighting or advertising lighting; and (3) protect and preserve the nighttime environment, views, driver visibility, and otherwise minimize or prevent light pollution, light trespass, and glare.	**No Conflict.** All lighting would comply with current energy standards and codes while providing appropriate light levels to accent signage, architectural features, and landscaping elements. Light sources would be shielded and/or directed toward Project Site areas to minimize light spill-over to neighboring properties and the surrounding area while utilizing low-level exterior lights at the site perimeter, as needed, for aesthetic, security, and wayfinding purposes. Additionally, new street and pedestrian lighting within the public right-of-way would provide appropriate and safe lighting levels on both sidewalks and roadways, while minimizing light and glare on adjacent properties, in compliance with applicable City regulations and with approval by the Bureau of Street Lighting. Glass in building façades would be selected for qualities such as low reflectivity to reduce glare; energy efficiency to limit solar heat gain; high visibility for adequate light transmission; and acoustic performance to reduce noise from outside. Therefore, the Project would not conflict with this goal.

Source: Eyestone Environmental, 2023.

The Project would be consistent with, and not conflict with, the relevant objectives and policies that support the goals of the Framework Element's Urban Form and Neighborhood Design Chapter as the Project would attract future investment and would contribute to a transit-oriented mixed-use neighborhood at both the local and citywide scale. The Project would also upgrade the quality of development at the Project Site and improve the quality of the public realm by introducing a new development that draws from the evolving Arts District and through incorporating unique architectural design materials and landscaping elements. Furthermore, the Project would incorporate features such as separate pedestrian access paths as well pedestrian lighting and wayfinding signage to enhance the pedestrian experience and safety of the Project Site.

The Project would be consistent with, and not conflict with, the relevant objectives and policies that support the goals of the Framework Element's Open Space and Conservation Chapter by providing a variety of open space areas within the Project Site. In particular, the Project would include 25,500 square feet of exterior (uncovered) office space, 2,100 square feet of outdoor dining, 10,900 square feet of outdoor amenity deck (Level 7), and 3,000 square feet of rooftop deck (Level 15). Landscaping elements and outdoor areas would be provided on the ground floor of the proposed office building and would include outdoor dining areas and an open-air lobby. The Project would implement a detailed materials palette outdoors, that would feature heavy timber and wooden benches, concrete pavers, wood decks, and different planters and trees.

The Project would be consistent with, and would not conflict with, the relevant objectives and policies that support the goals of the Framework Element's Economic Development Chapter as the Project would

introduce uses that provide a diverse commercial development within the community, thus contributing to the existing employment base and economic development within the community.

The Project would be consistent with, and not conflict with, the relevant objectives and policies that support the goals of the Framework Element's Infrastructure and Public Services Chapter, which calls for monitoring service demands and forecasting the future need for infrastructure improvements and implementing techniques that reduce demands on utility infrastructure or services, where appropriate. Specifically, as described above under Checklist Question No. X, the Project would not violate any water quality standards or waste discharge requirements, or otherwise substantially degrade surface water quality. In addition, the Project would implement BMPs to minimize the discharge of pollutants in stormwater runoff during construction and would comply with the LID ordinance during operation of the Project. Furthermore, as discussed below under Checklist Question No. XIX, LADWP would be able to meet the water demand of the Project as well as the existing and planned future water demands of its service area.

In summary, as detailed in Table 10 on page 98, the Project would not conflict with the relevant goals, objectives, and policies of the Framework Element adopted for the purpose of avoiding or mitigating adverse environmental effects, and no mitigation measures would be required.

Central City North Community Plan

The Project Site is located within an area designated as Industrial by the Central City North Community Plan. Specific policies of the Central City North Community Plan apply to land uses, residential development, industrial development, maximum efficiency and accessibility of the commercial sector, and public and institutional land use. The Project's consistency with these policies is set forth in Table 11 on page 107. As discussed therein, the Project would not conflict with the applicable objectives and policies of the Community Plan adopted for the purpose of avoiding or mitigating an environmental effect.

Downtown Los Angeles Community Plan

DTLA 2040 Plan is the ongoing update of the Central City North Community Plan and the Central City Community Plan, whose areas together make up Downtown Los Angeles. The purpose of the DTLA 2040 Plan is to develop and implement a future vision for Downtown Los Angeles and would include policies, plans, and programs that frame the City's long-term priorities. The Project Site has a general plan land use designation of "hybrid industrial.[136] Hybrid industrial areas preserve productive activity and prioritize employment uses, and the buildings typically range from low-rise to mid-rise with light industrial, commercial, and office, with selective live/work units.[137] The Project is consistent with the Hybrid Industrial designation as it would provide approximately 277,700 square feet of office space inclusive of approximately 232,500 square feet of interior office space, approximately 8,000 square feet of restaurant space, and approximately 5,200 square feet of retail space. Additionally, the Project would include approximately 41,500 square feet of outdoor areas throughout the Project Site that include exterior office space, outdoor dining space, a rooftop deck and an outdoor amenity deck. The proposed uses would be located within a 15-story building (maximum height of 232 feet). It is reasonably anticipated that the

[136] City of Los Angeles, DTLA 2040, Draft General Plan Land Use Designation Map.

[137] City of Los Angeles, DTLA 2040 Draft EIR, p. 14

Table 11
Applicable Goals, Objectives, and Policies of the Central City North Community Plan

Goal, Objective, or Policy	Would the Project Conflict?
Commercial	
Goal 2: A strong and competitive commercial sector which best serves the needs of the community through maximum efficiency and accessibility while preserving the historic commercial and cultural character of the district.	**No Conflict.** The proposed office, retail, and restaurant uses would help provide a diverse commercial development within the community and provide additional opportunities for commercial development and services. In addition, the Project would be located in an area designated for commercial and industrial uses, thereby ensuring that the Project would remain consistent with existing uses and development. As such, the Project would contribute to the development of a strong and competitive commercial sector which best serves the needs of the community through maximum efficiency and accessibility, while preserving the historic commercial and cultural character of the district. The Project would not conflict with this goal.
Objective 2-1: To conserve and strengthen viable commercial development in the community and to provide additional opportunities for commercial development and services. **Policy 2-1.1:** Protect commercially planned/zoned areas from encroachment by residential only development. **Policy 2-1.4:** Require that projects be designed and developed to achieve a high level of quality, distinctive character, and compatibility with existing uses and development.	**No Conflict.** The Project would provide approximately 277,700 square feet of office space inclusive of approximately square feet of interior office space and approximately 45,200 square feet of exterior covered office space, as well as approximately 8,000 square feet of restaurant space, and approximately 5,200 square feet of retail space. The proposed office, retail, and restaurant uses would help provide a diverse commercial development within the community and provide additional opportunities for commercial development and services. The Project does not propose any residential uses, and thus would remain consistent with surrounding existing uses and development. The Project has been designed to achieve a high level of quality and distinctive character while remaining compatible with existing uses surrounding the Project Site. Specifically, the Project would incorporate design features such as colored aluminum louvers around the building's façade, while also relying on common industrial materials such as concrete, glass and metal. As such, the Project would conserve and strengthen viable commercial development in the community, protect commercially zoned areas from residential only development, and achieve a high level of quality and compatibility with surrounding uses. The Project would not conflict with this objective or these policies.
Objective 2-2: To attract uses which strengthen the economic base and expand market opportunities for existing and new businesses. **Policy 2-2.2:** New development needs to add to and enhance the existing pedestrian street activity. **Policy 2-2.3:** Require that the first-floor street frontage of structures, including mixed use projects and parking structures located in pedestrian oriented districts, incorporate commercial uses.	**No Conflict.** As previously discussed, the Project would introduce uses that provide a diverse commercial development within the community, thus contributing to the existing employment base and economic development within the community. The ground floor of the office building would feature publicly accessible areas, retail space, a café with outdoor seating areas, as well as an outdoor lobby with frontage along Sacramento Street and Wilson Street, which would activate the streetscape within the vicinity of the Project Site and promote linkages with the surrounding area. This activation of the streetscape would further enhance pedestrian activity along the ground floor and throughout the Project Site. As such, the Project would strengthen the

Table 11 (Continued)
Applicable Goals, Objectives, and Policies of the Central City North Community Plan

Goal, Objective, or Policy	Would the Project Conflict?
	economic base of the community, enhance existing pedestrian street activity, and include commercial uses along the ground floor street frontage. The Project would not conflict with this objective or these policies.
Objective 2-4: To enhance the appearance of commercial districts. **Policy 2-4.2:** Preserve community character scale, and architectural diversity.	**No Conflict.** The Project would be designed to enhance the appearance of the Arts District, provide architectural diversity, and promote a high level of quality within the existing environment. Acknowledging the surrounding context, the Project would rely on common industrial materials such as concrete, glass, and metal, while avoiding the use of cladding or added surface materials. The Project would incorporate unique architectural design materials, including aluminum louvers which would be wrapped around the building's façade, accentuating the character of the building as well as the surrounding area. As such, the Project would serve to enhance the appearance of commercial districts while also preserving community character scale and architectural diversity. The Project would not conflict with this objective or policy.
Industrial	
Goal 3: Sufficient land for a variety of industrial uses with maximum employment opportunities which are safe for the environment and the work force and which have minimal adverse impact on adjacent uses. **Objective 3-1:** To provide for existing and future industrial uses which contribute job opportunities for residents and which minimize environmental and visual impacts to the community. **Policy 3-1.1:** Designate lands for the continuation of existing industry and development of new industrial parks, research and development uses, light manufacturing, and similar uses which provide employment opportunities.	**No Conflict.** The area surrounding the Project Site is highly urbanized and is improved with a range of industrial, residential, and commercial uses contained in low-rise and mid-rise buildings of varying ages. Land uses immediately surrounding the Project Site include produce distribution uses to the north; industrial and manufacturing uses to the east across Wilson Street; produce distribution and distribution center uses to the south across Sacramento Street; and various logistics and wholesale uses to the west across Lawrence Street. The Project Site is also located within the Arts District, which is undergoing rapid transformation from a largely industrial area to incorporate more mixed use residential and commercial uses. While the Project would introduce a new commercial use to the Project Site, the area surrounding the Project Site would remain an industrial zone that is developed with a mixture of commercial uses. Furthermore, the Project would introduce a commercial use that is compatible with the evolving Arts District. Therefore, the Project would not conflict with this goal, objective, or policy.
Policy 3-1.2: Adequate compatibility should be achieved through design treatments, compliance with environmental protections standards and health and safety requirements for industrial uses where they adjoin neighborhoods and commercial uses. **Policy 3-1.3:** Require that any proposed development be designed to enhance and be compatible with adjacent development	**No Conflict.** The Project would incorporate design materials that are compatible with the surrounding industrial uses as well as the evolving Arts District. The Project would rely on common industrial materials such as concrete, glass, and metal, while avoiding the use of cladding or added surface materials to acknowledge the surrounding context. The Project has been designed to be one of the first net zero carbon commercial office buildings in the City for both operational and embodied carbon, and would include sustainable design features that would minimize the

Table 11 (Continued)
Applicable Goals, Objectives, and Policies of the Central City North Community Plan

Goal, Objective, or Policy	Would the Project Conflict?
	building's energy use and future operational carbon as well as improve the health and wellness of occupants. In order to provide articulation and a visually striking frame, the commercial office building would be wrapped in colored, aluminum louvers, which would contrast vibrant colors against the textured grid-work of the underlying concrete structure. Therefore, the Project would not conflict with these policies.
Police Protection	
Policy 8-2.2: Ensure that landscaping around buildings be placed so as not to impede visibility.	**No Conflict.** To facilitate police response in the event of an emergency, the Project would be designed with landscaping that would not impede visibility. The Project would also provide clear access points for entry and exit. The Project would not conflict with this policy.
Policy 8-2.3: Ensure adequate lighting around residential, commercial, and industrial buildings in order to improve security.	**No Conflict.** Light sources would be shielded and/or directed toward Project Site areas to minimize light spill-over to neighboring properties and the surrounding area while utilizing low-level exterior lights at the site perimeter, as needed, for aesthetic, security, and wayfinding purposes. Additionally, new street and pedestrian lighting within the public right-of-way would provide appropriate and safe lighting levels on both sidewalks and roadways, while minimizing light and glare on adjacent properties, in compliance with applicable City regulations and with approval by the Bureau of Street Lighting. The Project would not conflict with this policy.
Fire Protection	
Policy 9-1.1: Coordinate with the Fire Department as part of the review of significant development projects and General Plan Amendments affecting land use to determine the impact on service demands.	**No Conflict.** As provided in Checklist Question No. XV.a, of this Draft MND, the Project has been reviewed by LAFD and LAFD has determined that fire protection services for the Project would be adequate. Compliance with applicable Building and Fire Code requirements would be confirmed as part of LAFD's fire/life safety plan review and fire/life safety inspection, as set forth in LAMC Section 57.118, prior to the issuance of a building permit. Therefore, the Project would not conflict with this policy.
Transportation	
Goal 12: Encourage alternative modes of transportation to the use of single occupant vehicles (SOV) in order to reduce vehicular trips. **Objective 12-1:** To pursue transportation management strategies that can maximize vehicle occupancy, minimize average trip length, and reduce the number of vehicle trips.	**No Conflict.** The Project Site is located in an urban setting that is well served by a variety of public transit options. In particular, the Project Site is located in the vicinity of Metro Bus Lines 60, 62, and 66. The Project Site is also located approximately 1.2 miles from the Metro A Line Washington Station and 1.5 miles from the Metro L Line Little Tokyo/Arts District Station. The Project would provide a total of 98 bicycle parking spaces, including 63 long-term spaces and 35 short-term spaces, as well as bike storage and locker rooms. Additionally, the Project would encourage walking as

Table 11 (Continued)
Applicable Goals, Objectives, and Policies of the Central City North Community Plan

Goal, Objective, or Policy	Would the Project Conflict?
	an alternative mode of transportation by providing 12 new street trees and by providing all new street and pedestrian lighting within the public right-of-way, as described with regard to Policy 8-2.3, above. Therefore, the Project would support the reduction of single-occupant vehicle trips and vehicle miles traveled, and would not conflict with this goal or objective.
Policy 12-1.1: Encourage non-residential development to provide employee incentives for utilizing alternatives to the automobile (i.e., carpools, vanpools, buses, flex time, bicycles, and walking, etc.). **Policy 12-1.3:** Require that proposals for major new non-residential development projects include submission of a TDM Plan to the City.	**No Conflict.** As detailed in Section XVII, Transportation, of this Draft MND, the Project would implement a TDM measures to promote non-auto travel and reduce the use of single-occupant vehicle trips, including bicycle parking facilities, a bicycle repair station, and shower facilities for cyclists. The Project would not conflict with these policies.
Non-Motorized Transportation	
Goal 13: A system of safe, efficient and attractive bicycle and pedestrian facilities. **Policy 13.1.4:** Encourage the provision of changing rooms, showers, and bicycle storage at new and existing and non-residential developments and public places.	**No Conflict.** The Project would include a closed circuit camera system and keycard entry. The Project would provide proper lighting of the building and walkways to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into the building. The Project would also provide sufficient lighting of parking areas to maximize visibility and reduce areas of concealment. The Project would design building entrances and exits, open spaces, and pedestrian walkways to be open and in view of surrounding sites. Furthermore, the Project would also provide a pedestrian access path along Wilson Street and Sacramento Street, which would safely pull pedestrians from the adjacent right-of-way into the Project Site. In addition, the Project would provide a total of 98 bicycle parking spaces, including 63 long-term spaces and 35 short-term spaces, as well as bike storage and locker rooms to encourage bicycle use. The Project would not conflict with this goal or policy.
Historic and Cultural Resources	
Objective 17-1: Ensure that the Community's historically significant resources are protected, preserved, and/or enhanced.	**No Conflict.** As detailed in Checklist Question No. V, Cultural Resources, of this IS/MND, the Historic Resources Technical Report prepared for the Project concluded that the Project is not eligible for listing under federal, state, or local designation criteria, and therefore does not meet the definition of a historical resource under CEQA. In addition, the Project would not result in indirect impacts on nearby historic resources. As such, the Project would not cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5. The Project would not conflict with this objective.

Table 11 (Continued)
Applicable Goals, Objectives, and Policies of the Central City North Community Plan

Goal, Objective, or Policy	Would the Project Conflict?

Source: Eyestone Environmental, 2023.

Project would be generally consistent with the DTLA 2040 Plan's Hybrid Industrial designation. On May 3, 2023, the City Council adopted the DTLA 2040 Plan. The City Attorney will review and finalize the implementing ordinances to ensure clarity of regulations and consistency with State law, which can take approximately six months to a year. After the City Attorney review process is complete, the City Council will consider and vote on the DTLA 2040 Plan implementing ordinances, which if adopted, will then go into effect. Therefore, as the DTLA 2040 Plan is currently under review and subject to change, a finding of consistency with the DTLA 2040 Plan is not necessary and would be speculative.

Los Angeles Municipal Code

As previously discussed, the Project Site is zoned M3-1-RIO (Heavy Industrial, Height District 1, River Implementation Overlay). The M3 designation permits the development of a wide variety of industrial, manufacturing, and storage uses, as well as office and commercial uses, but does not allow for the development of residential uses. The “1” indicates that the Project Site is located in Height District 1, which does not specify a building height limit, but does limit the Floor Area Ratio (FAR) to 1.5 to 1. The River Implementation Overlay (RIO) designation indicates that the Project Site is located within the RIO District.

The Project Site is currently developed with three warehouse structures comprised of 40,479 square feet of floor area and associated surface parking which would be removed as part of the Project. The Project proposes the development of 277,700 square feet of office space, 8,000 square feet of restaurant space, and 5,200 square feet of retail space, resulting in a total floor area of approximately 290,900 square feet and a FAR of approximately 3.92:1 upon completion of the Project.

The Project Applicant is seeking General Plan Amendment pursuant to LAMC Section 11.5.6, to amend footnotes 1 and 6 of the Central City North Community Plan to include the Project Site. Additionally, the Project Applicant is seeking a Vesting Zone Change, pursuant to LAMC Section 12.32Q from M3-1-RIO to [T][Q] M3-2D-RIO to increase floor area to 3.92:1. Pursuant to the authority granted in LAMC Section 12:32, the Project Applicant seeks a Waiver of Improvements to waive the requirement to widen and improve Wilson Street by a variable 6 to 13 feet with a full-length roadway, as well as to waive the requirement to widen and improve Sacramento Street by 3 feet with a full-width roadway. In addition, the Project Applicant is seeking a Site Plan Review pursuant to LAMC Section 16.05 in order to develop a net increase of 50,000 gross square feet of non-residential floor area. With approval of the requested discretionary actions, the Project would be consistent with applicable LAMC requirements.

River Implementation Overlay District

The Project Site is located within the boundaries of the RIO District and would therefore be required to comply with the Los Angeles River Design Guidelines, which establish best practices for designing

development projects located within the RIO District. The Los Angeles River Design Guidelines illustrate options, solutions, and techniques to improve the aesthetic quality of the Los Angeles River and river-adjacent development.[138] Although the Project is located within the boundaries of the RIO District, the Project Site is located approximately 0.4 mile west of the Los Angeles River and is separated from the Los Angeles River by existing roads, buildings and rail tracks. Nevertheless, the Project would support the relevant Objective 2 of the Los Angeles River Guidelines, which calls for employing high quality, attractive and distinguishable architecture and designing the Project in substantial compliance with the Citywide Design Guidelines, as discussed below. Therefore, the Project would not conflict with the RIO District or with the Los Angeles River Design Guidelines.

Citywide Urban Design Guidelines

The Citywide Design Guidelines, adopted on October 24, 2019, establish ten guidelines to carry out the common design objectives that maintain neighborhood form and character while promoting quality design and creative infill development solutions. Although each of the Citywide Design Guidelines should be considered in a project, not all will be appropriate in every case. The Project would not conflict with the Citywide Design Guidelines, as discussed below.

Guideline 1: Promote a safe, comfortable and accessible pedestrian experience for all

As discussed in Section 2, Project Description, of this IS/MND, pedestrian access to the Project Site would be provided via access paths along Sacramento Street, which would safely pull pedestrians from the adjacent right-of-way into the Project Site. The ground floor of the office building would feature publicly accessible areas, retail space, a café with outdoor seating areas, as well as an outdoor lobby with frontage along Sacramento Street and Wilson Street, which would activate the streetscape within the vicinity of the Project Site and promote linkages with the surrounding area. In addition, the open-air lobby would be integrated with vibrant colors, accentuating the visual character of the Sacramento streetscape and further enhancing the pedestrian experience. Thus, the Project would support this guideline.

Guideline 2: Carefully incorporate vehicular access such that it does not degrade the pedestrian experience

As discussed in Section 2, Project Description, of this IS/MND, vehicular access to the Project Site would be provided via a primary driveway off Sacramento Street, with through access to a rear driveway and fire-lane that provides ingress and egress out to Wilson Street. Pedestrian access to the Project Site would be provided via access paths along Sacramento Street, which would safely pull pedestrians from the adjacent right-of-way into the Project Site. Additionally, the proposed outdoor lobby would provide multiple access points for pedestrians along Sacramento Street and Wilson Street. Thus, the Project would support this guideline.

[138] City of Los Angeles Department of City Planning, Los Angeles River Design Guidelines, July 29, 2015; Urban Design Studio, www.urbandesignla.com/resources/RiverDesignGuidelines.php, accessed February 17, 2023.

Guideline 3: Design projects to actively engage with streets and public space and maintain human scale

As described above, the Project would enhance the public realm through streetscape improvements and unique architectural design materials. Specifically, the Project would provide new street trees and planters along Sacramento Street adjacent to the open-air lobby, which would improve the pedestrian experience along this street frontage. The proposed outdoor lobby, retail space, and café with outdoor seating areas located on the ground floor would further enhance the streetscape within the vicinity of the Project Site and promote linkages within the surrounding area. The activation of streetscape would enhance pedestrian activity on the ground floor and throughout the Project Site. In addition, the open-air lobby would be integrated with vibrant colors, accentuating the visual character of the Sacramento streetscape and further enhancing the pedestrian experience. Thus, the Project would support this guideline.

Guideline 4: Organize and shape projects to recognize and respect surrounding context

The Project Site is located within the Central City North Community Plan area. The area surrounding the Project Site is highly urbanized and is improved with a range of industrial uses, residential uses, and commercial uses contained in low-rise and mid-rise buildings of varying age. The surrounding properties are generally zoned as M3, which is consistent with the zoning of the Project Site. Land uses immediately surrounding the Project Site include produce distribution uses to the north across Bay Street; industrial and manufacturing uses to the east across Wilson Street; produced distribution and distribution center uses to the south across Sacramento Street; and various logistics and wholesale uses to the west across Lawrence Street. The Project Site is also located within the Arts District, which is undergoing rapid transformation from a largely industrial area to incorporate more mixed use residential and commercial area. 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, the Arts District is expanding south of 6th Street toward the I-10 Freeway with significant growth in mixed-use residential and commercial development. Former industrial and warehouse buildings that have been 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, numerous ground-up residential and commercial developments have been built, are under construction, or are planned throughout the Arts District. As discussed in Section 2, Project Description, of this IS/MND, the Project would provide approximately 277,700 square feet of office space, approximately 8,000 square feet of restaurant space, and approximately 5,200 square feet of retail space. Acknowledging the surrounding context, the Project would rely on common industrial materials such as concrete, glass, and metal, while avowing the use of cladding or added surface materials. The Project's scale and density would be consistent with development patterns and projected growth in the surrounding area. Thus, the Project would support this guideline.

Guideline 5: Express a clear and coherent architectural idea

As discussed in Section 2, Project Description, of this IS/MND, the Project would be well designed in order to enhance the appearance of the Arts District, provide architectural diversity, and promote a high level of quality within the existing environment. The Project would rely on common industrial materials such as concrete, glass, and metal, while avoiding the use of cladding or added surface materials. In order to provide articulation and a visually striking frame, the building's façade would be wrapped in

colored, aluminum louvers, which would contrast vibrant colors against the textured grid-work of the underlying concrete structure, accentuating the character of the building and function both as a mural and a solar filter, thereby reducing energy use inside the building and improving the comfort of the Project's users.

The Project has been designed to be one of the first net zero carbon office buildings in the City for both operational and embodied carbon, and would include sustainable design features that would minimize the building's energy use and future operational carbon as well as improve the health and wellness of occupants. In particular, the Project has been designed such that twenty percent of the Project's programmed office space would be located in covered outdoor areas, and would rely on natural ventilation, the City's temperate climate, and external shading to minimize the Project's energy uses. Based on the above, the Project would support this guideline.

Guideline 6: Provide amenities that support community building and provide an inviting, comfortable user experience

As described above, the ground floor of the office building would feature publicly accessible areas, retail space, a café with outdoor seating areas, as well as an outdoor lobby with frontage along Sacramento Street and Wilson Street, which would activate the streetscape within the vicinity of the Project Site and promote linkages with the surrounding area. Additionally, the restaurant and retail uses within the would be a desirable public convenience as the uses are in a convenient infill location accessible to nearby workers, residents, and visitors. Landscaping elements and outdoor areas would be provided on the ground floor of the office building. The Project would implement a detailed materials palette that would feature heavy timber and wooden benches, concrete pavers, wood decks, and different planters and trees. Thus, the Project would support this guideline.

Guideline 7: Carefully arrange design elements and uses to protect site users

As discussed in Section 2, Project Description, of this IS/MND, the Project Site is generally bounded by Bay Street to the north, Lawrence Street to the west, Sacramento Street to the south, and Wilson Street to the east. Pedestrian access to the Project Site would be provided via a pedestrian access path along Wilson Street and Sacramento Street, which would safely pull pedestrians from the adjacent right-of-way into the Project Site. Additionally, the proposed outdoor lobby would provide multiple access points for pedestrians along Sacramento Street and Wilson Street. The Project would provide proper lighting of the building and walkways to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into the building. The Project would also provide sufficient lighting of parking areas to maximize visibility and reduce areas of concealment. Furthermore, the Project would design building entrances and exits, open spaces, and pedestrian walkways to be open and in view of surrounding sites. In addition, the Project would incorporate features such as separate pedestrian access paths as well pedestrian lighting and wayfinding signage to further enhance the pedestrian experience and safety of the Project Site. Thus, the Project would support this guideline.

Guideline 8: Protect the site's natural resources and features

The Project Site is located in an urbanized area and is currently occupied by three large warehouse structures and associated surface parking. Existing landscaping within the Project Site is limited. According to the Tree Inventory Report prepared for the Project included in Appendix IS-2 of this IS/MND,

a total of five trees were inventoried, including three on-site trees and two street trees. Street trees and trees within the Project Site consist of various non-native species, including Lemon Bottlebrush and Canary Island Pine. None of the trees inventoried are considered to be protected by the City of Los Angeles Protected Tree and Shrubs ordinance No. 186,873[139,140] Pursuant to the requirements of the City's Urban Forestry Division and subject to approval of the Board of Public Works, the street trees to be removed would be replaced at a 2:1 basis. The Project would replace the existing street trees with approximately 12 new street trees inclusive of Engleman Oak trees and Hong Kong Orchid trees. Thus, the Project would support this guideline.

> Guideline 9: Configure the site layout, building massing and orientation to lower energy demand and increase the comfort and well-being of users

As discussed in Section 2, Project Description, of this IS/MND, the Project has been designed and would be constructed to incorporate environmentally sustainable building features equivalent to Platinum certification under the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED®) Rating System for new construction, and environmentally sustainable building features and construction standards required by the Los Angeles Green Building Code and CALGreen. These features and standards would reduce the Project's energy and water usage and would thereby also reduce the Project's associated greenhouse gas emissions and help minimize its impacts on natural resources and infrastructure. In addition to complying with the City's regulations, the Project also aims to be one of the first net zero carbon office buildings in the City for both operational and embodied carbon. The Project also aims to be certified for International Living Future Institute, Fitwel, and Wiredscore compliance, which would require the Project to incorporate additional decarbonization, environmentally friendly, and health-protective features. Thus, the Project would support this guideline.

> Guideline 10: Enhance green features to increase opportunities to capture stormwater and promote habitat

As discussed above under Checklist Section X, Hydrology and Water Quality, per the Low Impact Development (LID) requirements, as determined by the City of Los Angeles Department of Public Works, Bureau of Sanitation, the Project would include one or more of the following BMPs to treat a "first flush" volume of runoff equal to the greater of an 85th Percentile 24-hour or 0.75-inch rainfall event (in priority order to the maximum extent feasible):

- Infiltration Systems
- Stormwater Capture and Use
- High-Efficient Biofiltration/Bioretention Systems

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139 Carlberg Associates, City of Los Angeles Tree Inventory Report—1811 Sacramento , Los Angeles, California 90021, March 21, 2023. See Appendix IS 2 of this IS/MND.

140 Pursuant to the Ordinance No. 186,873 and as defined in LAMC Section 17.02, a protected tree or shrub includes any of the following Southern California indigenous tree species, which measure four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree, or any of the following Southern California indigenous shrub species, which measure four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the shrub: Oak tree; Southern California Black Walnut tree; Western Sycamore tree; California Bay tree; Mexican Elderberry shrub; and Toyon shrub.

Infiltration is proposed for the Project Site. Site specific percolation testing will be further performed during the design phase of the Project to definitively determine the feasibility of infiltration. Should infiltration not be feasible for the Project Site, other BMP measures would be implemented in accordance with the City's LID requirements. Thus, the Project would support this Guideline.

SCAG Regional Transportation Plan/Sustainable Communities Strategy

SCAG is the federally designated Metropolitan Planning Organization for six Southern California counties, including the County of Los Angeles. As such, SCAG is mandated to create regional plans that address transportation, growth management, hazardous waste management, and air quality. On September 3, 2020, the SCAG Regional Council adopted the 2020–2045 RTP/SCS, also known as Connect SoCal. The 2020–2045 RTP/SCS presents a long-term transportation vision through the year 2045 for the six-county region that includes Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. The 2020–2045 RTP/SCS contains baseline socioeconomic projections that are used as the basis for SCAG's transportation planning, and the provision of services by other regional agencies. SCAG's overarching strategy for achieving its goals is the integration of land use and transportation. SCAG policies are directed toward the development of regional land use patterns that contribute to reductions in single occupancy vehicle use and vehicle miles traveled and improvements to the transportation system. Rooted in past RTP/SCS plans, Connect SoCal's "Core Vision" centers on maintaining and better managing the region's transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and in "complete streets."[141] As detailed in Table 12 on page 117, the Project would not conflict with the applicable goals set forth in the 2020–2045 RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, the Project would support the goals of the 2020–2045 RTP/SCS to maximize the productivity of the region's transportation system as well as protect the environment and health of the region's residents through its location on an urban site in a TPA in close proximity to mass transit options including the Washington Station and Arts District Station located within 1.5 miles of the Project Site, thereby minimizing vehicle miles traveled. In addition, the Project would provide a total of 98 bicycle parking spaces and shower facilities that would serve to promote walking and use of bicycles. In addition, of the Project's 582 parking spaces, 117 spaces would provide Electric Vehicle Charging Stations (EVCS) and 175 spaces would be prewired to accommodate the placement of future EVCS. As such, the Project would maximize mobility and accessibility by providing opportunities for the use of several modes of transportation.

Based on the analysis provided above, the Project would not conflict with the applicable goals, policies, and objectives in local and regional plans that were adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the Project would not conflict with relevant environmental policies in applicable plans. As such, Project impacts with respect to Checklist Question No. XI.b would be less than significant, and no mitigation measures are required.

[141] As defined in SCAG 2020–2045 RTP/SCS, p. 101, complete streets are streets designed and operated to enable safe access for all roadway users of all ages and abilities, including pedestrians, bicyclists, motorists and transit riders. Complete Streets strategies can include traffic calming, bicycle priority streets (bicycle boulevards) and pedestrian connectivity to increase physical activity, improve connectivity to the regional bikeway/greenway networks, local businesses and parks.

Table 12
Applicable Goals of SCAG 2020–2045 RTP/SCS

2020–2045 RTP/SCS Goals	Would the Project Conflict?
Goal 2: Improve mobility, accessibility, reliability, and travel safety for people and goods. **Goal 3:** Enhance the preservation, security, and resilience of the regional transportation system. **Goal 4:** Increase person and goods movement and travel choices within the transportation system	**No Conflict.** Although these goals apply at a regional level, Project development would occur within an existing urbanized area served by an established network of roads and freeways that provide local and regional access to the area, including the Project Site. In addition, the Project Site is well served by a variety of public transit options, and regional rail service providing ample connections to local and regional destinations. In particular, the Project Site is located in the vicinity of Los Angeles County Metropolitan Transit Authority (Metro) Local Bus Lines 60, 62, and 66. The Project Site is also located approximately 1.2 miles from the Metro A Line Washington Station and 1.5 miles from the Metro L Line Little Tokyo/Arts District Station, both of which provide connections to regional destinations. The availability and accessibility of public transit in the Project Site area is documented by the Project Site's location within a designated SCAG High-Quality Transit Area and City of Los Angeles Transit Priority Area, as defined in the City's Zoning Information File No. 2452. In addition, the Project would provide a total of 98 bicycle parking spaces, including 63 long-term spaces and 35 short-term spaces, as well as bike storage and locker rooms which would serve to promote walking and use of bicycles. Given the Project's location in proximity to a variety of transportation options, the Project would maximize mobility and accessibility by providing opportunities for walking and biking and opportunities for the use of alternative modes of transportation, including convenient access to public transit, and would, thereby, enhance the preservation of the regional transportation system and increase person and goods movement and travel choices within the transportation system. Therefore, the Project would not conflict with these goals.
Goal 5: Reduce greenhouse gas emissions and improve air quality. **Goal 6:** Support healthy and equitable communities. **Goal 7:** Adapt to a changing climate and support an integrated regional development pattern and transportation network.	**No Conflict.** As evaluated under Checklist Question No. III, the Project would result in less-than-significant impacts related to air quality during construction and operation. As evaluated under Checklist Question No. VIII, Project impacts with respect to GHG emissions would be less than significant. As also discussed therein, the Project would comply with Los Angeles Green Building Code and CALGreen standards. The Project would be developed on a currently developed Project Site located within an existing urbanized area with an established transportation network of roads, freeways, and transit that provides local and regional access to the area, including the Project Site. Specifically, the Project is an infill development within an existing urbanized area that would introduce employment within a SCAG-designated High Quality Transit Area (HQTA). As discussed above, the Project Site area is served by bus lines operated by the LADOT, including Metro Local Lines 60, 62, and 66. The Project would also promote bicycle use through the provision of 98 bicycle parking spaces, including 63 long-term spaces and 35 short-term spaces, as well as bike storage and locker

Table 12 (Continued)
Applicable Goals of SCAG 2020–2045 RTP/SCS

2020–2045 RTP/SCS Goals	Would the Project Conflict?
	rooms. The Project also includes multiple pedestrian-friendly features both within the Project Site and along its perimeter, including pedestrian-friendly features such as wayfinding signage and lighting, safety lighting, and separate pedestrian entrances. In addition, the Project would provide landscaping and trees throughout the site and streets to provide a pedestrian-friendly environment. The Project would remove the three existing on-site trees with 12 new trees inclusive of Golden Medallion trees and Fruitless Olive trees. In addition, the two existing street trees would be replaced with 12 new street trees inclusive of Engleman Oak trees and Hong Kong Orchid trees. The Project would comply with provisions of the City's Urban Forestry Division and the Protected Trees and Shrubs Ordinance. Therefore, the Project would support healthy and equitable communities by improving air quality and encouraging active transportation. The Project would support the reduction of vehicle miles traveled and dependency on single-occupancy vehicles with the implementation of TDM measures. As such, the Project would not conflict with the region's adaptation to a changing climate and would support an integrated regional development pattern and transportation network. Therefore, the Project would not conflict with these goals.
Goal 8: Leverage new transportation technologies and data-driven solutions that results in more efficient travel.	**No Conflict.** As discussed above, the availability and accessibility of public transit in the Project area are driven by the Project Site's location within a designated TPA as defined in PRC Section 21099. In addition, the Project would provide 98 bicycle spaces, including 63 long-term and 35 short-term, and would include bike storage and locker rooms would serve to promote walking and use of bicycles. The Project would also provide 117 parking spaces that are equipped with EVCS and 175 parking spaces prewired to support future EVCS. Therefore, the Project would not conflict with this goal.
Goal 10: Promote conservation of natural and agricultural lands and restoration of habitats.	**No Conflict.** The Project Site is located in an urbanized area and is currently developed with three warehouse structures and associated surface parking. The Project would remove the three existing on-site trees and two street trees, none of which are protected trees under the City's Protected Tree and Shrubs Ordinance No. 186,873. Pursuant to the requirements of the City's Urban Forestry Division and subject to approval of the Board of Public Works, the onsite trees to be removed would be replaced at a 1:1 ratio, and the street trees to be removed would be replaced at a 2:1 basis. The Project would replace the on-site trees with approximately 12 new trees inclusive of Golden Medallion trees and Fruitless Olive trees. In addition, the existing street trees would be replaced with 12 new street trees inclusive of Engleman Oak trees and Hong Kong Orchid trees. No riparian or other sensitive natural community exists on-site, and no agricultural uses or operations occur on-site or in the

Table 12 (Continued)
Applicable Goals of SCAG 2020–2045 RTP/SCS

2020–2045 RTP/SCS Goals	Would the Project Conflict?
	vicinity. The Project Site and surrounding area are not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance by the California Department of Conservation. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area as defined by the City of Los Angeles. Accordingly, development of the Project would not preclude the conservation of natural and agricultural lands and restoration of habitats. Thus, the Project would not conflict with this goal.
Source: Eyestone Environmental, 2023.	

XII. MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

a. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

b. Would the project 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?

No Impact. No mineral extraction operations currently occur on the Project Site. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present, or within a mineral producing area as classified by the California Geologic Survey.[142,143] The Project Site is also not located within a City-designated oil field or oil drilling

[142] City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995. Figure GS-1.

[143] State of California Department of Conservation, California Geologic Survey, Aggregate Sustainability in California, 2018.

area.[144] Therefore, the Project would not create any impact regarding the loss of availability of a mineral resource or a mineral resource recovery site, and no mitigation measures would be required.

XIII. NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c. For a project located within the vicinity of a private airstrip or 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?	☐	☐	☐	☒

a. Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant Impact. The following analysis evaluates the potential noise impacts at noise-sensitive land uses resulting from construction and operation of the Project.

Applicable Noise Regulations

Chapter XI, *Noise Regulation*, of the LAMC (hereafter referred to as the Noise Regulations) establishes acceptable ambient sound levels to regulate intrusive noises (e.g., noise from stationary mechanical equipment, amplified sound, and vehicles other than those traveling on public streets) within specific land use zones. In accordance with the Noise Regulations, a noise level increase from certain regulated noise sources (e.g., mechanical equipment) of 5 dBA over the existing ambient noise level at an adjacent property line is considered a violation of the Noise Regulations. To account for people's increased tolerance for short-duration noise events, the Noise Regulations provide a 5-dBA allowance (for a total of 10 dBA[145] above the existing ambient noise level) for noise sources occurring for more than 5 but less

[144] City of Los Angeles Department of Public Works, Bureau of Engineering, NavigateLA, http://navigatela.lacity.org/navigatela, accessed November 16, 2023.

[145] A-weighted decibels, abbreviated dBA, are an expression of the relative loudness of sounds in air as perceived by the human ear. All sound levels measured in decibel (dB or dBA), as identified in the noise calculation worksheets included in Appendix 10 of this IS/MND, are relative to $2x10^{-5}$ N/m^2. Caltrans, Technical noise Supplement (TeNS), September 2013,
(Footnote continued on next page)

than 15 minutes in any 1-hour period, and an additional 5-dBA allowance (for a total of 15 dBA above the existing ambient noise level) for noise sources occurring for five minutes or less in any 1-hour period.[146]

Ambient noise is defined by the Noise Regulations as the measured noise level averaged over a period of at least 15 minutes (i.e., L_{eq}).[147,148] For purposes of determining whether or not a violation of the Noise Regulations is occurring, the sound level measurements of the additional noise source are averaged over a minimum 15-minute duration and compared with the baseline ambient noise levels (i.e., without the additional noise source). The ambient noise baseline to be used is either the actual measured ambient noise level or the City's presumed ambient noise level, whichever is greater. In cases in which the actual measured ambient noise level is unknown, the City's presumed ambient noise level is used as the baseline. The City's presumed daytime (7:00 A.M. to 10:00 P.M.) and nighttime (10:00 P.M. to 7:00 A.M.) minimum ambient noise levels for the M3 zone is 65 dBA and 65 dBA, respectively.[149]

Noise due to construction is regulated under Section 41.40 of the LAMC, which prohibits construction noise between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, on Saturday before 8:00 A.M. and after 6:00 P.M., and at any time on Sunday or a national holiday.[150] In addition, Section 112.05 of the LAMC limits noise from construction equipment located within 500 feet of a residential zone to 75 dBA (between 7:00 A.M. and 10:00 P.M.), measured at a distance of 50 feet from the source, unless compliance with this limitation is technically infeasible.[151]

Noise due to motor driven vehicles on private property (e.g., parking lot) is regulated under Section 114.02 of the LAMC. In accordance with Section 114.02, the operation of motor driven vehicles upon any property within the City that causes the noise level on the premises of any occupied residential property to exceed the ambient noise level by more than 5 dBA is considered a noise violation.

Existing Noise Environmental

Some land uses are considered more sensitive to noise than others based on the types of activities typically involved at the receptor location. Similarly, the Noise Element defines noise-sensitive land uses

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Chapter 2.1.3.2. https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tens-sep2013-a11y.pdf]

146 Los Angeles Municipal Code, Chapter XI, Article I, Section 111.02-(b). https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-193741

147 Los Angeles Municipal Code, Chapter XI, Article I, Section 111.01(a). https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-193741

148 Equivalent Sound Level (L_{eq}) is a measurement of the acoustic energy content of noise averaged over a specified time period. Thus, the L_{eq} of a time-varying sound and that of a steady sound are the same if they deliver the same amount of energy to the receptor's ear during exposure. Caltrans, Technical noise Supplement (TeNS), September 2013, Table 2-11. https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tens-sep2013-a11y.pdf]

149 Los Angeles Municipal Code, Chapter XI, Article I, Section 111.03. https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-193741

150 Los Angeles Municipal Code, Section 41.40. https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-128777#JD_41.40.

151 In accordance with the City of Los Angeles Noise Regulations (Los Angeles Municipal Code, Section 112.05), "technically infeasible" means that said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques during the operation of the equipment.

as single-family and multi-unit dwellings, long-term care facilities (including convalescent and retirement facilities), dormitories, motels, hotels, transient lodging, and other residential uses; houses of worship; hospitals; libraries; schools; auditoriums; concert halls; outdoor theaters; nature and wildlife preserves; and parks.[152] Based on a review of the land uses in the Project Site area, there are no noise sensitive uses within 500 feet of the Project Site. However, there is a potential future noise sensitive uses (i.e., mixed-use developments with residential uses) located at the northeast corner of Mateo Street and Sacramento Street (approximately 635 feet east of the Project Site), which is more than 500 feet from the Project Site. In addition, there is potential future studios development at 8th and Alameda Street (approximately 545 feet south of the Project Site). The locations of these two potential future noise-sensitive receptors and an existing high school (located at the northwest corner of Wilson Street and 7th Place) are identified in Figure 9 on page 123 as R1 through R3, and described in Table 13 on page 124.

Ambient noise measurements were taken at the three selected off-site noise sensitive receptors on March 2, 2023, using a Larson-Davis Model 870 Integrating/Logging Sound Level Meters. Two 15-minute measurements were conducted at each of the off-site receptor locations, one during the daytime hours (between 10:00 A.M. and 12:00 P.M.) and one during the nighttime hours (between 10:00 P.M. and 12:00 A.M.). The ambient noise measurements were taken in accordance with the City's standards, which require ambient noise to be measured over a period of at least 15 minutes.

The results of the ambient sound measurement data are summarized in Table 13. As indicated in Table 13, the existing daytime ambient noise levels surrounding the Project Site ranged from 65.6 dBA (L_{eq}) at potential future receptor R2 to 66.9 dBA (L_{eq}) at potential future receptor R1. The nighttime ambient noise levels ranged from 59.8 dBA (L_{eq}) at receptor R3 to 63.8 dBA (L_{eq}) at receptor potential future R1. Based on field observation and measured sound data, the current ambient noise environment in the vicinity of the Project Site is controlled primarily by vehicular traffic on local roadways (i.e., Alameda Street, Mateo Street, and Sacramento Street) and industrial noise sources. Consistent with LAMC procedures, the measured existing ambient noise levels are used as the baseline conditions for the purposes of determining Project impacts.

Construction Noise

Construction noise impacts due to on-site construction activities associated with the Project were evaluated by calculating the construction-related noise levels at the closest future potential sensitive receptor locations and comparing these estimated construction-related noise levels to the existing ambient noise levels (i.e., noise levels without construction noise from the Project). Construction noise associated with the Project was estimated based on the noise expected to be generated by the different types of Project construction activities, calculating the anticipated noise levels to be produced by the mix of the Project's construction equipment assumed for all construction activities at the two future potential sensitive receptor locations, construction durations, and construction schedule. Project construction is anticipated to commence in 2024 and be completed in 2026. Project construction activities would comply with LAMC Section 41.40, which limits construction to the hours of 7:00 A.M. to 9:00 P.M. Monday through Friday, 8:00 A.M. to 6:00 P.M. on Saturday, and no construction activities on Sunday or a national holiday.

[152] City of Los Angeles General Plan, Noise Element, Chapter IV, Page 4-1. https://planning.lacity.org/odocument/b49a8631-19b2-4477-8c7f-08b48093cddd/Noise_Element.pdf

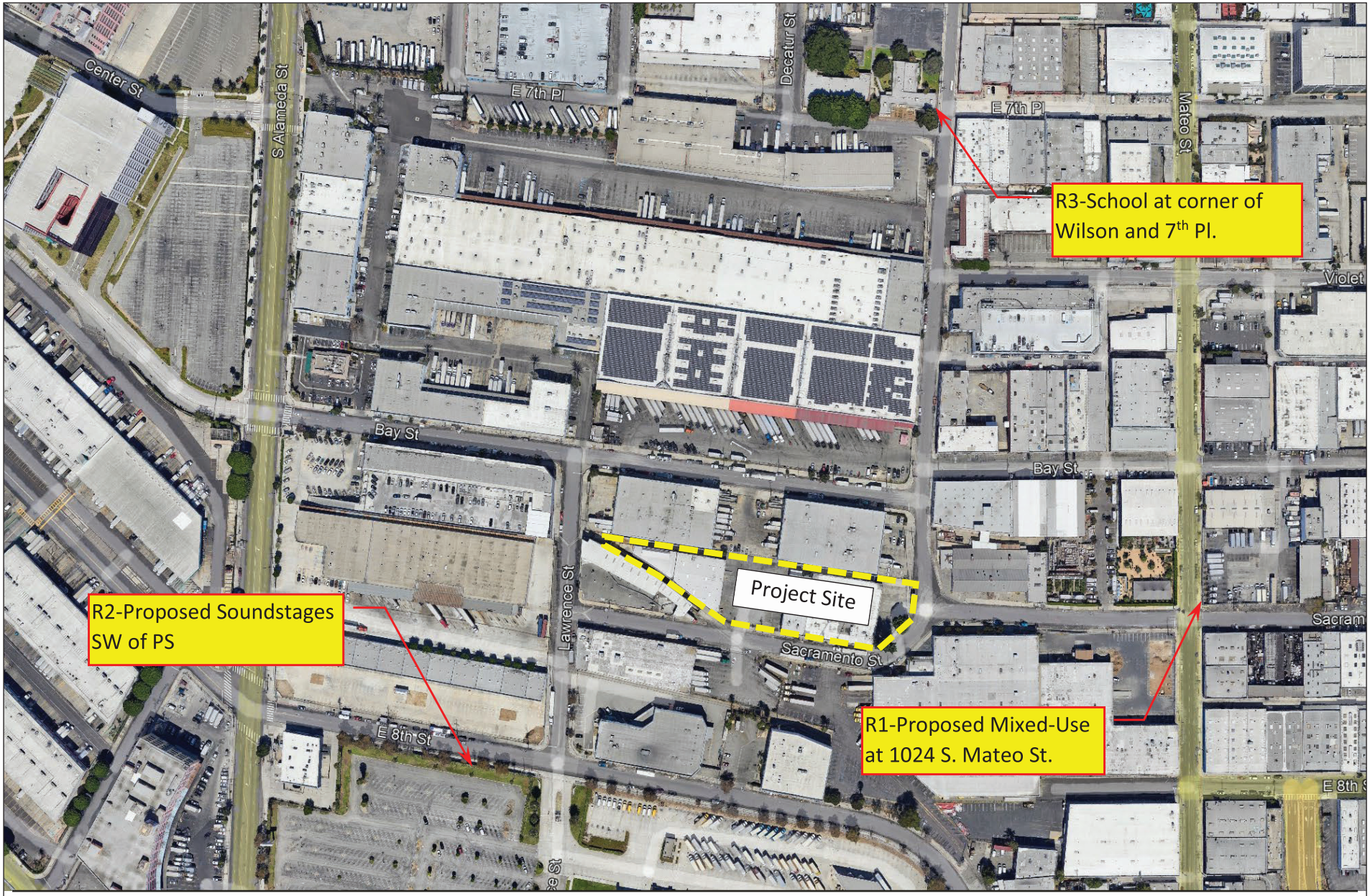

Figure 9
Noise Monitoring Locations

Source: AES, 2023.

Table 13
Existing Ambient Noise Levels

Receptor Location	Approximate Distance to Project Site[a] (feet)	Measured Noise Levels, dBA L_{eq}		CNEL[c] (dBA)
		Daytime Hours[b] (7:00 A.M.–10:00 P.M.)	Nighttime Hours[b] (10:00 P.M.–7:00 A.M.)	
R1 Proposed mixed-use development at 1024 South Mateo Street, east of the Project Site	635	66.9	63.8	69.3
R2 Proposed studios development at 8th and Alameda, southwest of the Project Site.	545	65.6	63.4	68.6
R3 Metropolitan High School at the northwest corner of Wilson Street and 7th Place, north of the Project Site	990	66.3	59.8	66.7

CNEL = Community Noise Equivalent Level

dBA = A-weighted sound pressure level in decibel

L_{eq} = equivalent sound level

[a] *Distances shown are estimated using Google Earth and are referenced to the nearest boundary of the Project Site.*

[b] *The range of hours for the daytime and nighttime periods shown herein are defined by the LAMC. For receptor locations R1 through R3, daytime ambient noise levels were measured between 10:00 A.M. and 12:00 P.M., and the nighttime ambient noise levels were measured between 10:00 P.M. and 12:00 A.M.*

[c] *Estimated based on short-term (15-minute) noise measurements per FTA procedures.*

Source: AES, 2023.

On-Site Construction

Individual pieces of construction equipment anticipated to be used for Project construction produce maximum noise levels of 74 dBA to 90 dBA at a reference distance of 50 feet from the noise source, as shown in Table 14 on page 125. The construction equipment noise levels at a distance of 50 feet (Referenced Maximum Noise Levels) are based on the Federal Highway Administration (FHWA) Roadway Construction Noise Model User's Guide (RCNM, 2006), which is a technical report containing actual measured noise data for construction equipment.[153] These maximum noise levels would occur when equipment is operating under full power conditions (i.e., the equipment engine at maximum speed). However, equipment used on a typical construction site often operates under less than full power conditions, or part power. To more accurately characterize construction-period noise levels, the average (Hourly L_{eq}) noise level associated with each construction stage is calculated based on the quantity, type,

[153] Federal Highway Administration, FHWA Roadway Construction Noise Model User's Guide, January 2006, https://ntlrepository.blob.core.windows.net/lib/49000/49100/49175/rcnm.pdf.

Table 14
Construction Equipment Noise Emission Reference Levels and Usage Factors

Type of Equipment	Acoustical Usage Factor (percent)	Reference Maximum Noise Levels at 50 Feet[a] L_{max} (dBA)
Air Compressor	40	78
Cement and Mortar Mixer	50	80
Compactor	20	83
Concrete Mixer Truck	40	79
Concrete Saw	20	90
Crane	16	81
Drill Rig	20	84
Forklift	10	75
Generator	50	81
Dump/Haul Truck	40	76
Excavator	40	81
Pump	50	81
Roller	20	80
Rubber Tired Loader	40	79
Tractor/Loader/Backhoe	40	80
Delivery Truck	40	74
Welders	40	74

dBA = A-weighted sound pressure level in decibel

L_{max} = maximum sound level

[a] *Construction equipment noise levels are based on FHWA RCNM.*

Source: FHWA Roadway Construction Noise Model User's Guide, Table 1, 2006.

and usage factors for each type of equipment that would be used during each construction stage.[154] These noise levels are typically associated with multiple pieces of equipment operating simultaneously. Therefore, the construction noise levels at the sensitive receptor locations were calculated based on the standard point source noise-distance attenuation factor of 6.0 dBA for each doubling of distance.[155] Additional noise attenuation was assigned as the line-of-sight to the Project Site would be interrupted by the presence of existing intervening structures.[156]

[154] Pursuant to the FHWA Roadway Construction Noise Model User's Guide, 2006, page 7, the usage factor is the percentage of time during a construction noise operation that a piece of construction is operating at full power, https://ntlrepository.blob.core.windows.net/lib/49000/49100/49175/rcnm.pdf.

[155] Caltrans, Technical noise Supplement (TeNS), September 2013, Chapter 2.1.4.1. https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tens-sep2013-a11y.pdf

[156] Caltrans, Technical noise Supplement (TeNS), September 2013, Figure 2-15. https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tens-sep2013-a11y.pdf

Table 15 on page 127 provides the estimated on-site construction noise levels at the offsite noise sensitive receptors for the various construction phases. As indicated- in Table 15, the estimated construction noise levels at the off-site noise sensitive receptors would be below the existing ambient noise levels, and thus, would not exceed the 5-dBA over the ambient noise level significance criteria. Therefore, the Project's potential noise impacts due to on-site construction would be less than significant, and no mitigation is required.

Off-Site Construction Traffic

In addition to on-site construction noise, the Project would generate mobile noise from delivery/haul trucks and construction workers traveling to and from the Project Site during the Project's construction. As discussed in Section 2, Project Description, of this IS/MND, construction delivery/haul trucks would travel on approved truck routes between the Project Site and the Santa Monica Freeway (I-10). Incoming trucks would travel from the I-10, exit onto 8th Street, heading west, turn right onto Mateo Street, turn left onto Sacramento Street to the Project site. Departing trucks would exit the Project site onto Sacramento Street, heading east, turn right onto Mateo Street, heading south, turn left onto Porter Street, heading east, and onto the I-10 Freeway. Currently, there are no sensitive uses along the anticipated haul routes. However, the potential receptor R1 is located at the northeast corner of Sacramento Street and Mateo Street, which could be exposed to construction trucks, if it is built and occupied during the Project construction.

Noise levels from construction trucks would be higher than those of construction workers vehicles. Therefore, the noise impacts are based on the construction trucks. Table 16 on page 128 provides the estimated number of construction-related truck trips and the estimated noise levels along the anticipated truck route. As indicated in Table 3, the estimated off-site construction noise levels would be below the significance criteria along the anticipated haul routes. Therefore, the Project's potential off-site construction traffic noise impacts would be less than significant, and no mitigation is required.

Table 15
Construction Noise Levels

Receptor Location	Calculated Construction Noise Levels by Construction Phases, (L_{eq} (dBA))						Existing Daytime Ambient Noise Levels (L_{eq} (dBA))	Significance Criteria (L_{eq} (dBA))[a]	Maximum Noise Exceedance Above the Criteria (L_{eq} (dBA))	Significant Impact?
	Demolition	Grading/ Excavation	Mat Foundation	Building Foundation	Building Construction	Paving/ Landscaping				
R1	63.6	61.8	58.6	58.6	57.2	59.4	66.9	71.9	0.0	No
R2	59.8	57.9	54.8	54.8	53.4	55.7	65.6	70.6	0.0	No
R3	50.1	48.3	45.0	45.0	43.6	45.7	66.3	71.3	0.0	No

[a] *Significance criteria equal to existing daytime ambient plus 5 dBA.*
Detail calculation worksheets are included in Appendix IS-10 of this IS/MND.

Source: AES, 2023.

Table 16
Off-Site Construction Truck Noise Levels

Construction Phase	Estimated Number of Construction Truck Trips per Day	Estimated Number of Construction Truck Trips per Hour[a]	Estimated Truck Noise Levels Plus Ambient Along the Project Truck Routes,[b] (L_{eq} (dBA)) (Project/Project + Ambient)	
			Sacrament Street	Mateo Street
Demolition	26	5	57.6/67.4	58.5/67.5
Grading/Excavation	96	16	62.7/68.3	63.5/68.5
Mat Foundation	150	13	61.8/68.1	62.6/68.3
Building Foundation	50	7	59.1/67.6	59.9/67.7
Building Construction	110	14	62.1/68.1	63.0/68.4
Paving/Landscape	24	3	55.4/67.2	56.3/67.3
Existing Daytime Ambient Noise Levels along the Project Haul Routes,[c] L_{eq} (dBA)			66.9	66.9
Significance Criteria,[d] L_{eq} (dBA)			71.9	71.9
Maximum Noise Exceedance Above the Criteria, L_{eq} (dBA)			0.0	0.0
Significant Impact?			No	No

[a] *Haul truck hourly trips are based on 6-hour per day. Concrete trucks during mat foundation are based on 12-hour per day. Other delivery trucks are based on 8-hour per day.*

[b] *Noise levels include Project-related truck trips plus ambient.*

[c] *Ambient noise levels along Sacramento Street and Mateo Street are based on measured ambient at nearby receptor locations, i.e., ambient at receptor location R1.*

[d] *Significance criteria are equivalent to the measured ambient noise levels plus 5 dBA.*

Detail calculation worksheets are included in Appendix IS-10 of this document.

Source: AES, 2023.

Operation Noise

Noise associated with Project operation would include: (a) on site stationary source noise, including outdoor mechanical equipment (e.g., HVAC equipment), parking facilities, and activities within the proposed outdoor spaces; and (b) off-site mobile source (roadway traffic) noise.

On-Site Operational Noise

Mechanical Equipment

The Project would include new air conditioning mechanical equipment (e.g., air ventilation equipment), which would be located at the roof level of the new building. Project-related outdoor mechanical equipment would be designed to comply with the City's Noise Regulations (Section 112.02 of the LAMC) to ensure that it would not increase the existing ambient noise levels by 5 dBA. Table 17 on page 129

Table 17
Mechanical Equipment Noise Levels

Receptor Location	Existing Ambient Noise Levels, dBA (L_{eq})	Estimated Noise from Project Mechanical Equipment, dBA (L_{eq})	Ambient + Project Noise Levels, dBA (L_{eq})	Significance Threshold,[a] dBA (L_{eq})	Exceedance over Significance Criteria	Sig. Impact?
R1	63.8	63.8	0.0	41.7	68.8	No
R2	63.4	63.4	0.0	43.2	68.4	No
R3	59.8	59.9	0.1	43.3	64.8	No

[a] *Significance thresholds are equivalent to the measured daytime or nighttime ambient noise levels, whichever is lower plus 5 dBA.*

Detail calculation worksheets are included in Appendix IS-10 of this document.

Source: AES, 2023.

presents the estimated on-site mechanical equipment noise levels associated with this equipment at the off-site receptor locations. As shown on Table 17, the estimated noise levels from the mechanical equipment would be well below the existing ambient noise levels. As such, the Project's noise levels due to the mechanical equipment at the off-site receptor locations would be below the significance threshold of 5 dBA (L_{eq}) above existing ambient noise levels. Therefore, noise impacts from the Project's mechanical equipment would be less than significant, and no mitigation is required.

Outdoor Spaces

The Project would include outdoor areas throughout the Project Site, including the outdoor dining areas and an open-air lobby at the ground floor and exterior (uncovered) office spaces, balconies on the upper levels (3 through 14), and outdoor amenity deck on Level 7 and a roof deck on Level 15. Noise levels associated with the outdoor spaces would be created by people talking. A reference noise level of 65 dBA for a male and 62 dBA for a female speaking in a raised voice were used for analyzing potential noise impacts from the outdoor spaces.[157] In order to analyze a typical noise scenario, it was assumed that up to 50 percent of the people (half of which would be male and the other half female) would be talking at the same time. In addition, the hours of operation for use of the outdoor areas were assumed to be from 8:00 A.M. to 12:00 A.M. An additional potential noise source associated with outdoor spaces would be the use of an outdoor sound system (e.g., music or other sounds broadcast through an outdoor mounted speaker system) at the outdoor spaces. The amplified sound system for use in outdoor areas would be designed so as not to exceed the maximum noise level of 75 dBA L_{eq} at the upper levels exterior office spaces and balconies, 80 dBA L_{eq} at the Level 1 outdoor dining and open-air lobby, and 85 dBA L_{eq} at the Level 7 amenity deck and Level 15 roof deck, thereby ensuring that the amplified sound system would not exceed the significance criteria (i.e., an increase of 5 dBA L_{eq}) at any off site noise- sensitive-receptor location. Table 18 on page 130 presents the anticipated number of people at each of the outdoor spaces and the amplified sound system maximum noise levels.

[157] Cyril M. Harris, *Handbook of Acoustical Measurements and Noise Control, Third Edition*, 1991, Table 16.1

Table 18
Outdoor Spaces Analysis Assumptions

Outdoor Space	Approximate Area, (sf)	Estimated Total Number of People[a]	Amplified Sound System Levels, (dBA (L_{eq})
Level 1—Outdoor Dining Areas and Open-Air Lobby	13,356	890	80 dBA at 15 feet
Level 3—Exterior Offices	1,026	68	75 dBA at 15 feet
Level 4—Balcony	1,178	79	75 dBA at 15 feet
Level 5—Balcony	1,178	79	75 dBA at 15 feet
Level 6—Exterior Offices and Balcony	3,467	231	75 dBA at 15 feet
Level 7—Amenity Deck	13,032	869	85 dBA at 25 feet
Level 7—Exterior Offices/Lobbies	4,544	303	75 dBA at 15 feet
Level 8—Exterior Offices and Balcony	6,216	414	75 dBA at 15 feet
Level 9—Exterior Offices and Balcony	4,081	271	75 dBA at 15 feet
Level 10—Exterior Offices and Balcony	9,083	605	75 dBA at 15 feet
Level 11—Exterior Offices and Balcony	5,106	341	75 dBA at 15 feet
Level 12—Exterior Offices and Balcony	6,200	414	75 dBA at 15 feet
Level 13—Exterior Offices and Balcony	6,644	443	75 dBA at 15 feet
Level 14—Exterior Offices and Balcony	5,100	339	75 dBA at 15 feet
Level 15—Roof Deck and Balcony	3,770	251	85 dBA at 25 feet

[a] *Based on maximum 15 square feet per person, per the Building Code.*

Source: Perkins & Will, July 2022; AES, September 2022.

Table 19 on page 131 presents the estimated noise levels from the Project's outdoor areas at the off-site sensitive receptors, resulting from the use of outdoor areas. As presented in Table 19, the estimated noise levels from the outdoor spaces would range from 55.1 dBA (L_{eq}) at off-site receptor location R3 to 57.2 dBA (L_{eq}) at receptor location R1, which would not result in an exceedance of the significance threshold of 5 dBA over the ambient noise levels. Therefore, the Project's potential noise impacts from the outdoor uses would be less than significant, and no mitigation is required.

Parking

The Project would provide a total of 582 parking spaces in six above-ground parking levels that would be integrated into a podium and screened from view from public streets. Sources of noise within the parking garage would primarily include vehicular movements and engine noise, doors opening and closing, and intermittent car alarms. As indicated in Table 20 on page 131, the estimated noise from the parking facilities would be well below the existing ambient noise levels. As such, the Project's noise levels due to the parking facilities at the off-site receptor locations would be below the significance threshold of 5 dBA (L_{eq}) above existing ambient noise levels. Therefore, noise impacts from the parking facilities would be less than significant, and no mitigation is required.

Table 19
Estimated Noise Levels from Outdoor Spaces

Receptor Location	Existing Ambient Noise Levels, dBA (L_{eq})	Estimated Noise from Outdoor Spaces, dBA (L_{eq})	Ambient + Project Noise Levels, dBA (L_{eq})	Significance Threshold,[a] dBA (L_{eq})	Exceedance over Significance Criteria	Significant Impact?
R1	63.8	57.2	64.7	68.8	0.0	No
R2	63.4	56.2	64.2	68.4	0.0	No
R3	59.8	55.1	61.1	64.8	0.0	No

[a] *Significance thresholds are equivalent to the measured daytime or nighttime ambient noise levels, whichever is lower plus 5 dBA.*

Detail calculation worksheets are included in Appendix IS-10 of this document.

Source: AES, 2023.

Table 20
Estimated Noise Levels from Parking Facilities

Receptor Location	Existing Ambient Noise Levels, dBA (L_{eq})	Estimated Noise from Parking Facilities, dBA (L_{eq})	Ambient + Project Noise Levels, dBA (L_{eq})	Significance Threshold,[a] dBA (L_{eq})	Exceedance over Significance Criteria	Significant Impact?
R1	63.8	32.1	63.8	68.8	0.0	No
R2	63.4	38.0	63.4	68.4	0.0	No
R3	59.8	34.3	59.8	64.8	0.0	No

[a] *Significance thresholds are equivalent to the measured daytime or nighttime ambient noise levels, whichever is lower plus 5 dBA.*

Detail calculation worksheets are included in Appendix IS-10 of this document.

Source: AES, 2023.

Loading Dock and Trash Compactor

The Project includes a loading and trash collection area located inside the building's Level 1 (within the north side of the building). The loading dock and trash compactor would be shielded from the off-site sensitive receptors from the Project building design layout. Noise sources associated with the new loading area and trash compactor would include delivery trucks and operation of the trash compactor. Based on measured noise levels from typical loading facilities and trash compactors, delivery/trash collection trucks and trash compactors could generate noise levels of approximately 71 dBA (L_{eq}) and 66 dBA (L_{eq}), respectively, at a distance of 50 feet.[158] However, the trash compactors would be located in

[158] RK Engineering Group, Inc., Wal-Mart/Sam's Club Reference Noise Level Study, 2003.

an enclosed room, which would be effectively shielded to the off-site sensitive receptors. Table 21 on page 133 presents the estimated noise levels at the off-site receptor locations from operation of the loading areas and trash compactor. As indicated in Table 21, the estimated noise from the loading dock and trash compactor would be well below the existing ambient noise levels. As such, the Project's noise levels due to the loading dock and trash compactor at the off-site receptor locations would be below the significance threshold of 5 dBA (L_{eq}) above existing ambient noise levels. Therefore, noise impacts from the Project's loading dock and trash compactor operations would be less than significant, and no mitigation is required.

Off-Site Operational (Traffic) Noise

Off-site roadway noise was analyzed using the FHWA TNM model and traffic data from the Project's Transportation Assessment, which is included as Appendix IS-12 of this document. The project-generated traffic noise impacts were evaluated by comparing the increase in noise levels from the "future without project" condition to the "future with project" condition against the Project's significance threshold for off-site traffic noise impacts. Cumulative noise impacts due to off-site traffic were analyzed by comparing the projected increase in traffic noise levels from "existing" conditions to "future with project" conditions to the Project's significance criteria. Traffic noise levels at the off-site noise sensitive receptors were calculated using FHWA's Traffic Noise Model and the Project's traffic volume data.[159,160] The traffic noise impact analysis is based on the 24-hour CNEL noise descriptor.

Table 22 on page 134 provides the results of the off-site traffic noise analysis. As shown in Table 22, Project-generated traffic would result in a maximum noise increase of 0.7 dBA CNEL along 8th Street (east of Alameda Street). The estimated noise levels along other analyzed roadway segments would be maximum 0.3 dBA CNEL. In addition, the cumulative traffic volumes would result in a maximum increase of 2.3 dBA CNEL along Mateo Street (between 7th Street and 8th Street). The estimated noise increase along Alameda Street (between 6th Street and Olympic Boulevard), 8th Street (between Central Avenue and Lemon Street) would be well below the 5-dBA significance threshold (applicable to noise levels less than 67.5 CNEL (dBA) "normally acceptable" and between 67.5 to 77.5 CNEL (dBA) "conditionally acceptable" land use category for commercial uses). The estimated noise increases along Mateo Street (between 6th Street and 8th Street) would be below the 5-dBA significance threshold (applicable to noise levels between 60 to 70 CNEL (dBA) "conditionally acceptable" land use category for residential use). The estimated noise increases along 7th Street (between Central Street and Santa Fe Avenue) would be below the 3-dBA significance threshold under both Project and Cumulative level (applicable to noise levels within the 70 to 75 CNEL (dBA) "normally unacceptable" land use category for residential and school uses). Therefore, off-site traffic noise impacts associated with the Project would be less than significant, and no mitigation is required.

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159 Federal Highway Administration, Traffic Noise Model (TNM) Version 2.5,

160 Gibson Transportation Consulting, Inc., 1811 Sacramento Project Traffic Analysis, May 2023.

Table 21
Estimated Noise Levels from Loading Dock and Trash Compactor

Receptor Location	Existing Ambient Noise Levels, dBA (L_{eq})	Estimated Noise from Loading Dock and Trash Compactor, dBA (L_{eq})	Ambient + Project Noise Levels, dBA (L_{eq})	Significance Threshold,[a] dBA (L_{eq})	Exceedance over Significance Criteria	Significant Impact?
R1	63.8	57.2	64.7	68.8	0.0	No
R2	63.4	56.2	64.2	68.4	0.0	No
R3	59.8	55.1	61.1	64.8	0.0	No

[a] *Significance thresholds are equivalent to the measured daytime or nighttime ambient noise levels, whichever is lower plus 5 dBA.*

Detail calculation worksheets are included in Appendix IS-10 of this document.

Source: AES, 2023.

Table 22
Off-Site Roadway Traffic Noise Impacts

Roadway Segment	Adjacent Land Use	Calculated Traffic Noise Levels,[a] CNEL (dBA)			Increase in Noise Levels due to Project, dBA (CNEL)		Significant Impact?	
		Existing Conditions (A)	Future Without Project (B)	Future With Project (C)	Project Level (C-B)	Cumulative (C-A)	Project Level	Cumulative
Alameda Street								
– Between 6th St. and 7th St.	Commercial (Future Residential)	69.7	71.2	71.4	0.2	1.7	No	No
– Between 7th St. and Bay St.	Commercial	69.7	70.9	71.1	0.2	1.4	No	No
– Between Bay St. and 8th St.	Commercial	69.7	70.9	70.9	0.0	1.2	No	No
– Between 8th St. and Olympic Blvd.	Commercial	69.3	70.3	70.5	0.2	1.2	No	No
Mateo Street								
– Between 6th St. and 7th St.	Residential	65.0	66.0	66.1	0.1	1.1	No	No
– Between 7th St. and 8th St.	Commercial (Future Mixed-Use)	66.0	68.0	68.3	0.3	2.3	No	No
7th Street								
– Between Central Ave. and Alameda St.	Residential	70.3	70.6	70.6	0.0	0.3	No	No
– Between Alameda St. and Mateo St.	School	69.9	71.5	71.5	0.0	1.6	No	No
– Between Mateo St. and Santa Fe Ave.	Residential	69.2	70.7	70.8	0.1	1.6	No	No
8th Street								
– Between Central Ave. and Alameda St.	Commercial	63.4	64.9	64.9	0.0	1.5	No	No
– Between Alameda St. and Lemon St.	Commercial	61.3	62.2	62.9	0.7	1.6	No	No

[a] *Noise levels are calculated at 10 feet from the edge of roadway. Detail calculation worksheets are included in Appendix IS-10 of this document.*

Source: AES, 2023.

Composite Noise Levels

An evaluation of the Project's composite noise levels, including all Project-related noise sources plus the existing ambient level, was conducted to identify the potential maximum Project-related noise level increase that may occur at the potential future noise-sensitive receptor locations. The overall sound environment of the areas surrounding the Project Site would include contributions from each on-site and off-site noise source associated with the operation of the Project. On-site noise sources associated with the Project would include the use of mechanical equipment, loading dock and trash compactor operations, outdoor uses, and parking operations. Table 23 on page 136 presents the estimated composite noise from Project-related noise sources in terms of CNEL at the potential future noise sensitive receptors. As reported in Table 23, the Project would result in a maximum increase of 0.8 dBA CNEL at potential future receptor R2 and receptor R3 to 0.9 dBA CNEL at potential future receptor R1. The increases in noise levels due to the Project at the off-site receptor R1 would be well below the 3 dBA CNEL significance threshold (applicable to noise level of 70 dBA CNEL or greater at residential uses) and the 5 dBA CNEL significance threshold at receptors R2 and R3 (applicable to noise level less than 70 dBA CNEL at residential and school uses). Therefore, the composite noise level impacts due to Project operation would be less than significant, and no mitigation is required.

Conclusion

Based on the above, potential noise impacts associated with the Project construction and operation would be less than significant, and no mitigation measures are required.

Table 23
Composite Noise Levels

Receptor Location	Existing Ambient Noise Levels (CNEL (dBA))	Calculated Project-Related Noise Levels,[a] CNEL (dBA)					Project Composite Noise Levels (CNEL (dBA))	Ambient Plus Project Composite Noise Levels (CNEL (dBA))	Increase in Noise Levels due to Project (CNEL (dBA))	Significance Criteria[b] (CNEL (dBA))	Significant Impact?
		Traffic	Mechanical	Outdoor Spaces	Parking	Loading					
R1	69.3	56.9	48.4	61.3	38.8	26.8	62.8	70.2	0.9	72.3	No
R2	68.6	54.4	49.9	60.3	44.7	23.2	61.7	69.4	0.8	73.6	No
R3	66.7	45.3	50.0	59.2	41.0	25.6	59.9	67.5	0.8	71.7	No

[a] *Detail calculation worksheets are included in Appendix IS-10 of this document.*

[b] *Significance criteria are equivalent to the existing ambient plus 3 dBA if the estimated noise levels (ambient plus Project) fall within the "normally unacceptable" or "clearly unacceptable" land use categories or ambient plus 5 dBA if the estimated noise levels fall within the "normally acceptable" or "conditionally acceptable" land use categories, per the City of Los Angeles Noise Element. If the estimated noise levels exceed those significance criteria, a noise impact is identified.*

Source: AES, 2023.

b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact.

On-Site Construction Vibration Impacts

Heavy construction equipment (e.g., a bulldozer and excavator) would generate a limited amount of ground-borne vibration at short distances away from the source. Potential vibration impacts due to construction activities are generally limited to buildings/structures that are located in close proximity to the construction site (i.e., within 20 feet related to building damage; 80 feet related to human annoyance at residential uses).[161]

Heavy construction equipment (e.g., a large bulldozer) would generate a vibration level of up to 0.089 inch/second Peak Particle Velocity (PPV) at a distance of 50 feet from the equipment.[162] With respect to potential building damage, FTA provides potential building damage criteria varies from 0.12 PPV (inch/second) for buildings that are extremely susceptible to vibration to 0.3 PPV (inch/second) for engineered concrete and masonry buildings.[163] As discussed in the Project's Historic Report included as Appendix IS-3 of this IS/MND, the nearest historic resource to the Project Site is the Pioneer Truck & Transfer Building located at 1090 Bay Street, approximately 140 feet northeast of the Project Site.[164] Table 24 on page 138 provides the estimated vibration levels at the nearest off-site buildings. As indicated in Table 24, the estimated vibration velocity levels from construction equipment would be below the significance criteria of 0.12 PPV (inch/second), applicable to the nearest off-site historic building and below the 0.3 PPV (inch/second), applicable to the existing industrial buildings surrounding the Project Site.

With respect to potential vibration-related human annoyance associated with on-site construction activities, FTA provides ground-borne vibration impact criteria of 72 VdB for residential uses and 75 VdB for institutional uses (including school).[165] Vibration impacts associated with potential human annoyance were analyzed at three off-site sensitive receptor locations. Table 25 on page 139 provides the estimated vibration levels at the three nearest off-site sensitive receptor locations. As indicated in Table 25, the estimated vibration levels from all construction equipment would be below the significance criteria at all off-site sensitive receptors. As such, the Project's potential vibration impacts with respect to human annoyance associated with on-site construction activities would be less than significant, and no mitigation is required.

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161 Distances calculated based on estimated vibration levels for typical construction equipment at a distance which would be below the 72 VdB significance threshold with respect to human annoyance and 0.12 PPV significance threshold applicable to buildings extremely susceptible to vibration damage.

162 Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018, Table 7-4.

163 Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018, Table 7-5.

164 Stantec, Historical Resources Technical Report for 1811-1825 Sacramento Street Project, Los Angeles, April 2023.

165 Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018, Table 6-3.

Table 24
Construction Vibration Impacts—Building Damage

Receptor Location	Estimated Vibration Velocity Levels at the Off-Site Buildings, PPV,[a]					Significance Threshold, PPV	Significant Impacts?
	Large Bulldozer	Caisson Drilling	Loaded Trucks	Jack-hammer	Small Bulldozer		
FTA Reference Vibration Levels at 25 feet	0.089	0.089	0.076	0.035	0.003	—	—
Industrial buildings to the north	0.156	0.156	0.133	0.061	0.005	0.3[b]	No
Industrial buildings to the south	0.156	0.156	0.133	0.061	0.005	0.3[b]	No
Industrial buildings to the east	0.021	0.021	0.018	0.008	0.001	0.3[b]	No
Industrial buildings to the west	0.013	0.013	0.011	0.005	0.001	0.3[b]	No
Historic structure at 1910 Bay Street, northeast of the Project Site	0.007	0.007	0.006	0.003	0.001	0.12[c]	No

[a] *Vibration level calculated based on FTA reference vibration level at 25 foot distance.*

[b] *FTA criteria for engineered concrete and masonry buildings.*

[c] *FTA criteria for buildings extremely susceptible to vibration damage.*

Source: FTA, 2018; AES, 2023

Off-Site Construction Vibration Impacts

Heavy-duty construction trucks would generate ground-borne vibration as they travel along the Project's anticipated haul route. Based on FTA data, the vibration generated by a typical heavy-duty truck would be approximately 63 VdB (0.00566 PPV) at a distance of 50 feet from the truck. There are existing buildings along the Project's anticipated haul route, including Sacramento Street, Mateo Street, 8th Street, and Porter Street, that are situated approximately 20 feet from the truck travel lane and would be exposed to ground-borne vibration levels of approximately 0.022 PPV. This estimated vibration generated by construction trucks traveling along the anticipated haul route(s) would be well below the most stringent building damage criteria of 0.12 PPV for buildings extremely susceptible to vibration. Therefore, vibration impacts (pursuant to the thresholds of significance for building damage) from off-site construction activities (i.e., construction trucks traveling on public roadways) would be less than significant, and no mitigation is required.

Per FTA guidance, the thresholds of significance for human annoyance is 72 VdB for residential uses. It should be noted that buses and trucks rarely create vibration that exceeds 70 VdB at 50 feet from the receptor unless there are bumps in the road. There are no vibration sensitive uses along anticipated haul routes. However, the potential future mixed-use at receptor location R1 would be approximately 40 feet from the construction trucks at the intersection of Sacramento Street and Mateo Street. The estimated vibration levels generated by construction trucks at 40 feet would be approximately 66 VdB, which would be below the 72-VdB (for residential use) threshold of significance. As such, potential vibration impacts with respect to human annoyance that would result from temporary and intermittent off-site vibration from

Table 25
Construction Vibration Impacts—Human Annoyance

Receptor Location	Estimated Vibration Velocity Levels at the Off-Site Sensitive Receptors, VdB,[a]					Significance Threshold, PPV	Significant Impacts?
	Large Bulldozer	Caisson Drilling	Loaded Trucks	Jack-hammer	Small Bulldozer		
FTA Reference Vibration Levels at 25 feet	87	87	86	79	58	—	—
R1	45	45	44	37	16	72	No
R2	47	47	46	39	18	72	No
R3	39	39	38	31	10	75	No

[a] *Vibration level calculated based on FTA reference vibration level at 25 foot distance.*

Source: FTA, 2018; AES, 2023

construction trucks traveling along the anticipated haul route would be less than significant, and no mitigation is required.

Operational Groundborne Vibration

The Project's day-to-day operations would include typical commercial-grade stationary mechanical and electrical equipment, such as air handling units, condenser units, and exhaust fans, which would produce groundborne vibration and noise. Building mechanical equipment installed as part of the Project would typically include vibration-attenuation mounts to reduce vibration transmission to the building. In addition, the primary sources of transient vibration would include passenger vehicle circulation within the proposed parking area. Groundborne vibration from passenger vehicles would be similar to the existing surface parking lots. Furthermore, the potential future noise sensitive uses are located a minimum of 545 feet from the Project Site. Due to the rapid attenuation characteristics of groundborne vibration, vibration due to Project operation at the potential future sensitive receptors would be well below the perceptible level. Therefore, the Project would not result in the generation of excessive groundborne vibration levels at sensitive receptors in the vicinity of the Project Site. As such, vibration impacts associated with operation of the Project would be below the significance threshold and impacts would be less than significant, no mitigation measures would be required.

Conclusion

Based on the above, groundborne vibration impacts associated with the Project would be less than significant, and no mitigation measures are required.

c. For a project located within the vicinity of a private airstrip or 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 the vicinity of a private airstrip or an airport land use plan or within 2 miles of an airport. Thus, the Project would not expose people residing or working in the project area to excessive airport-related noise levels. The nearest airport is the Los Angeles International

Airport located approximately 11 miles southwest of the Project Site. Since the Project is not located within an airport land use plan, within 2 miles of a public airport or public use airport, or within the vicinity of a private airstrip, impacts with regard to airport-related noise would not occur. Therefore, no impacts with respect to Threshold (c) would occur, and no mitigation is required.

XIV. POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

a. Would the project induce substantial unplanned 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)?

Less Than Significant Impact. A significant impact may occur if a project induces a substantial unplanned population growth in an area, either directly or indirectly. As discussed in Section 2, Project Description, of this IS/MND, the Project does not include a housing component and thus would not directly introduce a new residential population that contributes to population growth in the vicinity of the Project Site or the Central City North Community Plan area.

While construction of the Project would create temporary construction-related jobs, the work requirements of most construction projects are highly specialized such that construction workers remain at a job site only for the time during which their specific skills are needed to complete a particular phase of the construction process. The Project would draw from the existing regional pool of construction workers who typically move from project to project as work is available. Project-related construction workers would not be anticipated to relocate their household's permanent place of residence as a consequence of working on the Project and, therefore, no new permanent residents are expected to be generated during construction of the Project. Accordingly, Project construction would not induce substantial population growth.

Based on employee generation factors from the City of Los Angeles Department of Transportation (LADOT)'s Vehicle Miles Traveled Calculator, the Project is estimated to generate 1,140 net new

employees to the Project Site.[166] According to SCAG's 2020-2045 RTP/SCS, the employment forecast for the City of Los Angeles Subregion in 2023 is approximately 1,917,721 employees.[167] In 2026, the projected buildout year of the Project, the City of Los Angeles Subregion is anticipated to have approximately 1,947,472 employees. [168] Therefore, the projected employment growth in the City between 2023 and 2026 based on SCAG's 2020–2045 RTP/SCS is approximately 29,752 employees. Thus, the Project's estimated 1,140 net new employees would constitute 3.83 percent of the employment growth forecasted between 2023 and 2026.

While some new Project employees may be anticipated to relocate to the Project vicinity, many would not, nor would existing employees be expected to move as a result of redevelopment of the Project Site. Accordingly, the potential indirect increase in population would not be substantial. Specifically, some employment opportunities may be filled by people already residing in the vicinity of the Project Site, and other employees would be expected to commute to the Project Site from other communities both in and outside of the City, as occurs under existing conditions. Therefore, given that the Project would not directly contribute to substantial population growth in the Project area through the development of residential uses and since some of the employment opportunities generated by the Project could be filled by people already residing in the vicinity of the Project Site or others who would commute to the Project Site, the potential growth associated with Project employees who may relocate their place of residence would not be substantial. Further, as the Project would be located in an urbanized area with an established network of roads and other urban infrastructure, the Project would not require the extension of such infrastructure in a manner that would indirectly induce substantial population growth. Based on the above, the Project would not induce substantial population growth either directly or indirectly. Impacts would be less than significant, and no mitigation measures are required.

b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The Project Site is currently developed with three warehouse structures and associated surface parking. As no housing currently exists on the Project Site, the Project would not displace any existing persons or housing or require the construction or replacement housing elsewhere. Therefore, the Project would not create any impacts related to displacement of people or housing. No impacts would occur, and no mitigation measures are required.

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166 LADOT and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020. The existing warehouse structures to be removed produce approximately 13 employees (Warehouse 40,479 square feet * 0.00033 = 13). The Project would produce an estimated 1,153 employees (office 277,700 square feet * 0.004 = 1,111) + (retail 5,200 square feet * 0.002 = 10) + (restaurant/café 8,000 square feet * 0.004 = 32). Accounting for the existing uses to be removed, the Project would produce an estimated 1,140 net new employees.

167 SCAG. 2020-045 RTP/SCS, Demographics and Growth Forecast Appendix, Table 14, p. 35. Based on a linear interpolation of SCAG's employment data for 2016 (1,848,300) and 2045 (2,135,900). The 2023 value is extrapolated from 2016 and 2045 values: [(2,135,900 – 1,848,300) ÷ 29) * 7] + 1,848,300 = ~ 1,917,721.

168 SCAG. 2020-045 RTP/SCS, Demographics and Growth Forecast Appendix, Table 14, p. 35. Based on a linear interpolation of SCAG's employment data for 2016 (1,848,300) and 2045 (2,135,900). The 2026 value is extrapolated from 2016 and 2045 values: [(2,135,900 – 1,848,300) ÷ 29) * 10] + 1,848,300 = ~ 1,947,472.

XV. 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:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire protection?	☐	☐	☒	☐
b. Police protection?	☐	☐	☒	☐
c. Schools?	☐	☐	☒	☐
d. Parks?	☐	☐	☒	☐
e. Other public facilities?	☐	☐	☒	☐

a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services?

Less Than Significant Impact. Fire protection for the Project Site is provided by the LAFD. Specifically, the Project Site is located within the service area of Fire Station No. 17 within Battalion 1 of the Central Bureau.

Construction

Construction activities have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings and coatings) to fire risks from machinery and equipment sparks, and from exposed electrical lines, chemical reactions in combustible materials and coatings, and lighted cigarettes. Given the nature of construction activities and the work requirements of construction personnel, the Occupational Safety and Health Administration has developed safety and health provisions for implementation during construction, which are set forth in 29 Code of Federal Regulations (CFR), Part No. 1926. In accordance with these regulations, construction managers and personnel would be trained in emergency response and fire safety operations, which include the monitoring and management of life safety systems and facilities, such as those set forth in the Safety and Health Regulations for Construction established by the Occupational Safety and Health Administration.[169] Additionally, in accordance with the provisions of the Occupational Safety and Health Administration, fire

[169] United States Department of Labor. Occupational Safety & Health Administration. Title 29 Code of Federal Regulations, Part No. 1926, Part Title: Safety and Health Regulations for Construction, Subpart F, Subpart Title: Fire Protection and Prevention, www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=10671, accessed February 7, 2023.

suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on-site.[170] Construction of the Project would also occur in compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. Thus, compliance with regulatory requirements would effectively reduce the potential for construction activities associated with the Project to expose people to the risk of fire or explosion related to hazardous materials and non-hazardous combustible materials.

According to the Safety Element of the City of Los Angeles General Plan, the nearest disaster routes to the Project Site include Alameda Street, which is located west of the Project Site, and the I-10, which is located 0.2 mile south of the Project Site.[171,172] Response times could temporarily increase for emergency vehicles traveling along streets adjacent to the Project Site and main connectors due to travel time delays caused by traffic during the Project's construction phase. However, with implementation of the Construction Management Plan in accordance with Project Design Feature TR-PDF-1 below, which is incorporated into the Project, emergency access would not be impeded. Furthermore, construction activities are expected to be primarily contained within the Project Site boundary or in the parking lane along the Project frontage on Sacramento Street. Therefore, with implementation of the Project's Construction Management Plan, impacts would be less than significant, and no mitigation measures are required.

Operation

Based on employee generation rates provided by the City of Los Angeles VMT Calculator Documentation, the Project would generate approximately 1,153 employees.[173] Thus, the daytime population within Fire Station No. 17's service area would increase by approximately 1,153 persons, as compared to existing conditions. This daytime population projected to be generated by the Project would increase the demand for LAFD fire protection and emergency medical services. The Project would comply with all applicable provisions set forth in the City Building Code and Fire Code regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc. Compliance with applicable City Building Code and Fire Code requirements would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, prior to the issuance of a building permit. As discussed above, LAMC Chapter V, Article 7, Section 57.512.1 provides that response distances, which are based on land use and fire flow requirements, range from 0.75 mile for an engine company to 2 miles for a truck company. Where a site's response distance is greater than permitted, all structures must have automatic fire sprinkler systems. As set forth by the LAFD, based on LAMC criteria regarding response distance, the first-due Engine Company should be within 0.75 mile, and the first-due Truck Company within 1 mile. Based on the response distances from existing fire stations and the type of equipment available at the fire station nearest the Project Site, LAFD has concluded fire

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170 United States Department of Labor. Occupational Safety & Health Administration. Title 29 Code of Federal Regulations, Part No. 1926, Part Title: Safety and Health Regulations for Construction, Subpart F, Subpart Title: Fire Protection and Prevention, www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=10671, accessed February 7, 2023.

171 Los Angeles General Plan Safety Element, November 1996, Exhibit H, Critical Facilities and Lifeline Systems, p. 61.

172 County of Los Angeles Department of Public Works, Disaster Route Maps, City of Los Angeles Central Area, August 2008.

173 Gibson Transportation Consulting, Inc., Transportation Assessment for the 1811 Sacramento Project, May 2023, Appendix D, VMT Analysis Worksheets. See Appendix IS-12.1 of this IS/MND.

protection would be inadequate.[174] At present, LAFD has no immediate plans to increase staffing or resources in the area. However, the LAFD would be consulted during final building design to ensure adequate compliance with the Building and Fire Codes prior to the issuance of any construction permits. Compliance with applicable regulatory requirements, including LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, would ensure that adequate fire prevention features would be provided that would reduce the demand on LAFD facilities and equipment. Therefore, the Project would not result in the need for new or physically altered fire facilities.

With regard to emergency vehicle access during operation, as described in Section 2, Project Description, of this IS/MND and above, the Project does not propose the permanent closure of any local public streets and primary access to the Project Site would continue to be provided from the surrounding streets. As discussed in Checklist Question No. XVII, Transportation, below, the Project's driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in Section 57.118 of the LAMC, and which are required prior to the issuance of a building permit. Furthermore, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. As such, emergency access to the Project Site and surrounding area would be maintained during operation of the Project.

As discussed in the Utility Report, included as Appendix IS-14 of this IS/MND, the Information of Fire Flow Availability Report (IFFAR) submitted to LADWP shows there would be insufficient capacity in the existing water infrastructure system under a 12,000 gpm fire flow and system upgrades would be necessary to meet the fire flow demand for the Project. As previously discussed, the Project would incorporate a fire sprinkler suppression system in the proposed building to reduce the public hydrant demands. In addition, as part of the Project, required water service upgrades necessary to achieve the adequate fire flow would be implemented. As specifically set forth in Project Design Feature WAT-PDF-1 included in Section XIX, Utilities and Service Systems—Water Infrastructure, of this IS/MND, such upgrades are anticipated to involve replacing existing water mains in the vicinity under as required by LADWP or pay in-lieu fees to LADWP for the improvements. With the implementation of Project Design Feature WAT-PDF-1, public water infrastructure would provide adequate water pressure to serve the Project site's anticipated fire flow demand. With the proposed fire sprinkler system and implementation of the required improvements, adequate fire flow would be provided to the Project Site to serve the Project, and impacts would be less than significant.

Based on the above, potential impacts to fire protection services would be reduced through compliance with numerous construction and Building Code and Fire Code standards affecting structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, building sprinkler systems, etc. Therefore, the Project would not result in the need for new or physically altered fire facilities, the construction of which could cause significant

[174] Written correspondence from Orin Saunders, Fire Marshall Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department included as Appendix 11.1 of this MND, February 10, 2023.

environmental impacts, in order to maintain acceptable service. Therefore, impacts to fire protection would be less than significant, and no mitigation measures are required.

b. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services?

Less Than Significant Impact. Police protection services are provided to the Project Site and the surrounding area by the Los Angeles Police Department (LAPD). The Project Site is located in Reporting District 1309 within the jurisdiction of the LAPD's Central Bureau, and is served by the Newton Community Police Station located at 3400 S Central Ave, approximately 2.8 miles southwest of the Project Site.[175] This station has a service area encompassing 9 square miles with a population of over 150,000 people.[176]

Since the daytime population generated at the Project Site during construction (i.e., construction workers) would be temporary in nature, construction of the Project would not generate a permanent population on the Project Site that would substantially increase the police service population of the Newton Area. However, construction sites can be sources of nuisances and hazards and invite theft and vandalism. When not properly secured, construction sites can contribute to a temporary increased demand for police protection services. As such, the Project Applicant has incorporated into the Project temporary security measures including security fencing, lighting, and locked entry, which features would reduce the potential demand on police protection services at the Project Site associated with theft and vandalism during construction.

Project construction would be short-term. Construction activities are expected to be primarily contained within the Project Site boundary or in the parking lane along the Project frontage on Sacramento Street. In accordance with Project Design Feature TR-PDF-1, the Project would submit for approval and then implement a Construction Management Plan that would include specific measures to be implemented by the contractor to ensure safe and adequate access to the Project Site such that construction activities would not interfere with emergency access or response times.

Regarding Project operations, LAPD evaluates service capacity based on the residential population within the particular service area. As previously stated, the Project would not generate a residential population but would result in a daytime population of approximately 1,140 net new employees. To ensure security measures throughout the Project Site, the Project would include a closed circuit camera system and keycard or guarded entry. The Project would also design building entrances and exits, open spaces, and pedestrian walkways to be open and in view of surrounding sites, and properly lit. Proper lighting of buildings and walkways would ensure visibility and secure routes between parking areas and points of entry into buildings. In addition, the Project would not impede police access to the Project Site. The

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[175] City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5166-030-008; -009, http://zimas.lacity.org/, accessed November 16, 2023.

[176] Los Angeles Police Department, About Newton www.lapdonline.org/newton_community_police_station/content_basic_view/1779, accessed November 16, 2023.

Project would not result in the permanent closure of any local public streets, and access to the Project Site would continue to be provided from adjacent streets. Furthermore, in accordance with California Vehicle Code (CVC) Section 21806, drivers of police vehicles have the ability to avoid traffic by using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic. Accordingly, Project operation would not cause a substantial increase in emergency response times due to traffic congestion. In addition, as set forth in the response letter provided by LAPD, included in Appendix IS-11.2 of this IS/MD, the Project would not result in the need for new or altered police facilities. Therefore, Project operation would not substantially increase the service population of the Newton Community Police Station and associated calls for LAPD services.

Notwithstanding, consistent with the decision in *City of Hayward v. Board of Trustees of California State University* and the requirements of California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate police services is the responsibility of the City. LAPD will continue to monitor population growth and land development in the City and identify additional resource needs, including staffing, equipment, basic cars, other special apparatuses, and possibly station expansions or new station construction needs, that may become necessary to achieve the required level of service. Through the City's regular budgeting efforts, LAPD's resource needs will be identified and allocated according to the priorities at the time. At this time, LAPD has not identified the need for any new station construction in the area either because of this Project or other projects in the service area. If LAPD determines that new facilities are necessary at some point in the future, such facilities: (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size; and (3) could qualify for a categorical exemption or Mitigated Negative Declaration under CEQA Guidelines Section 15301 or 15332 and would not be expected to result in significant impacts, and projects involving the construction or expansion of a police station would be addressed independently of the Project pursuant to CEQA. Further analysis, including a specific location for a future police station, would be speculative and beyond the scope of this document.

Therefore, based on the above, the Project would not result in the need for new or altered police facilities, or substantially increase the demand for police facilities. Impacts would be less than significant, and no mitigation measures are required.

c. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools?

Less Than Significant Impact. The Project Site is located within the boundaries of the Los Angeles Unified School District (LAUSD). LAUSD is divided into six local districts. The Project Site is located in Local District-East and is served by Hollenbeck Middle School, 9th Street Elementary, Theodore Roosevelt Senior High School, and Felicitas and Gonzalo Mendez Senior High School.[177] As previously discussed, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in a direct increase in the number of students within the service area of LAUSD. In addition, the number of students may be indirectly generated by the Project that could attend

[177] Los Angeles Unified School District, Resident School Identifier, https://rsi.lausd.net/ResidentSchoolIdentifier/, accessed November 16, 2023.

LAUSD schools serving the Project Site would not be substantial because not all employees of the Project are likely to reside in the vicinity of the Project Site. Further, pursuant to Senate Bill 50, the Project Applicant would be required to pay development fees for schools to LAUSD prior to the issuance of building permits. Pursuant to Government Code Section 65995, the payment of these fees is considered as full legal mitigation of Project-related school impacts. Thus, the Project would not result in the need for new or altered school facilities. Therefore, the Project's impacts would be less than significant, and no mitigation measures would be required.

d. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for park services?

Less Than Significant Impact. Parks and recreational facilities in the vicinity of the Project Site are primarily operated and maintained by the Los Angeles Department of Recreation and Parks (RAP). Nearby parks and recreational facilities within an approximate 2-mile radius of the Project Site include: Arts District Park (0.73 mile); Gladys Park (0.75 mile); Central Park Recreation Center (1.12 miles); Boyle Heights Sports Center (1.24 miles); Hollenbeck Park and Recreation Center (1.34 miles); Pecan Recreation Center (1.35 miles); Spring Street Park (1.41 miles); City Hall Center Park (1.60 miles); Pershing Square Park (1.60 miles); Lou Costello Jr. Recreation Center (1.61 miles); Trinity Recreation Center (1.61 miles); Ross Snyder Recreation Center (1.63 miles); Valencia Community Park (1.63 miles); Ramon Garcia Recreation Center (1.67 miles); Los Angeles Plaza Park (1.79 miles); Evergreen Recreation Center (1.87 miles); and Prospect Park (1.89 miles).[178]

Construction

Given the temporary nature of construction activities, construction of a project would not introduce a permanent population to an area which could result in an increase in the use of existing parks and recreational facilities that would result in the need for new parks and recreational facilities or the expansion of existing facilities. Additionally, the use of public parks and recreational facilities by construction workers would be expected to be limited, as construction workers are highly transient in their work locations and are more likely to utilize parks and recreational facilities near their places of residence. Additionally, due to the employment patterns of construction workers in Southern California and the operation of the market for construction labor, which require construction workers to commute to job sites that change many times in the course of a year, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by the Project. Thus, construction of the Project would not generate a demand for park facilities that cannot be adequately accommodated by existing or planned facilities and services. Therefore, the construction workers associated with the Project would not result in a notable increase in the residential population within the vicinity of the Project Site, which would result in a corresponding permanent demand for parks in the vicinity of the Project Site. Impacts would be less than significant, and no mitigation measures are required.

[178] City of Los Angeles Department of Recreation and Parks, Facility Map Locator, https://www.laparks.org/maplocator, accessed November 16, 2023.

Operation

As previously discussed, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in on-site residents who would utilize nearby parks and/or recreational facilities. Additionally, the new employment opportunities that would be generated by the Project may be filled, in part, by employees already residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities. Therefore, only a fraction of the new employees generated by the Project could create an additional demand for parks. While it is possible that some of these employees may utilize local parks and recreational facilities, such use would be anticipated to be limited due to work obligations and the amount of time it would take for employees to access off-site local parks. In addition, Project employees would be more likely to use parks near their homes during non-work hours.

As discussed in Section 2, Project Description, of this IS/MND, the Project would include approximately 41,500 square feet of outdoor areas throughout the Project Site. Specifically, the Project would include 25,500 square feet of exterior (uncovered) office space, 2,100 square feet of outdoor dining, 10,900 square feet of outdoor amenity deck (Level 7), and 3,000 square feet of rooftop deck (Level 15). Landscaping elements and outdoor areas would be provided on the ground floor of the proposed office building and would include outdoor dining areas and an open-air lobby. The Project would implement a detailed materials palette outdoors, that would feature heavy timber and wooden benches, concrete pavers, wood decks, and different planters and trees. As such, the Project's on-site open space would help to offset the demand for off-site parks and recreational facilities that could occur from the Project's net new employees. Thus, the Project would not result in the need for new or altered park facilities, or substantially increase the demand for parks. Impacts would be less than significant, and no mitigation measures are required.

e. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities?

Less Than Significant Impact. Other public facilities provided to the Project Site include library services. The Los Angeles Public Library (LAPL) provides library services to the City though its Central Library, 72 branch libraries, as well as through Web-based resources.[179] The Project Site area is served by existing LAPL facilities within the Central City North Community Plan Area, including the Robert Louis Stevenson Branch Library (2.9 miles east); Little Tokyo Branch Library (1.8 miles north); Benjamin Franklin Branch Library (2.2 miles northeast); Central Library (2.3 miles northwest); and Chinatown Branch Library (2.5 miles north).[180]

[179] Los Angeles Public Library Strategic Plan, 2015–2020.

[180] Los Angeles Public Library, Branch Map, https://lapl.org/branches?distance%5Bpostal_code%5D=90021&distance%5Bsearch_distance%5D=3&distance%5Bsearch_units%5D=mile, accessed November 16, 2023.

Construction

As previously discussed, construction of the Project would result in a temporary increase of construction workers on the Project Site. However, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of Project construction. In addition, construction workers would be more likely to use libraries near their places of residence during non-work hours. Therefore, Project-related construction workers would not result in a notable increase in the resident population within the service area of either library serving the Project Site or an overall corresponding demand for library services in the vicinity of the Project Site. As such, construction of the Project would not exceed the capacity of local libraries to adequately serve the existing residential population based on target service populations or as defined by the LAPL. Project construction would not substantially increase the demand for library services for which current demand exceeds the ability of the facility to adequately serve the population. Impacts would be less than significant, and no mitigation measures are required.

Operation

As previously discussed, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in a direct increase in the number of residents within the service population of the local LAPL facilities. In addition, Project employees would have internet access to LAPL and other web-based resources, decreasing the demand on library facilities. Furthermore, as Project employees would be more likely to use library facilities near their homes during non-work hours and given that some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site, Project employees and the potential indirect population generation that could be attributable to those employees would generate minimal demand for library services. Impacts would be less than significant, and no mitigation measures are required.

XVI. RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

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?

Less Than Significant Impact. As discussed above in Response to Checklist Question XV.d., the Project would not generate a new residential population that would regularly utilize nearby parks and recreational facilities, and any use of local parks and recreational facilities is anticipated to be limited. The new employment opportunities generated by the Project may be filled, at least in part, by employees presently residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities. Therefore, only a fraction of new Project employees would be expected to create new demand for local parks and recreational facilities, and such use is anticipated to be limited due to work obligations and the travel time necessary to access off-site parks and recreational facilities. In addition, Project employees are often more likely to use parks and facilities near their homes during non-work hours. Furthermore, the Project proposes on-site open space areas in the form of outdoor dining space, exterior office space, and garden and rooftop gathering spaces thus reducing the likelihood that employees would use local parks and recreational facilities. Impacts would be less than significant, and no mitigation measures are required.

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?

No Impact. As discussed in Section 2, Project Description, of this IS/MND, the Project would include approximately 41,500 square feet of outdoor areas throughout the Project Site. Specifically, the Project would include 25,500 square feet of exterior (uncovered) office space, 2,100 square feet of outdoor dining, 10,900 square feet of outdoor amenity deck (Level 7), and 3,000 square feet of rooftop deck (Level 15). Landscaping elements and outdoor areas would be provided on the ground floor of the proposed office building and would include outdoor dining areas and an open-air lobby. The impacts of the construction of the indoor and outdoor open space and recreational amenities are analyzed as part of the Project throughout this MND. As also discussed above, the Project does not include any residential uses and therefore would not result in any direct substantial population growth that would increase use of existing recreational facilities. Therefore, the Project would not necessitate construction of new recreational facilities. No Project impacts would occur, and no mitigation measures are required.

XVII. TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	☐	☐	☒	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d. Result in inadequate emergency access?	☐	☐	☒	☐

The following analysis is based, in part, on the *Transportation Assessment for the 1811 Sacramento Project* (Transportation Assessment) prepared by Gibson Transportation Consulting, Inc., dated May 2023 and included as Appendix IS-12.1 of this IS/MND. The Transportation Assessment was prepared in accordance with the assumptions, methodologies, and procedures outlined in the City of Los Angeles Department of Transportation (LADOT) Transportation Assessment Guidelines (TAG) (August 2022, and was approved by LADOT as provided in the Transportation Impact Assessment Approval Letter dated June 27, 2023, included as Appendix IS-12.2 of this IS/MND. The scope of, and analysis included in, the Transportation Assessment was developed in consultation with LADOT as set forth in a Memorandum of Understanding included as Appendix A of the Transportation Assessment.

a. Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Less Than Significant. Table 2.1-1 of the TAG provides a list of City documents that establish the City's transportation regulatory framework and help guide the determination of whether a project conflicts with the City's plans, programs, ordinances, or policies. A project would be considered consistent with, and not to conflict with, a policy if it is generally in conformance with it and does not obstruct the implementation of that policy or preclude future improvements. If a conflict is identified, mitigation measures would focus on improving access, comfort, and safety for all road users, especially pedestrians, bicyclists, and transit riders. Each of the documents listed in Table 2.1-1 of the TAG was reviewed for its applicability to the Project, and the relevant transportation-related policies are summarized below, along with an assessment of the Project's consistency with each.

Mobility Plan 2035

Mobility Plan 2035 combines "complete street" principles with the following goals and objectives that define the City's mobility priorities:[181] The Mobility Plan includes five main goals that define the City's high-level mobility priorities: (1) Safety First; (2) World Class Infrastructure; (3) Access for All Angelenos; (4) Collaboration, Communication, and Informed Choices; and (5) Clean Environments and Healthy Communities. Each of the goals contains policies to support the achievement of those goals. The Project consistency with specific policies of Mobility Plan 2035 is assessed below.

> Policy 1.1 Roadway User Vulnerability—Design, plan, and operate streets to prioritize the safety of the most vulnerable roadway user.

The Project is requesting a Waiver of Dedication and Improvement for both Sacramento Street and Wilson Street to maintain the existing roadway and ROW widths. The Project would improve existing curb cuts along the Project frontages by providing driveways designed and placed in accordance with current City standards for typical two-way operations to reduce interruptions to vehicle, bicycle and pedestrian safety. Furthermore, the Project does not propose modifying, removing, or otherwise affecting existing bicycle infrastructure, and the Project driveways are not proposed along a street with an existing bicycle facility. Therefore, the Project would not conflict with this policy.

[181] Los Angeles Department of City Planning, Mobility Plan 2035: An Element of the General Plan, last adopted by City Council on September 7, 2016.

> Policy 1.6 Multi-Modal Detour Facilities—Design detour facilities to provide safe passage for all modes of travel.

Construction activities would be maintained on-site. Any impediments to the public right-of-way would be addressed with the implementation of a Construction Management Plan. Therefore, the Project would not conflict with this policy.

> Policy 2.2 Complete Streets Design Guide-Establish the Complete Street Design Guide as the City's document to guide the operations and design of streets and other public rights-of-way.

The adjacent streets would be improved with consideration of the safety of all users, including pedestrians, bicyclists, and vehicles. Therefore, the Project would not conflict with this policy.

> Policy 2.3 Pedestrian Infrastructure—Recognize walking as a component of every trip, and ensure high-quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.

As discussed in Section 2, Project Description, of this IS/MND, the Project would enhance pedestrian access within and around the Project Site by providing pedestrian connections and open-air ground-level lobby spaces. To enhance the pedestrian environment, the Project would maintain or improve sidewalks along the Project frontages to meet Mobility Plan standards and remove and improve existing curb cuts to reduce interruptions to pedestrian traffic and safety. Landscaping along the Project frontages would also be provided to further enhance the pedestrian environment. Therefore, the Project would not conflict with this policy.

> Policy 2.4 Neighborhood Enhanced Network—Provide a slow speed network of locally serving streets.

No access to the Project Site is provided along street segments identified in the Neighborhood Enhanced Network, thereby ensuring that minimum Project traffic would interfere with the neighborhood character of the surrounding area. Therefore, the Project would not conflict with this policy.

> Policy 2.5 Transit Network—Improve the performance and reliability of existing and future bus service.

No streets adjacent to the Project Site are identified in the Transit Enhanced Network. Nonetheless, the Project would not interfere with existing service and would not preclude future transit service improvements to the surrounding area. Therefore, the Project would not conflict with this policy.

> Policy 2.6 Bicycle Networks—Provide safe, convenient, and comfortable local and regional bicycling facilities for people of all types and abilities (includes scooters, skateboards, rollerblades, etc.).

No streets adjacent to the Project Site are identified as part of the Bicycle network. The Project would provide infrastructure and services to encourage bicycling for employees and visitors to the Project Site. Specifically, the Project would provide a total of 98 bicycle parking spaces, including 63 long-term spaces

and 35 short-term spaces. The Project would also provide bike storage and locker rooms. Therefore, the Project would not conflict with this policy.

> Policy 2.6 Vehicle Network—Provide vehicular access to the regional freeway system.

As discussed in Section 2, Project Description, of this IS/MND, vehicular access to the Project Site would be provided via Sacramento Street, approximately 0.2 mile north of I-10. Therefore, the Project would not conflict with this policy.

> Policy 2.9 Multiple Networks—Consider the role of each mode enhanced network when designing a street that included multiple modes.

No streets adjacent to the Project Site are part of any networks designated by the Mobility Plan. Nonetheless, the Project would provide and accommodate the various modes of travel on the streets and minimize conflicts to prioritize safety. The Project would not preclude any future improvements to the adjacent roadway network. Therefore, the Project would not conflict with this policy.

> Policy 2.10 Loading Areas—Facilitate the provision of adequate on and off-street loading areas.

The Project would provide passenger and truck-loading zones within the Project Site. Vehicular access to the Project Site would be provided via a primary driveway off of Sacramento Street. Truck loading and delivery areas would be located on the northern perimeter of the Project Site with ingress/egress off of Wilson Street. The loading zones would be managed to facilitate safe loading operations and limit vehicle queue spillovers into the travel lanes. Therefore, the Project would not conflict with this policy.

> Policy 3.1 Access for All—Recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes—including goods movement—as integral components of the City's transportation system.

The Project is committed to encouraging multi-modal transportation alternatives and access for all travel modes to and from the Project Site. The Project would provide loading zones on-site and infrastructure (short- and long-term bicycle parking, easy bicycle access to the Project Site) to encourage walking and bicycling. Additionally, the Project is located within 0.25 mile of Metro Bus Lines 60 and 62 located at 7th Street and Decatur Street, and Metro Bus Line 66 located at Olympic Boulevard and Lawrence Street which provide access for employees and visitors to the Project Site. Therefore, the Project would not conflict with this policy.

> Policy 3.2 People with Disabilities—Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public right-of-way.

The Project's vehicular and pedestrian entrances would be designed in accordance with LADOT standards and would comply with Americans with Disabilities Act (ADA) requirements. The Project design would also be in compliance with all ADA requirements and would provide direct connections to pedestrian amenities at adjacent intersections. Therefore, the Project would not conflict with this policy.

> Policy 3.3 Land Use Access and Mix—Provide equitable land use decisions that result in fewer vehicle trips by providing grater proximity and access to jobs, destinations, and other neighborhood services.

The Project would provide a mix of land uses including office, retail, and restaurant uses, offering users an opportunity to accomplish a number of daily errands in fewer trips. Additionally, the Project Site is located within 0.25 mile of Metro Bus Lines 60 and 62 located at 7th Street and Decatur Street, and Metro Bus Line 66 located at Olympic Boulevard and Lawrence Street. The Project Site is also located approximately 1.2 miles from the Metro A Line Washington Station and 1.5 miles from the Metro L Line Little Tokyo/Arts District Station, both of which provide connections to regional destinations. Therefore, the Project would not conflict with this policy.

> Policy 3.5 Multi-Modal Features—Support "first-mile, last-mile solutions" such as multimodal transportation services, organizations, and activities in the areas around transit stations and major bus stops (transit stops) to maximize multi-modal connectivity and access for transit riders.

The Project would provide TDM measures including a reduced parking supply, parking cash-out, promotions and marketing, bicycle parking facilities, and pedestrian network connections. These features would support multi-modal connectivity and access for transit riders. Therefore, the Project would not conflict with this policy.

> Policy 3.8 Bicycle Parking—Provide bicyclists with convenient, secure, and well-maintained bicycle parking facilities.

The Project would provide a total of 98 bicycle parking spaces, including 63 long-term spaces and 35 short-term spaces throughout the Project Site, satisfying the LAMC requirement. Therefore, the Project would not conflict with this policy.

> Policy 4.5 Improved Communication—Facilitate communications between citizens and the City in reporting on and receiving responses to non-emergency street improvements.

As part of the Project's Construction Management Plan, advance notification to the adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of construction, would be provided. Therefore, the Project would not conflict with this policy.

> Policy 4.8 Transportation Demand Management Strategies—Encourage greater utilization of Transportation Demand Management (TDM) strategies to reduce dependence on single-occupancy vehicles.

The Project would implement TDM strategies to promote and provide employees and patrons with opportunities to utilize alternative transportation modes, including a reduced parking supply, parking cash-out, promotions and marketing, bicycle parking facilities, and pedestrian network connections. Therefore, the Project would not conflict with this policy.

> Policy 4.13 Parking and Land Use Management—Balance on-street and off-street parking supply with other transportation and land use objectives.

The Project would provide sufficient off-street parking to accommodate Project parking demand. As discussed in Section 2, Project Description, of this IS/MND, the Project would provide a total of 582 parking spaces in six above-ground parking levels that would be integrated into a podium and screened from view from public streets. Therefore, the Project would not conflict with this policy.

> Policy 4.14 Wayfinding—Provide widespread, user-friendly information about mobility options and local destinations, delivered through a variety of channels including traditional signage and digital platforms.

The Project would incorporate illumination for parking, signage, and security purposes. Specifically, wayfinding signs would be located at the parking garage entrances and exits, at building lobbies, on the interior-facing faces of stages, and on the ground level throughout the Project Site, and would be integrated into the overall design of the building. In addition, signage would be proposed throughout the Project Site on the exterior of building fronting the public rights-of-way. Therefore, the Project would not conflict with this policy.

> Policy 5.1 Sustainable Transportation—Encourage the development of a sustainable transportation system that promotes environmental and public health.

The Project would provide bicycle and pedestrian facilities and connections throughout the Project Site to promote healthy transportation options. In addition, 30 percent of the Project's parking spaces would be designated as Electric Vehicle (EV) spaces capable of supporting future electric vehicle supply equipment (EVSE) and 20 percent of the spaces would be equipped with EV Charging Stations. Therefore, the Project would not conflict with this policy.

> Policy 5.2 Vehicle Miles Traveled (VMT)—Support ways to reduce vehicle miles traveled (VMT) per capita.

The Project would incorporate TDM measures including reduced parking supply, parking cash-out, promotions and marketing, bicycle parking facilities, and pedestrian network connections to promote and provide employees and patrons the opportunity to utilize alternative transportation modes to reduce VMT by reducing the number of single occupancy vehicle trips to the Project Site. Therefore, the Project would not conflict with this policy.

> Policy 5.4 Clean Fuels and Vehicles—Continue to encourage the adoption of alternative fuels, new mobility technologies, and supporting infrastructure.

The Project would incorporate TDM measures to promote and provide employees and patrons the opportunity to utilize alternative transportation modes to reduce VMT by reducing the number of single occupancy vehicle trips to the Project Site, as well as support electric vehicles by providing charging stations and infrastructure. Specifically, TDM measures would include reduced parking supply, parking cash-out, promotions and marketing, bicycle parking facilities, and pedestrian network connections. In addition, 30 percent of the Project's parking spaces would be designated as EV spaces capable of supporting future EVSE and 20 percent of the spaces will be equipped with EV Charging Stations. Therefore, the Project would not conflict with this policy.

Plan for a Healthy Los Angeles

Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan introduces guidelines for the City to follow to enhance the City's position as a regional leader in health and equity, encourage healthy design and equitable access, and increase awareness of equity and environmental issues.[182]

> Policy 1.5 Plan for Health—Improve Angelenos' health and well-being by incorporating a health perspective into land use, design, policy, and zoning decisions through existing tools, practices, and programs.

The Project would enhance pedestrian access within and around the Project Site by providing improvements to the sidewalks, landscaping, and pedestrian safety measures within the Project and along the Project frontages. Further, the Project would provide infrastructure such as bicycle parking to encourage bicycling for employees and visitors to the Project Site. As such, the Project would encourage the use of active travel modes and thereby promote healthy living. The Project would also replace existing warehouse facilities and as a result, would improve existing curb cuts to meet current City standards for typical two-way operations, which would improve pedestrian facilities along the Project frontages. Therefore, the Project would not conflict with this policy.

> Policy 2.8 Basic Amenities—Promote increased access to basic amenities, which include public restrooms and free drinking water in public spaces, to support active living and access to health-promoting resources.

As discussed in Section 2, Project Description, of this IS/MND, the Project would include approximately 41,500 square feet of outdoor areas throughout the Project Site. Specifically, the Project would include 25,500 square feet of exterior (uncovered) office space, 2,100 square feet of outdoor dining, 10,900 square feet of outdoor amenity deck (Level 7), and 3,000 square feet of rooftop deck (Level 15). Landscaping elements and outdoor areas would be provided on the ground floor of the proposed office building and would include outdoor dining areas and an open-air lobby. Therefore, the Project would not conflict with this policy.

> Policy 5.7 Land Use Planning for Public Health and GHG Emission Reduction—Promote land use policies that reduce per capita greenhouse gas emissions, result in improved air quality and decreased air pollution, especially for children, seniors and others susceptible to respiratory diseases.

The Project is estimated to generate lower VMT per capita for employees than the average for the area, as discussed further below. Additionally, the Project incorporates several design features, which include TDM measures to reduce the number of single occupancy vehicle trips to the Project Site, including implementation of a reduced parking supply, parking cash-out, promotions and marketing, bicycle parking facilities, and pedestrian network connections. VMT directly contributes to GHG emissions, so a reduced VMT per capita also reduces GHG per capita. Therefore, the Project would not conflict with this policy.

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[182] Los Angeles Department of City Planning, Plan for a Health Los Angeles: A Health and Wellness Element of the General Plan, March 2015.

Land Use Element of the General Plan

The City General Plan's Land Use Element contains 35 Community Plans that establish specific goals and strategies for the various neighborhoods across Los Angeles.[183] The Project is located within the Central City North Community Plan area. The City is in the process of updating the Central City and the Central City North Community Plans as part of the DTLA 2040. A detailed analysis of the Project's consistency with the Community Plan is provided in Checklist Question No. XI, Land Use, of this IS/MND. An assessment of the Project's consistency with relevant objectives of the Community Plan and DTLA 2040 related to circulation is provided below.

Central City North Community Plan

Goal 10—Develop a public transit system that improves mobility with convenient alternatives to automobile travel.

Objective 10-1—To encourage local and express bus service through the Central City North community and encourage park-and-ride facilities to interface with freeways, high occupancy vehicle (HOV) facilities and rail facilities.

Policy 10-1.1—Coordinate with the MTA to improve local bus service to and within the Central City North community and on a Bus Restructuring Program for the area.

Policy 10-1.2—Encourage the provision of safe, attractive and clearly identifiable transit stops with user friendly design amenities.

Policy 10-1.3—Encourage the extension, wherever feasible, of programs aimed at enhancing the mobility of senior citizens, disabled persons, and the transit dependent population.

The Project would encourage more transit use by developing a commercial office building with convenient access to bus transit services. Further, the Project would improve the pedestrian environment within and around the Project Site with enhanced landscaping features, new street trees, and an open-air lobby with active street frontages. These open spaces would be open to the Project employees and visitors, as well as the public. Therefore, the Project would not conflict with this goal or objective or these policies.

Goal 11—A well maintained, safe, efficient freeway and street network.

Objective 11-1—That signalized intersections are integrated with the City's ATSAC system by the year 2010.

Policy 11-1.1—Install ATSAC equipment at an accelerated rate with expanded funding.

Policy 11-1.2—Support the existing Department of Transportation program to provide separate right and/or left turn lanes on arterial streets, where feasible.

Policy 11-1.3—Accelerate controller replacement to upgrade and improve signal efficiency.

[183] Los Angeles Department of City Planning, City of Los Angeles General Plan Framework Element, approved July 27, 1995.

The City completed integration of the ATSAC system at signalized intersections in 2013. The Project would not preclude LADOT from making any further changes to traffic signal controllers nor would it preclude the installation of turn lanes on arterial streets. Therefore, the Project would not conflict with this goal or objective or these policies.

Goal 12—Encourage alternative modes of transportation to the use of single occupant vehicles (SOV) in order to reduce vehicular trips.

Objective 12-1—To pursue transportation management strategies that can maximize vehicle occupancy, minimize average trip length, and reduce the number of vehicle trips.

Policy 12-1.1—Encourage non-residential development to provide employee incentives for utilizing alternatives to the automobile (i.e., carpools, vanpools, buses, flex time, bicycles, and walking, etc.)

Policy 12-1.3—Require that proposals for major new non-residential development projects include submission of a TDM Plan to the City.

Policy 12-1.4—TDM measures in Central City North should be consistent with adopted City policy.

As discussed in Section 2, Project Description, of this IS/MND, the Project Site is located in an urban setting that is well served by a variety of public transit options. In particular, the Project Site is located in the vicinity of Metro Bus Lines 60, 62, and 66. The Project Site is also located approximately 1.2 miles from the Metro A Line Washington Station and 1.5 miles from the Metro L Line Little Tokyo/Arts District Station. The Project would provide a total of 98 bicycle parking spaces, including 63 long-term spaces and 35 short-term spaces, as well as bike storage and locker rooms. Additionally, the Project would encourage walking as an alternative mode of transportation by providing 12 new street trees and by providing all new street and pedestrian lighting within the public right-of-way. Furthermore, the Project would incorporate several design features, which include TDM measures to reduce the number of single occupancy trips to the Project Site, including implementation of a reduced parking supply, parking cash-out, promotions and marketing, bicycle parking facilities, and pedestrian network connections. Therefore, the Project would not conflict with this goal or objective or these policies.

Goal 13—A system of safe, efficient and attractive bicycle and pedestrian facilities.

Policy 13-1.1—Plan for and encourage funding and construction of bicycle facilities connecting residential neighborhoods to schools, open space areas, and employment centers.

Policy 13-1.2—Identify bicycle facilities along arterials in the community.

Policy 13-1.3—Assure that local bicycle facilities are linked with the facilities of neighboring areas of the City.

Policy 13.1.4—Encourage the provision of changing rooms, showers, and bicycle storage at new and existing and non-residential developments and public places.

As discussed in Section 2, Project Description, of this IS/MND, the Project would include a closed circuit camera system and keycard entry. The Project would provide proper lighting of the building and walkways to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into the building. The Project would also provide sufficient lighting of parking areas to maximize visibility and reduce areas of concealment. The Project would design building entrances and exits, open spaces, and pedestrian walkways to be open and in view of surrounding sites. Furthermore, the Project would also provide a pedestrian access path along Wilson Street and Sacramento Street, which would safely pull pedestrians from the adjacent right-of-way into the Project Site. In addition, the Project would provide a total of 98 bicycle parking spaces, including 63 long-term spaces and 35 short-term spaces, as well as bike storage and locker rooms to encourage bicycle use. Therefore, the Project would not conflict with this goal or these policies.

Objective 13-2—To promote pedestrian oriented mobility and the utilization of the bicycle for commuter, school, recreational use, economic activity, and access to transit facilities.

Policy 13-2.1—Encourage the safe utilization of easements and/or rights-of-way along flood control channels, public utilities, railroad rights-of-way, and streets wherever feasible for the use of bicycles and/or pedestrians.

Policy 13-2.2—Require the installation of sidewalks with all new roadway construction and significant reconstruction of existing roadways.

Goal 14—A sufficient system of well designed and convenient on-street parking and off street parking facilities throughout the Plan area.

Objective 14-1—To provide parking in appropriate locations in accord with Citywide standards and community needs.

Policy 14-1.1—Consolidate parking, where appropriate, to eliminate the number of ingress and egress points onto the arterial.

Policy 14-1.2—New parking lots and garages shall be developed in accordance with design standards.

As discussed in Section 2, Project Description, of this IS/MND, the Project would provide a total of 582 parking spaces in six above-ground parking levels that would be integrated into a podium and screened from view from public streets. The design of the driveways and parking areas would be compliant with LADOT standards. Furthermore, the Project would incorporate features such as separate pedestrian access paths as well pedestrian lighting and wayfinding signage to further enhance the pedestrian experience and safety of the Project Site. The Project would provide a total of 98 bicycle parking spaces, including 63 long-term spaces and 35 short-term spaces, as well as bike storage and locker rooms to encourage bicycle use. Therefore, the Project would not conflict with this goal or objective or these policies.

Downtown Los Angeles 2040 Community Plan

Policy LU 1.1—Ensure the development of complete neighborhoods with diverse uses and resilient infrastructure, parks, streetscapes, transit, and community amenities.

The Project proposes a mix of office, retail, and restaurant uses located within 0.25 mile of Metro Bus Lines 60 and 62 located at 7th Street and Decatur Street, and Metro Bus Line 66 located at Olympic Boulevard and Lawrence Street, which provide access for employees and visitors to the Project Site. The Project aims to enhance the existing Project Site by actively engaging with streets and public space and providing diverse uses to ensure the development of a complete neighborhood. Therefore, the Project would not conflict with this policy.

> Policy LU 9.7—Expand access to employment opportunities with improved physical connections to and within Downtown and expanded transit service to employment districts.

The Project would expand access to employment opportunities by locating office, retail, and restaurant uses within 0.25 mile of Metro Bus Lines 60 and 62 located at 7th Street and Decatur Street, and Metro Bus Line 66 located at Olympic Boulevard and Lawrence Street. Therefore, the Project would not conflict with this policy.

> Policy LU 11.1—Require active ground floors and street frontages that improve walkability and connectivity, especially between transit stations and nearby destinations.

As discussed in Section 2, Project Description, of this IS/MND, the proposed outdoor lobby, retail space, and café with outdoor seating areas located on the ground floor would further enhance the streetscape within the vicinity of the Project Site and promote linkages within the surrounding area. Further, pedestrian enhancements include improved sidewalks, street trees, publicly accessible open space, and landscaping to further activate the streetscape and improve the pedestrian experience. Therefore, the Project would not conflict with this policy.

> Policy LU 11.2—Encourage development that is well integrated with the public realm to create an inviting urban environment.

As discussed in Section 2, Project Description, of this IS/MND, the Project would enhance the public realm through streetscape improvements and unique architectural design materials. Specifically, the Project would provide new street trees and planters along Sacramento Street adjacent to the open-air lobby, which would improve the pedestrian experience along this street frontage. The proposed outdoor lobby, retail space, and café with outdoor seating areas located on the ground floor would further enhance the streetscape within the vicinity of the Project Site and promote linkages within the surrounding area. The activation of streetscape would enhance pedestrian activity on the ground floor and throughout the Project Site. In addition, the open-air lobby would be integrated with vibrant colors, accentuating the visual character of the Sacramento streetscape and further enhancing the pedestrian experience. Therefore, the Project would not conflict with this policy.

> Policy LU 11.4—Encourage building design that connects and orients people toward destinations and activity centers.

As discussed in Section 2, Project Description, of this IS/MND, the Project incorporates neighborhood serving ground floor commercial retail and restaurant uses to activate the streetscape and connect people towards destinations and activity centers. Therefore, the Project would not conflict with this policy.

> Policy LU 11.8—Promote compact development and encourage walking, biking, and transit use by encouraging no or minimal parking, when possible.

The Project would promote compact development by proposing a commercial development located near several existing and future development projects. The Project does not propose excess parking as compared to the LAMC requirements. Additionally, the Project would encourage alternative modes of transportation by providing a variety of TDM strategies, including reduced parking supply, parking cash-out, promotions and marketing, bicycle parking facilities, and pedestrian network connections. This would promote active transportation modes such as biking and walking. Additionally, the Project is located within 0.25 mile of Metro Bus Lines 60 and 62 located at 7th Street and Decatur Street, and Metro Bus Line 66 located at Olympic Boulevard and Lawrence Street, providing employees and visitors to the Project with public transportation alternatives. Therefore, the Project would not conflict with this policy.

> Policy LU 11.9—Encourage underground parking, when provided, to increase the amount of above grade building square footage dedicated to active uses and to improve the pedestrian environment.

As discussed in Section 2, Project Description, of this IS/MND, the Project would provide a total of 582 parking spaces in six above-ground parking levels that would be integrated into a podium and screened from view from public streets. In an effort to provide sustainability and flexibility in the design, parking levels would be adaptable for future additional office uses. The parking levels would be designed to adapt to future conditions through efficiencies in the design including a taller than usual floor-to-floor height that correlates to office use, and egress stairs and elevator cores designed to service the converted office levels. None of the proposed parking would be exposed to those traveling on adjacent streets. Therefore, the Project would not conflict with this policy.

> Policy LU 22.2—Foster and reinforce cohesive, pedestrian friendly, and inviting streetscapes that promote walking, bicycling, and transit use. Encourage the creative infill of landscaped setbacks and inoperative spaces, such as those resulting from inconsistent streetwalls.

As discussed in Section 2, Project Description, of this IS/MND, the Project includes the provision of pedestrian amenities including improved sidewalks, street trees, publicly accessible open space, an open-air lobby, and landscaping. Overall, the Project would be designed to actively engage with streets and public spaces. Therefore, the Project would not conflict with this policy.

> Policy LU 22.6—Encourage new developments to contribute to the pedestrian and open space network with publicly accessible plazas and paseos. Design these spaces with appropriate shade and landscaping.

The Project would incorporate neighborhood serving ground floor retail and restaurant uses near major corridors such as Alameda Street to help encourage pedestrian engagement. In addition, the Project would provide an open-air lobby and pedestrian network connections. Therefore, the Project would not conflict with this policy.

> Policy LU 22.9—Encourage an active, walkable environment through building design that incorporates active ground floor uses and streetscape elements that provide an enhanced pedestrian experience.

The Project would incorporate neighborhood serving ground floor retail and restaurant uses near major corridors such as Alameda Street to help encourage pedestrian engagement. In addition, the Project would install landscaping, including new street trees, to further activate the streetscape and improve the pedestrian experience. Therefore, the Project would not conflict with this policy.

> Policy MC 2.1—Establish a mode share goal of 75% for transit, walking, and biking for the year 2040 to improve the sustainability of Downtown's mobility network and increase access for residents, workers, and visitors.

Although Policy MC 2.1 sets a City goal for mode share and not a project-specific goal, the Project would be consistent with this policy. Specifically, the Project would support multi-modal mobility options such as biking and transit usage. Additionally, the Project design incorporates TDM measures such as reduced parking supply, parking cash-out, promotions and marketing, bicycle parking facilities, and pedestrian network connections to reduce the number of single occupancy vehicle trips to the Project Site. Therefore, the Project would not conflict with this policy.

> Policy MC 2.2—Implement strategies to reduce vehicle miles traveled per capita.

As discussed further below, the Project is estimated to generate lower work VMT per employee than average for the area. Furthermore, the Project would implement a TDM program to further reduce VMT capita. Specifically, TDM measures would include reduced parking supply, parking cash-out, promotions and marketing, bicycle parking facilities, and pedestrian network connections. Therefore, the Project would not conflict with this policy.

> Policy MC 2.5—Facilitate integration between different modes of travel to create a seamless experience as users switch between modes and to promote transit use and active transportation.

As discussed in Section 2, Project Description, of this IS/MND, the Project would provide a total of 98 bicycle parking spaces, including 63 long-term spaces and 35 short-term spaces. The Project would also provide bike storage and locker rooms. In addition, the Project is located within 0.25 mile of numerous Metro bus stops. Therefore, the Project would not conflict with this policy.

> Policy MC 4.2—Encourage residential and office buildings to provide bicycle related amenities such as repair stations and showers to facilitate cycling for residents, workers, and visitors.

As discussed in Section 2, Project Description, of this IS/MND, the Project proposes a mix of office, retail, and restaurant uses and would provide bicycle infrastructure, services, and amenities to encourage bicycling for employees and visitors to the Project Site. Therefore, the Project would not conflict with this policy.

Los Angeles Municipal Code

LAMC Section 12.21.A.16 details the bicycle parking requirements for new developments. The Project would require a total of 63 long-term and 35 short-term bicycle parking spaces. LAMC Section 12.21.A.16(a)(2) requires one short-term bicycle parking space per 10,000 square feet, and one long-term bicycle parking space per 5,000 square feet of office uses; one short-term and long-term bicycle parking

space per 2,000 square feet for restaurant and retail uses. Therefore, the Project's proposed long-term and short-term bicycle parking spaces would satisfy the LAMC requirements for on-site bicycle parking supply.

LAMC Section 12.26J, the TDM Ordinance (1993), establishes trip reduction requirements for non-residential projects in excess of 25,000 square feet. As discussed in Section 2, Project Description, of this IS/MND, the Project would develop a commercial building with office, restaurant, and retail uses resulting in a total floor area of approximately 290,900 square feet. As the Project would include non-residential uses greater than 25,000 square feet, the Project would be subject to the requirements of the TDM Ordinance. As discussed further below, the Project would incorporate TDM measures to encourage the use of alternative transportation modes by providing reduced parking, parking cash-out, marketing and promotions, bicycle parking, and pedestrian network connections, as well as concentrating development in proximity to multi-modal opportunities, consistent with the requirements set forth in the TDM Ordinance.

Vision Zero

Vision Zero implements projects that are designed to increase safety on the most vulnerable City streets. As discussed in the Transportation Assessment, the Project Site is not located adjacent to any corridor identified as part of the High Injury Network (HIN). Thus, the Project would not interfere with existing Vision Zero improvement projects, nor would the Project preclude future Vision Zero safety improvements by the City. Therefore, the Project would not conflict with Vision Zero.

Streetscape Plans

The Project is not located within the boundaries of any streetscape plan and, therefore, streetscape plans do not apply to this Project.

Citywide Design Guidelines

The Citywide Design Guidelines identify urban design principles to guide architects and developers in designing high-quality projects that meet the City's functional, aesthetic, and policy objectives and help foster a sense of community.[184] The design guidelines related to circulation include the following:

Guideline 1: Promote a safe, comfortable, and accessible pedestrian experience for all

As discussed in Section 2, Project Description, of this IS/MND, pedestrian access to the Project Site would be provided via access paths along Sacramento Street, which would safely pull pedestrians from the adjacent right-of-way into the Project Site. The ground floor of the building would feature publicly accessible areas, retail space, a café with outdoor seating areas, as well as an outdoor lobby with frontage along Sacramento Street and Wilson Street, which would activate the streetscape within the vicinity of the Project Site and promote linkages with the surrounding area. In addition, the open-air lobby would be integrated with vibrant colors, accentuating the visual character of the Sacramento streetscape and further enhancing the pedestrian experience. Thus, the Project would support this guideline.

[184] City of Los Angeles Department of City Planning, Urban Design Studio, Citywide Design Guidelines, October 2019.

Guideline 2: Carefully incorporate vehicular access such that it does not degrade the pedestrian experience.

As discussed in Section 2, Project Description, of this IS/MND, vehicular access to the Project Site would be provided via a primary drive off Sacramento Street, with through access to a rear driveway and fire-lane that provides ingress and egress out to Wilson Street. Pedestrian access to the Project Site would be provided via access paths along Sacramento Street, which would safely pull pedestrians from the adjacent right-of-way into the Project Site. Additionally, the proposed outdoor lobby would provide multiple access points for pedestrians along Sacramento Street and Wilson Street. Thus, the Project would support this guideline.

Guideline 3: Design projects to actively engage with streets and public space and maintain human scale.

As described above, The Project would enhance the public realm through streetscape improvements and unique architectural design materials. Specifically, the Project would provide new street trees and planters along Sacramento Street adjacent to the open-air lobby, which would improve the pedestrian experience along this street frontage. The proposed outdoor lobby, retail space, and café with outdoor seating areas located on the ground floor would further enhance the streetscape within the vicinity of the Project Site and promote linkages within the surrounding area. The activation of streetscape would enhance pedestrian activity on the ground floor and throughout the Project Site. In addition, the open-air lobby would be integrated with vibrant colors, accentuating the visual character of the Sacramento streetscape and further enhancing the pedestrian experience. Thus, the Project would support this guideline.

Based on the assessment set forth above, the Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Impacts would be less than significant and no mitigation measures are required.

b. Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Less Than Significant Impact. Section 15064.3 of the CEQA Guidelines describes specific considerations for evaluating a project's transportation impacts. As set forth therein, for land use projects, VMT exceeding an applicable threshold of significance may indicate a significant impact. Projects that decrease VMT in the project area compared to existing conditions should be presumed to have a less than significant impact. Projects that decrease VMT in the project area compared to existing conditions should be presumed to have a less than significant transportation impact. As discussed above, the Transportation Assessment was prepared in accordance with the assumptions, methodologies, and procedures outlined in the LADOT TAG. The TAG states that a commercial project would result in a potential VMT impact if it would generate work VMT per employee exceeding 15 percent below the existing average work VMT per employee for the Area Planning Commission (APC) area in which the project is located. Specifically, as identified in the Transportation Assessment, the Project Site is located in the Central APC area and is subject to the VMT impact threshold of 7.6 daily work VMT per employee.

In order to determine vehicle trips and VMT, the Transportation Assessment utilized the City of Los Angeles VMT Calculator Version 1.3. The VMT Calculator defines other types of trips generated by the Project, which include Non-Home-Based Other Production (trips to a non-residential destination

originating from a nonresidential use at the Project Site), Home-Based Other Attraction (trips to a non-workplace destination at the Project Site originating from a residential use), and Non-Home-Based Other Attraction (trips to a non-residential destination at the Project Site originating from a non-residential use). These trip types are not factored into the VMT per capita and VMT per employee thresholds, because these trip types are typically localized and are assumed to have a negligible effect on the VMT impact assessment. However, to ensure a conservative analysis for the Project, these trip types were factored into the calculation of total Project VMT for screening purposes when determining whether VMT analysis for the Project would be required.

The VMT Calculator also considers four types of Travel Behavior Zones (TBZs) to determine the magnitude of VMT and vehicle trip reductions that could be achieved through TDM strategies. The development of the TBZs considered the population density, land use density, intersection density, and proximity to transit of each Census tract in the City and are categorized as Suburban (Zone 1), Suburban Center (Zone 2); Compact Infill (Zone 3); and Urban (Zone 4). The VMT Calculator determines a project's TBZ based on the latitude and longitude of a project address. As identified in the Transportation Assessment, the Project Site is located in a Suburban Center (Zone 2) TBZ, which is described as comprised of low-density developments with a mix of residential and commercial uses with larger blocks and lower intersection density.

The Project would comply with the requirements of the City's TDM ordinance by implementing a TDM program to reduce VMT per capita. The VMT Calculator accounted for the Project's TDM measures, which include a reduced parking supply, parking cash-out, promotions and marketing, bicycle parking per LAMC, and pedestrian network improvements. Based on the VMT Calculator results (see Appendix D of the Transportation Assessment), the Project would generate 2,668 daily vehicle trips and a total daily VMT of 20,274. The VMT Calculator also estimates that the Project would generate 1,153 employees and a total home-based work attraction VMT of 8,150. Thus, the Project would generate an average work VMT per employee of 7.4. The average work VMT per employee would not exceed the Central APC significant work VMT impact threshold of 7.6. Therefore, Project-level potential impacts with regard to VMT pursuant to CEQA Guidelines Section 15064.3 and LADOT TAG would be less than significant, and no mitigation measures are required.

c. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact. Impacts regarding the potential increase of hazards due to a geometric design feature generally relate to the design of access points to and from a project site, and may include safety, operational, or capacity impacts. Impacts can be related to vehicle/vehicle, vehicle/bicycle, or vehicle/pedestrian conflicts as well as to operational delays caused by vehicles slowing and/or queuing to access a project site. These conflicts may be created by the driveway configuration or through the placement of project driveway(s) in areas of inadequate visibility, adjacent to bicycle or pedestrian facilities, or too close to busy or congested intersections. Based on the TAG, further evaluation is required for projects that require a discretionary action and (1) propose new driveways or introduce new vehicle access to the property from a public right-of-way or (2) propose any voluntary or required modifications to the public right-of-way (i.e., street dedications, reconfigurations of curb line, etc.). The Project requires further evaluation based on these screening criteria.

As discussed in Section 2, Project Description, of this IS/MND, vehicular access to the Project Site would be provided via a primary driveway off of Sacramento Street, with through access to a rear driveway and fire-lane that provides ingress and egress out to Wilson Street. The Project is requesting a Waiver of Dedication and Improvement for both Sacramento Street and Wilson Street to maintain the existing roadway and ROW widths. Bicycle and pedestrian access to the Project Site would be provided separately from the vehicular driveways via commercial entrances along Sacramento Street. All driveways and access points would be designed consistent with LADOT standards and all ADA requirements. The Project would conform to all design element requirements along the Project frontages to encourage walking and enhance the pedestrian environment.

The Project would not increase the number of existing curb cuts along the Sacramento Street frontage. Furthermore, the Project would improve an existing curb cut to meet current LADOT standards for commercial driveways. The Project would also introduce a new curb cut along Wilson Street that would accommodate emergency and service access only. The driveway along Sacramento Street would be placed to provide adequate sight distance in relation to curvatures in the roadway. In addition, the design would not locate impediments that would affect visibility of approaching vehicles, pedestrians, or bicycles. The vehicular driveways would intersect Sacramento Street at a right angle, to maximize sight distance. The driveway along Wilson Street would be designed in accordance with the City's emergency and service access requirements. Access control systems at the driveways would be placed to maximize queuing capacity internal to the Project Site and limit the potential for queue spillover into the public ROW.

None of the Project frontages are located along a Modal Priority Network of the Mobility Plan. The Project design would not result in any impediments to the visibility of approaching vehicles, pedestrians, or bicycles, and the vehicular driveways would intersect Sacramento Street and Wilson Street at right angles, to the extent possible, to maximize sight distance and be designed to City standards. In addition, the Project would not preclude or interfere with the implementation of future roadway improvements benefiting transit, pedestrians, or bicycles. While the Project would result in a modest increase in both bicycle and pedestrian activity along Sacramento Street, the access locations would be designed to accommodate adequate sidewalks and enhanced connectivity that meet the City's requirements to further protect bicycle and pedestrian safety. The driveways would not cross any existing bicycle infrastructure and adequate sight distance exists for drivers entering and/or exiting driveways to see oncoming bicyclists and pedestrians. Therefore, the Project is not anticipated to result in significant vehicle/pedestrian or vehicle/bicycle conflicts.

With regard to freeway safety, LADOT's Freeway Guidance requires that a transportation assessment for a development project include analysis of any freeway off-ramp where the project adds 25 or more peak hour trips. A project would result in a significant impact at such a ramp if each of the following three criteria were met: 1) Under a scenario analyzing future conditions upon project buildout, with project traffic included, the off-ramp queue would extend to the mainline freeway lanes; 2) A project would contribute at least two vehicle lengths (50 feet, assuming 25 feet per vehicle) to the queue; and 3) The average speed of mainline freeway traffic adjacent to the off-ramp during the analyzed peak hour(s) is greater than 30 mph. The Project is located approximately 0.2 mile north of I-10. The Project exceeds the City's freeway safety analysis screening threshold of 25 net new morning peak hour trips at the I-10 Westbound Off-Ramp to 8th Street. Thus, in accordance with LADOT's Freeway Guidance, further freeway ramp safety analysis was conducted for Future without Project Conditions and Future with Project Conditions Year 2026 (the anticipated Project buildout). As detailed in the Transportation Assessment, under Future with Project Conditions, the queue at the off-ramp would not exceed the ramp storage length

and the Project would not add 50 feet or more to any queue during any of the analyzed peak hours compared to Future without Project Conditions. Thus, the Project would not result in a significant freeway safety impact.

In addition, the proposed uses would also be consistent with the surrounding uses (i.e., industrial and commercial) and would not introduce hazards due to incompatible uses. Therefore, based on the above, the Project would not substantially increase hazards due to a geometric design feature or incompatible uses. Impacts would be less than significant, and no mitigation measures are required.

d. Would the project result in inadequate emergency access?

Less Than Significant Impact. While it is expected that the majority of Project construction activities would be confined to the Project Site, limited off-site construction activities may occur within adjacent street right-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access, as discussed in Project Design Feature TR-PDF-1 below. With regard to operation, the Project would not require the permanent closure of any local public or private streets and would not impede emergency vehicle access to the Project Site or surrounding area. In addition, the Project would comply with LAFD access requirements and applicable LAFD regulations regarding safety. Specifically, the Project would implement a fire lane with through access to Wilson Street. Therefore, the Project would not result in inadequate emergency access, and impacts regarding Threshold (d) were determined to be less than significant, and no mitigation measures are required.

Project Design Feature

Project Design Feature TR-PDF-1: Prior to the start of construction, the Project Applicant will prepare a Construction Management Plan, including haul routes and a staging plan, and submit it to the City for review and approval. The Construction Management Plan would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The Construction Management Plan will be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and will include, but not be limited to, the following elements, as appropriate:

- Advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation;
- Temporary pedestrian, bicycle, and vehicular traffic controls during all construction activities on Sacramento Street to ensure traffic safety on the public ROW. These controls shall include, but not be limited to, flag people trained in pedestrian and bicycle safety;
- Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets;
- Spacing of trucks so as to discourage a convoy effect;
- Containment of construction activity within the Project Site boundaries to the extent feasible;

- Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers shall be implemented as appropriate;
- Scheduling of construction-related deliveries, haul trips, etc., to occur outside the commuter peak hours;
- Maintenance of a log, available on the job site at all times, documenting the dates of hauling and the number of trips (i.e., trucks) per day;
- Identification of a construction manager and provision of a telephone number for any inquiries or complaints from residents regarding construction activities. The telephone number shall be posted at the site readily visible to any interested party during site preparation, grading, and construction.

XVIII. TRIBAL CULTURAL RESOURCES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☒	☐	☐
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

The following analysis is based on the Tribal Cultural Resources Assessment (TCR Report) prepared for the Project by SWCA, dated March 21, 2023, and included as Appendix IS-13 of this IS/MND. The impact analysis is also based on a Sacred Lands File (SLF) records search conducted by the California Native American Heritage Commission (NAHC) and a California Historical Resources Information System (CHRIS) records search conducted by the South Central Coastal Information Center (SCCIC) at California State University Fullerton, both of which are appended to the TCR Report, as well as consultation with the Gabrieleño Band of Mission Indians—Kizh Nation pursuant to AB 52.

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: Listed or

eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?

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

Less Than Significant Impact with Mitigation Incorporated.

In compliance with AB 52 (PRC 21074), which requires tribal consultation as part of the CEQA process, the City mailed a project notification letter to the Gabrieleño Band of Mission Indians—Kizh Nation (Tribe) on December 2, 2022. On December 8, 2022, the City received the Tribe's request for tribal consultation. The City emailed the Tribe on December 8, 2022, requesting a date and time to initiate the AB 52 consultation for the Project and emailed a follow up email on December 13, 2022, to request a date and time for the AB 52 consultation. The Tribe emailed on January 10, 2023, offering consultation via email due to the Tribe's schedule. The Tribal consultation process commenced on January 10, 2023, via email. The Tribe submitted Historical maps from 1871, 1881, 1898, 1920 and 1938 with background information related to resources in the vicinity of the Project Site. The background information included, but was not limited to, excerpts from physical texts regarding indigenous settlements and history, as well as archival letter responses. The Kizh Nation also provided the City with AB 52 regulatory information, including mitigation language for consideration for the management of TCRs based on this information. The tribal consultation concluded on March 29, 2023, in accordance with AB 52. The confidential record of AB 52 consultation is on file with the City.

Included in Appendix IS-13 of this IS/MND, SWCA conducted a sensitivity assessment to determine the potential for tribal cultural resources that are archaeological in nature to be preserved below the surface of the Project Site. Although not all tribal cultural resources are archaeological in nature, those likely to be preserved below the surface are likely to fit the definition of archaeological and tribal cultural resources. The location of buried archaeological deposits, including those that are potential tribal cultural resources, is unpredictable in nature; however, combining information from different sources can allow for a qualitative assessment of the likelihood for tribal cultural resources to be present within a given area or Project Site. The sensitivity assessment essentially combines two variables: indications of intensive use and preservation conditions. Areas with a favorable setting for habitation or use, soil conditions capable of preserving buried material, and little to no disturbances are considered to have high sensitivity. Areas lacking these traits are considered to have low sensitivity. Lastly, areas with a combination of these traits are generally considered to have moderate sensitivity.

To assess these variables, SWCA considers archaeological, ethnographic, historical, environmental, and other archival data resources. Archaeological site data include those identified in the CHRIS records search and supplemental background research. While the CHRIS results were negative, the results are analyzed in further detail to determine to what degree the absence of site information is the result of no resources having been identified or that no archaeological investigation took place. SWCA conducted

supplemental background research focusing on Native American land uses and settlement patterns in the region, as well as the effects of agriculture and urban development. Several Native American sites were identified in the vicinity of the Project Site, the closest of which are Geveronga and Yaanga.

As discussed in the TCR Report, the Gabrielino settlement known as Yaanga is estimated to have been located in the area between the Los Angeles Plaza and present-day Union Station, approximately 1.5 miles north of the Project Site. Far less is known about the other nearby settlement known as Geveronga, which is estimated to have been located somewhere west of Yaanga. The best estimates of its former location place it in a drainage basin formed along the toeslopes of the Elysian Hills, approximately 2 miles northwest of the Project Site. Collectively, these former Native American settlements are considered to have been located too far from the Project Site such that a buried tribal cultural resource directly associated with their occupation is likely to be located within the Project Site. Rather, the presence of pre-Spanish period settlements suggests that certain locations of what is now downtown Los Angeles were indeed important for past Native American communities, and there were some degree of increased activity focused here, but within a broad and more generalized area. Accordingly, the influence on sensitivity for a buried tribal cultural resource is considered to be similarly generalized across the downtown Los Angeles area, with only a minor influence on the comparatively smaller Project Site.

The Project Site is located approximately 0.4 mile west of the Los Angeles River and is located within the river's historical floodplain. Shifts in the main channel of the Los Angeles River have occurred numerous times in recorded history, including two significant shifts in 1815 and 1825. The first recorded shift of the river occurred in 1815 when floodwaters overflowed the former channel, shifting the course at least 0.5 mile to the southwest, near the present route of Spring Street. The flood is said to have flooded all or part of the Native American site of Yaanga, which is believed to have been located nearby.

The Project Site is on the southeastern portion of the City's original 1849 annexation boundary. Maps and historical accounts characterize the Project Site and surroundings as open fields used for livestock grazing and growing corn. The first development identified within the Project Site are single-family residences, present by 1906. The Project Site was subject to redevelopment prior to 1921 during which time several Historic-period buildings were constructed and demolished. These construction-demolition episodes have compromised the integrity of the physical setting and likely destroyed or displaced any tribal cultural resources that may have been deposited on the surface or shallowly buried.

It has been demonstrated elsewhere in the downtown portion of Los Angeles that deeply buried archaeological deposits can exist within alluvium below Historic-period disturbances and may also be intermixed with Historic-period debris. Most accumulations of alluvial sediments were formed by a combination of high- and low-energy events. High-energy events are less likely to have preserved any material remains left on the surface by Native Americans, while low-energy floods tend to produce more favorable environments for the preservation of cultural materials. Thus, low-energy alluvial sediments dating to the late Pleistocene or Holocene time periods have the greatest potential for preserving tribal cultural resources. The Project Site is mapped within a geologic unit composed of alluvium deposited between the late Pleistocene to possibly early Holocene, which can be favorable for the preservation of a deeply buried tribal cultural resource. However, given the horizontal extent and depth of this geologic unit and those of similar composition and age within the Los Angeles Basin, the presence of these sediments alone is not sufficient evidence to suggest a strong influence on the tribal cultural resource sensitivity directly within the Project Site. Rather, it demonstrates that there is at least a low level of potential for a

deeply buried resource. The CHRIS records search results identified a site in which a 3,600 year-old femur from a Native American (P-19-004662) was recovered 19 feet below the surface within the Los Angeles River floodplain. The bone found in isolation and in a sediment matrix typical of high-energy deposition strongly suggests the bone was redeposited from another location. In contrast, archaeological deposits that may have once been on the surface or shallowly buried are very unlikely to be preserved where excavation for large-scale grading occurred within the Project Site.

The deposit of alluvial sediments within the Los Angeles River floodplain is capable of preserving deposits of archaeological materials where low-energy flood events occur; however, high-energy flood events create settings that are very unlikely to preserve archaeological remains. Given the intensive modifications to the surface and subsurface within the Project Site, SWCA concluded that the Project Site `has a low-sensitivity for containing archaeological resources affiliated with Native Americans. In addition, a review of the information provided by the Kizh Nation during the consultation process did not find substantial evidence of a known and documented existing tribal cultural resource within the Project Site. Notwithstanding, given the past history of Native American occupation in the Los Angeles area and greater southern California region, and in light of the general proximity of the Project Site to known villages, roads, and the Los Angeles River, as well as the input from the tribal representatives, it is concluded that Project construction activities could potentially unearth or otherwise disturb buried tribal cultural resources. As such, out of an abundance of caution to provide maximum protection against inadvertent encounters with previously unidentified tribal cultural resources, the Project shall incorporate Mitigation Measures TRI-MM-1 through TRI-MM-3. With implementation of Mitigation Measures TRI-MM-1 through TRI-MM-3, any potential impacts to tribal cultural resources would be less than significant.

Mitigation Measure TRI-MM-1: Prior to the issuance of a demolition permit, the Applicant shall retain a Native American Monitor from the Gabrieleño Band of Mission Indians–Kizh Nation (Kizh Nation or Tribe) who shall be present during construction ground disturbance activities, including demolition, pavement removal, clearing/grubbing, drilling/augering, potholing, grading, trenching, excavation, tree removal or other ground disturbing activity associated with the Project. The activities to be monitored may also include off-site improvements in the vicinity of the Project site, such as any ground disturbing activities associated with utilities, sidewalks, or road improvements. A monitoring agreement between the Applicant and Kizh Nation shall be prepared that outlines the roles and responsibilities of the Native American Monitor and shall be submitted to the City prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity. The Native American Monitor shall also provide a Workers Environmental Awareness Program (WEAP) training to construction personnel. The Native American Monitor, in coordination with the qualified Archaeologist and archaeological monitor shall have the authority to direct the pace of construction equipment activity in areas of higher sensitivity and to temporarily divert, redirect or halt ground disturbance activities to allow identification, evaluation, and potential recovery of tribal cultural resources. Full-time monitoring may be reduced to part-time inspections, or ceased entirely, if determined appropriate by the Native American Monitor in the event there appears to be little to no potential for impacting tribal cultural resources. Native American monitoring shall conclude upon the latter of the following: (1) written confirmation to the Kizh Nation from a designated point of contact for the Applicant or Lead Agency that all ground-disturbing activities and phases that may involve ground disturbing activities on the Project Site or in connection with the Project are complete; or (2) a determination and written notification by the Kizh Nation to the

Project Applicant/Lead Agency that no future, planned construction activity and/or development/construction phase at the Project site possesses the potential to impact tribal cultural resources.

Mitigation Measure TRI-MM-2: The Native American Monitor shall complete daily monitoring logs that provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs shall identify and describe any discovered tribal cultural resources, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs shall be provided to the Project Applicant/Lead Agency upon written request to the tribe.

Mitigation Measure TRI-MM-3: In the event that prehistoric/Native American (e.g., hearths, stone tools, shell and faunal bone remains, etc.) archaeological resources are unearthed, ground disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. An appropriate buffer area shall be established by the Native American Monitor and archaeological monitor in accordance with industry standards, reasonable assumptions regarding the potential for additional discoveries in the vicinity, and safety considerations for those making and evaluation and potential recovery of the discovery. This buffer area shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. A meeting shall take place between the Applicant, the qualified Archaeologist, the Gabrieleño Tribe, and the City to discuss the significance of the find and whether it qualifies as a tribal cultural resource pursuant to Public Resources Code Section 21074(a). If, as a result of the meeting and after consultation with the Gabrieleño Tribe and the qualified Archaeologist, a decision that the resource is in fact a tribal cultural resource, a treatment plan shall be developed by the Gabrieleño Tribe, with input from the qualified Archaeologist as necessary, and with the concurrence of the City's Planning Director or his/her designee. The treatment measures in the treatment plan shall be implemented prior to construction work continuing in the buffer around the find. The preferred treatment is avoidance, but if not feasible may include, but would not be limited to, capping in place, excavation and removal of the resource and follow-up laboratory processing and analysis, interpretive displays, sensitive area signage, or other mutually agreed upon measures. The treatment plan shall also include measures regarding the curation of the recovered resources. The recovered prehistoric or Native American resources may be placed in the custody of the Gabrieleño Tribe, who may choose to use them for their educational purposes or they may be curated at a public, non-profit institution with a research interest in the materials. If neither the Gabrieleño Tribe nor institution accepts the resources, they may be donated to a local school or historical society in the area for educational purposes.

XIX. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c. 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?	☐	☐	☒	☐
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

The following analysis is based, in part, on the Utilities Infrastructure Technical Report prepared for the Project by KPFF Consulting Engineers dated September 7, 2023; and the Water Supply Assessment (WSA) prepared for the Project by LADWP dated March 7, 2023. All specific information regarding historic and existing on-site conditions in the discussion below is from these reports unless otherwise noted. The reports are included as Appendix IS-14 and Appendix IS-15 of this IS/MND, respectively.

a. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact. Water and electrical service to the Project Site is provided by the Los Angeles Department of Water and Power (LADWP), sewer service is provided by LA Sanitation & Environment (LASAN), stormwater drainage is overseen by the LADWP, and natural gas service is provided by SoCalGas. In addition, electricity transmission to the Project Site is provided and maintained by LADWP, natural gas service is provided to the Project Site by the SoCalGas, and telecommunications services are provided by AT&T, DirecTV, Dish Network, Frontier Communications, Charter Spectrum, and Verizon. These services are provided by existing water, sewer, electrical, natural gas and telecommunications infrastructure currently extending to the Project Site from existing mains and

distribution lines within the right-of-way of the surrounding roads, and by existing on-site storm drainage infrastructure.

Water

The Los Angeles Department of Water and Power (LADWP) provides water service for domestic and fire protection uses. Available records provided by the City indicate a 6-inch water mainline in Sacramento Street. When analyzing the Project for infrastructure capacity, the projected demands for both fire suppression and domestic water are considered. Although domestic water demand is the Project's main contributor to water consumption, fire flow demands have a much greater instantaneous impact on infrastructure, and therefore are the primary means for analyzing infrastructure capacity.

A Service Advisory Requests (SAR) was submitted to LADWP to test the proposed water connection serving the Project Site. Based on the SAR that was approved by the City in July 2023, the existing and proposed water infrastructure can meet the water infrastructure needs of the Project. In addition, Project-related infrastructure would be designed and installed to meet all applicable City requirements. Thus, with the proposed improvements identified in the Water and Wastewater Infrastructure Study, the water infrastructure system would be adequate to serve the Project Site. As discussed in the Utility Report, included as Appendix 14 of this IS/MND, the IFFAR submitted to LADWP show there would be insufficient capacity in the existing water infrastructure system under a 12,000 gpm fire flow, and system upgrades would be necessary to meet the fire flow demand for the Project. As part of the Project, required water service upgrades necessary to achieve the adequate fire flow would be implemented. As detailed below in Project Design Feature WAT-PDF-1, such upgrades are anticipated to involve replacing existing water mains in the vicinity under as required by LADWP or pay in-lieu fees to LADWP for the improvements. With the implementation of Project Design Feature WAT-PDF-1, public water infrastructure would provide adequate water pressure to serve the Project site's anticipated water demand.

Project Design Feature WAT-PDF-1: The Project will replace the existing water mains in in the vicinity of the Project Site to increase fire flow protection based on a 12,000 gpm fire flow as determined necessary by LADWP and LAFD.

Wastewater

The Wastewater generated by the Project would be conveyed via the existing wastewater conveyance systems for treatment at the Hyperion Water Reclamation Plant (HWRP). The HWRP has a capacity of 450 million gallons per day (mgd), and current average wastewater flows are at approximately 275 mgd. Accordingly, the remaining available capacity at the HWRP is approximately 175 mgd.[185]

As discussed in the Utility Infrastructure Technical Report, a Wastewater Service Information (WWSI) Response, included in the Utility Infrastructure Technical Report, was obtained from LASAN to evaluate the capability of the existing wastewater system to serve the Project's estimated wastewater flow. As set forth in the WWSI, based on the current approximate flow levels and design capacities in the sewer system and the Project's estimated wastewater flow, the City determined that the existing capacity of the

[185] LASAN, Treatment Process, https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp-tp?_adf.ctrl-state=1e9ltuxk0_5&_afrLoop=1690868518519671#!, accessed June 1, 2023.

sewer system might be able to accommodate the additional wastewater infrastructure demand created by the Project. In addition, Project-related sanitary sewer connections and on-site infrastructure would be designed and constructed in accordance with applicable LASAN and California Plumbing Code standards. Therefore, the Project would not cause a measurable increase in wastewater flows at a point where, and at a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained.

A Sewer Capacity Availability Report (SCAR) application was submitted to address discharge of the Project's wastewater demand. The purpose of the SCAR is for the City to evaluate the existing public sewer systems to determine if adequate capacity is available to safely convey sewage from proposed development projects. Using sewage generation factors established by the Department of Public Works, Bureau of Engineering, the SCAR application prepared by KPFF estimated that that the Project would generate approximately 52,354 gallons per day (gpd) or approximately 0.052 mgd of wastewater upon completion.

As set forth in the approved SCAR included as part of the Utilities Infrastructure Technical Report, the City has approved the Project to discharge up 52,354 gallons per day and the wastewater system would be able to accommodate the Project based on the wastewater connections described above. Specifically, the SCAR accounts for the proposed uses of the site and does not anticipate additional capacity is needed for water uses such as cooling towers and landscaping. Therefore, sufficient capacity exists in the sewer system after accounting for required water savings and taking into account water uses that do not directly discharge to the sanitary sewer system. Thus, impacts associated with wastewater infrastructure would be less than significant, and no mitigation measures are required.

Stormwater

As previously discussed under Checklist Question No. X, Hydrology and Water Quality, with implementation of the Project, the Project Site would maintain the overall percentage of impervious area (approximately 100 percent). In addition, the Project would comply with the City's LID Ordinance, which requires that post-construction stormwater runoff from new projects must be infiltrated, evapotranspirated, captured and used, and/or treated through high efficiency BMPs on site for the volume of water produced by the greater of the 85th percentile storm event or the 0.75-inch storm event (i.e., "first flush"). Consistent with LID requirements to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site, the Project would include the installation of infiltration BMPs as established by the LID Manual. As such, the Project would not require or result in the relocation or construction of new or expanded stormwater drainage. Impacts would be less than significant, and no mitigation measures are required.

Electricity and Natural Gas

Electricity transmission to the Project Site is provided and maintained by LADWP through a network of utility poles and underground utility lines.

Construction of the Project's electrical infrastructure would primarily occur within the Project Site with the possible need for off-site connections to the electrical system adjacent to the Project Site. Where feasible, the new electrical service installations and connections would be scheduled and implemented in a manner that would not result in electrical service interruptions to other properties. The Applicant would

also be required to coordinate electrical infrastructure removals or relocations with LADWP and comply with site-specific requirements set by LADWP, which would ensure that service disruptions and potential impacts associated with grading, construction, and development within LADWP easements are minimized. As such, construction of the Project's electrical infrastructure is not anticipated to adversely affect the electrical infrastructure serving the Project Site and surrounding uses or utility system capacity.

Since LADWP has been serving the Project Site's existing uses, construction of the Project would not result in an increase in demand for electricity that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Therefore, construction-related impacts to electricity supply and infrastructure would be less than significant, and the use of electricity during project construction would not be wasteful, inefficient, or unnecessary.

Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support Project construction activities. Thus, there would be no demand generated by construction. In addition, the Project would be required to comply with the City of Los Angeles All Electric Building Code which does not permit the installation of any natural gas or combustion powered equipment during operations. Furthermore, prior to ground disturbance, Project contractors would notify and coordinate with SoCalGas to identify the locations and depth of all existing gas lines and avoid disruption of gas service to other properties. Adequate and safe vehicular and pedestrian access within the Project Site and immediately surrounding the Project Site would also be maintained in accordance with a construction management plan to be implemented for the Project. Therefore, construction of the Project would not result in an increase in demand for natural gas that would affect available supply or distribution infrastructure capabilities and would not result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Construction-related impacts to natural gas supply and infrastructure would be less than significant.

As detailed above under Checklist Question No. VI, with buildout of the Project, the on-site electricity demand would increase by approximately 7,502,027 kWh of electricity per year. The Project's electricity demand would represent approximately 0.032 percent of LADWP's projected sales in 2026. LADWP has confirmed that the Project's electricity demand can be served by the facilities in the Project area.[186] As discussed above, the Project would also incorporate a variety of energy conservation measures to reduce energy usage as set forth by Los Angeles Green Building Code, and CALGreen/Title 24. Therefore, it is expected that LADWP's existing and planned electricity capacity and electricity supplies would be sufficient to support the Project's electricity demand.

Telecommunications

With respect to telecommunications facilities, the Project would require installation of new on-site telecommunications infrastructure to serve new buildings and potential upgrades and/or relocation of existing telecommunications infrastructure. Communication and television cable systems located in the Project area include underground fiber optic cable, telephone transmission lines (overhead and underground), and cellular towers owned or leased by telecommunications service providers. It is

[186] LADWP, Will Serve, 1811 Sacramento Street, dated January 25, 2023. Refer to Appendix IS-14 of this IS/MND.

assumed that all such infrastructure exists on or otherwise serves the Project Site. Installation would occur during construction of the Project. Impacts associated with the installation of telecommunications infrastructure would primarily involve trenching in order to place the lines below surface. However, the Project would ensure vehicle and pedestrian access is maintained throughout construction. In addition, when considering impacts resulting from the installation of any required telecommunications infrastructure, all impacts are of a relatively short duration (i.e., months) and would cease to occur when installation is complete. Installation of new telecommunications infrastructure would be limited to on-site telecommunications distribution and minor off-site work associated with connections to the public system. No upgrades to off-site telecommunications systems are anticipated. Any work that may affect services to the existing telecommunications lines would be coordinated with service providers and the City as applicable. As such, the Project would not require or result in the relocation or construction of new or expanded telecommunications facilities. Impacts would be less than significant, and no mitigation measures are required.

Conclusion

Based on the above, the Project is not anticipated to exceed the available capacity of the utility distribution/collection infrastructure and wastewater treatment infrastructure currently serving the Project Site. Therefore, the Project would not require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects. Impacts would be less than significant, no mitigation is required, and no further discussion in an EIR is required.

b. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less Than Significant Impact.

LADWP provides water service to the Project Site. Water is supplied to the City from four primary sources: the Los Angeles Aqueducts, local groundwater, the Metropolitan Water District of Southern California (MWD), and recycled water. LADWP's 2020 Urban Water Management Plan provides water supply and demand projections in five-year increments to 2045, based on the demographic growth projections in SCAG's 2020–2045 RTP/SCS. The 2020 Urban Water Management Plan takes into account the realities of climate change and the concerns of drought and dry weather and notes that the City will meet all new demand for water due to projected population growth through a combination of water conservation and water recycling. Based on LADWP's 2020 Urban Water Management Plan water demand projections through 2040, projected water demand for the City would be met by the available supplies during an average year, single-dry year, and multiple-dry year through the year 2045, as well as the intervening years (i.e., the Project buildout year of 2026).[187]

A Water Supply Assessment (WSA) was approved for the 1811 Sacramento Street Project by the LADWP Board of Commissioners on March 7, 2023, and is included in Appendix IS-15. According to the WSA,

[187] Metropolitan Water District of Southern California, 2020 Regional Urban Water Management Plan, June 2021, www.mwdh2o.com/planning-for-tomorrow/how-we-plan/, accessed June 1, 2023.

and as shown in Table 26 on page 179, the projected total net water demand increase for the Project is estimated to be 91 acre feet (AF) annually, equating to 80,925 gpd. The demand calculation considered water conservation ordinances for a savings of 17 AF per year and 1 AF per year for voluntary conservation measures. As stated in the WSA, the additional water demand of 91 AF per year has been accounted for in the City's overall total demand projections in LADWP's 2020 Urban Water Management Plan using a service area-wide approach that does not rely on individual development demand. Furthermore, as stated in the WSA, the Project is consistent with the demographic forecasts for the City from the 2020 SCAG RTP/SCS. Therefore, LADWP has determined that the Project water demand is included in the LADWP 2020 UWMP which forecasts adequate water supplies to meet all projected water demands in the City through the year 2045. As such, it is anticipated that sufficient water supplies will be available to serve the Project, and no new or expanded water entitlements will be needed. Impacts would be less than significant, and no mitigation measures are required.

c. Would the project 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?

Less Than Significant Impact. The Hyperion Water Reclamation Plant, which provides water treatment for the Project Site, has a current remaining capacity of 175 mgd.[188] The Project's net increase in average daily wastewater flows of approximately 65,499 gallons per day, as estimated in the Utilities Infrastructure Technical Report included in Appendix IS-14, would represent approximately 0.034 percent of the available capacity of the Hyperion Water Reclamation Plant. Therefore, based on the amount of wastewater expected to be generated by the Project, and future wastewater treatment capacity of the Hyperion Water Reclamation Plant, adequate wastewater treatment capacity would be available to serve the Project Site together with projected future demand and existing commitments. As such, impacts on the wastewater treatment provider would be less than significant, and no mitigation measures are required.

d. Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. While the LASAN generally provides waste collection services to single-family and some small multi-family developments, private haulers permitted by the City provide waste collection services for most multi-family residential, commercial, and institutional developments within the City. Solid waste transported by both public and private haulers is either recycled, reused, or transformed at a waste-to-energy facility, or disposed of at a landfill. Landfills within Los Angeles County are categorized as either Class III (e.g., landfills permitted to accept non-hazardous and non-designated solid waste) or inert waste landfills. Non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste, such as construction waste, yard trimmings, and earth-like waste, is disposed of in inert

[188] LASAN, Hyperion Water Reclamation Plant, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=6jxqihq40_254&_afrLoop=5327340718723642#!, accessed June 1, 2023.

Table 26
Estimated Project Water Consumption

Land Use	No. of Units/ Floor Area	Water Consumption Rate (gpd/unit)[b]	Total Water Consumption (gpd)
Existing			
Warehouse/Self-Storage	40,479 sf		
Total Exist in[ga]	**40,479 sf**		**336**[a]
Proposed			
Office (Interior and Exterior Covered)	277,700 sf	0.12	33,324
Office (Exterior Uncovered)	25,500 sf	0.12	3,060
Retail	5,200 sf	0.025	130
Restaurant/Café	528 seats	30.00	15,840
Base Demand Adjustment[d]			1,474
Required Ordinances Water Savings for Buildings[c]			(6,037)
Landscaping[e]	6,551 sf		629
Required Ordinances Water Savings for Landscaping			(346)
Covered Parking[f]	173,100 sf	0.02	114
Cooling Tower	1,200 tons	35.64	42,768
Required Ordinances Water Savings for Cooling Tower			(8,554)
Total Proposed			**82,402**
Less Existing to be Removed			**(336)**
Voluntary Conservation Measures			**(1,141)**
Net Water Consumption (Proposed – Existing – Voluntary Conservation Measures)			**80,925**

sf = square feet

gpd = gallons per day

[a] *The existing water demand is based on the 5-year billing data from December 2016 to November 2021.*

[b] *Based on sewage generation rates provided by the City of Los Angeles Bureau of Sanitation (2012).*

[c] *The proposed development land uses will conform to City of Los Angeles Ordinance No. 186488, 184248, 2020 Los Angeles Plumbing Code, and 2020 Los Angeles Green Building Code.*

[d] *Base Demand Adjustment is the estimated savings due to Ordinance No. 180822 accounted for in the current version of Bureau of Sanitation Sewer Generation Rates.*

[e] *Landscaping water use is estimated per California Code of Regulations Title 23. Division 2. Chapter 2.7. Model Water Efficient Landscape Ordinance.*

[f] *Auto parking water uses are based on City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates table, and 12 times/year cleaning assumption.*

Source: LADWP, Water Supply Assessment—1811 Sacramento Street Project, March 2023.

waste landfills.[189] Ten Class III landfills and one inert landfill are currently operating within the County.[190] In addition, there is one solid waste transformation facility within Los Angeles County (Southeast Resource Recovery Facility) that converts, combusts, or otherwise processes solid waste for the purpose of energy recovery.[191]

Based on the 2020 Countywide Integrated Waste Management Plan (ColWMP) Annual Report, the most recent report available, the total remaining permitted Class III landfill capacity in the County is estimated at 142.67 million tons, with a total estimated daily disposal rate of 36,544 tons per day, and the remaining lifespan of each landfill ranges from 8 to 35 years. The estimated remaining capacity for the County's Class III landfills open to the City of Los Angeles is approximately 132.58 million tons as of December 31, 2020.[192] In addition, the permitted inert waste landfill serving the County is the Azusa Land Reclamation.[193] This facility has 64.64 million tons of remaining capacity and an average daily in-County disposal rate of 1,032 tons per day.[194] Los Angeles County continually evaluates landfill disposal needs and capacity through preparation of the CoIWMP Annual Reports. Within each annual report, future landfill disposal needs over the next 15-year planning horizon are addressed in part by determining the available landfill capacity.[195]

The following analysis quantifies the Project's construction and operational solid waste generation.

Construction

As summarized in Table 27 on page 181, to provide for the proposed improvements, the Project proposes the demolition of three existing warehouse structures and the development of a commercial office building with restaurant and retail maker space uses. The Project would provide approximately 277,700 square feet of office space, 8,000 square feet of restaurant space, and approximately 5,200 square feet of retail

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189 Inert waste is waste which is neither chemically or biologically reactive and will not decompose. Examples include sand and concrete.

190 County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020. The ten Class III landfills serving the County include the Antelope Valley Landfill, Burbank Landfill, Calabasas Landfill, Chiquita Canyon Landfill, Lancaster Landfill, Pebbly Beach Landfill, San Clemente Landfill, Whittier (Savage Canyon) Landfill, Scholl Canyon Landfill, and Sunshine Canyon City/County Landfill. Azusa Land Reclamation is the only permitted Inert Waste Landfill in the County that has a full solid waste facility permit.

191 County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020.

192 County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020, Appendix E-2 Table 4. This total excludes Class III landfills not open to the City of Los Angeles for disposal (i.e., Scholl Canyon, Whittier, Burbank, Pebbly Beach, and San Clemente). In addition, this total excludes the Calabasas Landfill, as its wasteshed does not include the Project Site.

193 As of 2020, according to the Los Angeles County Integrated Waste Management Plan 2020 Annual Report, the Azusa Land Reclamation facility is the only permitted Inert Waste Landfill in the County that has a full solid waste facility permit.

194 County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2020 Annual Report, October 2021.

195 County of Los Angeles, Department of Public Works. Los Angeles County Integrated Waste Management Plan 2020 Annual Report, October 2021.

Table 27
Estimated Project Construction and Demolition Waste Generation and Disposal

Land Use	Size	Generation Rate[a]	Total
Construction Waste (Proposed Uses)			
Office	277,700 sf	3.89 lbs/sf	540 tons
Retail	5,200 sf	3.89 lbs/sf	10 tons
Restaurant/Cafe	8,000 sf	3.89 lbs/sf	16 tons
Demolition Waste (Existing Uses to be Removed)			
Warehousing/Self Storage	40,479 sf	155 lbs/sf	3,137 tons
Total Construction and Demolition Waste			**3,703 tons**
Total Disposal (After 75% Diversion)			**926 tons**

lbs = pound

sf = square feet

[a] *U.S. Environmental Protection Agency, Report No. EPA530-98-010, Characterization of Building-Related Construction and Demolition Debris in the United States, June 1998, Table 4 and Table 6. Generation rates used in this analysis are based on an average of various non-residential building types.*

Source: Eyestone Environmental, 2023.

space. Pursuant to the requirements of SB 1374,[196] the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of its non-hazardous demolition and construction debris. In addition, pursuant to LAMC Sections 66.32 through 66.32.5 (Ordinance No. 181,519), the Project's construction contractor would be required to deliver all remaining construction and demolition waste generated by the Project to a certified construction and demolition waste processing facility. As discussed above, non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste, such as construction waste, yard trimmings, and earth-like waste, is disposed of in inert waste landfills. Thus, although the total diversion rate may ultimately exceed 75 percent, this analysis conservatively assumes a diversion rate of 75 percent.

After accounting for mandatory recycling, as shown in Table 27, the Project would result in approximately 926 tons of construction and demolition waste. This amount of construction and debris waste would represent approximately 0.001 percent of the Azusa Land Reclamation Landfill's remaining disposal capacity of 64.64 million tons.[197] It should be noted that soil export is not included in the calculation of construction waste since soil is not disposed of as waste but, rather, is typically used as a cover material or fill at other construction sites requiring soils import. As reported above, the Azusa Land Reclamation landfill, the County's inert waste landfill, would be able to accommodate waste from the Project's construction activities.

[196] Senate Bill 1374 requires that jurisdictions include in their annual AB 939 report a summary of the progress made in diverting construction and demolition waste. The legislation also required that CalRecycle adopt a model ordinance for diverting 50 to 75 percent of all construction and demolition waste from landfills.

[197] (926 tons ÷ 64.64 million tons) * 100 = 0.001 percent.

Based on the above, Project construction would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals and strategies identified in the ColWMP or by the City (refer to Response to Question No. XIX(e) regarding consistency with City solid waste planning goals). Impacts would be less than significant, and no mitigation measures are required.

Operation

As shown in Table 28 on page 183, based on solid waste generation factors from LASAN, the Project would generate approximately 491 net tons of solid waste per year. The estimated amount of solid waste is conservative because the waste generation factors do not account for recycling or other waste diversion measures. For example, the estimate does not account for AB 939, which requires California cities, counties, and approved regional solid waste management agencies responsible for enacting plans and implementing programs to divert 50 percent of their solid waste away from landfills. The estimate also does not account for compliance with AB 341, which requires California commercial enterprises and public entities that generate four or more cubic yards per week of waste, and multi-family housing with five or more units, to adopt recycling practices. Likewise, the analysis does not include implementation of the City's recycLA franchising system, which is expected to result in a reduction of landfill disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent by the year 2025.

The Project's estimated solid waste disposal of 491 net tons per year represents approximately 0.000003 percent of the remaining capacity (132.58 million tons) at the County's Class III landfills that serve the City.[198] The Project's estimated solid waste generation would therefore represent a nominal percentage of the remaining daily disposal capacity of those landfills. As such, Project operation would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals or strategies identified in the ColWMP or by the City (refer to Response to Question No. XIX(e) regarding consistency with City solid waste planning goals). Impacts would be less than significant, and no mitigation measures are required.

e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): (1) source reduction; (2) recycling and composting; and (3) environmentally safe transformation and land disposal. In addition, AB 1327 provided for the development of the California Solid Waste Reuse and Recycling Access Act of 1991, which requires the adoption of an ordinance by any local agency governing the provision of adequate areas for the collection and loading of recyclable materials in development projects. Furthermore, AB 341, which became effective on July 1, 2012, requires businesses and public entities that generate four cubic yards or more of waste per week and multi-family dwellings with five or more units, to recycle. The purpose of AB 341 is to reduce greenhouse gas emissions by diverting commercial solid waste from

[198] (491 tons per year ÷ 132.58 million tons) * 100 = 0.000003 percent.

Table 28
Estimated Project Operational Solid Waste Generation and Disposal

Building	Size	Employee Generation Rate per sf[a]	Estimated No. of Employees	Solid Waste Generation Rate[b]	Total Generation (tons/year)
Existing Uses					
Warehousing/Self Storage	40,479 sf	0.00033	13 emp	1.87 tn/emp/yr	25
Total Existing					*25*
Proposed Uses (Buildout)					
Office	277,700 sf	0.004	1,111 emp	0.37 tn/emp/yr	411
Retail	5,200 sf	0.002	10 emp	0.91 tn/emp/yr	9
Restaurant/Cafe	8,000 sf	0.004	32 emp	2.98 tn/emp/yr	95
Total Project	*290,900 sf*				*516*
Total Net Increase					**491**

sf = square feet

emp = employee

tn/emp/yr = tons per employee per year

[a] *Project employee generation rates from Los Angeles Departments of Transportation and City Planning, City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020.*

[b] *Solid waste generation rates from LASAN City Waste Characterization and Quantification Study, Table 4, July 2002.*

Source: Eyestone Environmental, 2023.

landfills and expand opportunities for recycling in California. In addition, in March 2006, the Los Angeles City Council adopted RENEW LA, a 20-year plan with the primary goal of shifting from waste disposal to resource recovery within the City, resulting in "zero waste" by 2030. The plan also calls for reductions in the quantity and environmental impacts of residue material disposed in landfills. In October 2014, Governor Jerry Brown signed AB 1826, requiring businesses to recycle their organic waste[199] on and after April 1, 2016, depending on the amount of waste generated per week. Specifically, beginning April 1, 2016, businesses that generate eight cubic yards of organic waste per week were required to arrange for organic waste recycling services. In addition, beginning January 1, 2017, businesses that generate four cubic yards of organic waste per week were required to arrange for organic waste recycling services.

The Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an on-site recycling area or room of specified size.[200] The Project would also comply with AB 939, AB 341, AB 1826, and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. As such, the Project would be in compliance with federal, state, and

[199] Organic waste refers to food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste.

[200] Ordinance No. 171,687, adopted by the Los Angeles City Council on August 6, 1997.

local management and reduction statutes and regulations related to solid waste. Impacts would be less than significant, and no mitigation measures are required.

XX. WILDFIRE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

a. Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

b. Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

c. Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

d. Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. The Project Site is located in an urbanized area within the City of Los Angeles. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone or a City-designated fire buffer zone. Therefore, the Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones and would not result in impacts related to impairing an

adopted emergency response plan or emergency evaluation plan within a wildfire area. No impacts would occur, and no mitigation measures are required.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially 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, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☐	☐	☒	☐
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

a. Does the project have the potential to substantially 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, substantially 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?

Less Than Significant Impact. As discussed above, the Project Site is located in a highly urbanized area and does not serve as habitat for fish or wildlife species. In addition, no sensitive plant or animal community or special status species occur on the Project Site. Since there is the potential that migratory birds could nest in the trees that would be removed under the Project, the Project would further comply with the MBTA regulations by conducting tree or vegetation removal activities outside of the nesting season (February 1–August 31), to the extent feasible, and, if tree or vegetation removal activities occur during the nesting season, the Applicant would retain a biological monitor during the removal activities to ensure that no active nests would be impacted. Therefore, potential impacts associated with migratory birds would be less than significant. In addition, the Project shall incorporate mitigation that is identified under Checklist Question No. V with regard to unanticipated archaeological resources to ensure that potential impacts associated with archaeological resources would be less than significant. Therefore, for the reasons set forth above in this MND, the Project would not have the potential to substantially 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, substantially 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. With the incorporation of the mitigation measure identified above into the Project, all such potential Project impacts would be less than significant.

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.)

Less Than Significant Impact. CEQA requires that the analysis of potential project impacts include cumulative impacts. CEQA defines cumulative impacts as "two or more individual effects which, when considered together are considerable or which compound or increase other environmental impacts."[201] This analysis of cumulative impacts need not be as in-depth as the analysis of the Project's impacts, but instead is to "be guided by the standards of practicality and reasonableness."[202]

As listed in Table 29 on page 187, the City identified 17 related projects within an approximately 0.5-mile radius of the Project Site. A map showing the locations of the related projects relative to the Project Site is included as Figure 9 of the Traffic Assessment included in Appendix IS-12 of this IS/MND. As shown therein, the nearest related projects are Related Project No. 6, an industrial park located at 1005 South Mateo Street approximately 0.3 mile east of the Project Site, and Related Project No. 13, a studio and creative office project located at 2000 East 8th Street, located 0.2 mile south of the Project Site. As the following analysis shows, due to the distance of most of the related projects from the Project Site and the physical conditions in the vicinity of the Project Site, and with the incorporation of the mitigation measures previously identified in this IS/MND, the Project would not have impacts that are individually limited but cumulatively considerable. Therefore, cumulative impacts would be less than significant.

Aesthetics—Pursuant to Senate Bill 743 and ZI No. 2452, the Project is considered an employment center project on an infill site within a transit priority area, and thus in accordance with PRC Section 21099(d)(1), the Project's aesthetic impacts shall not be considered significant impacts on the environment. Given the level of urbanization and transit in the Project vicinity, the majority of related projects would likewise be subject to SB 743 and could not combine with the Project to generate cumulative impacts under CEQA. Any related projects that are not subject to SB 743 would require appropriate analysis of potential impacts and mitigation, as necessary, to reduce such impacts to the extent feasible.

Agriculture and Forestry Resources—As indicated in Checklist Question No. II, Agricultural and Forestry Resources, of this IS/MND, the Project Site is developed with warehouse structures and no agricultural or forest uses exist within the Project Site or its vicinity. Therefore, the Project would not convert agricultural or forestry resources to other uses. In addition, the Project Site and adjacent properties are not designated or zoned for agricultural or forestry use, nor are the Project Site and adjacent parcels subject to Williamson Act contracts. Furthermore, none of the related projects proposes

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[201] State CEQA Guidelines, 14 California Code of Regulations, § 15355, et seq.

[202] Ibid.

Table 29
Related Projects

No.	Project Name and Address	Description	Unit/Area
1.	Mixed-Use 2051 E. 7th St.	Apartments	320 du
		Retail	15,000 sf
		Restaurant	5,000 sf
2.	Mixed-Use 826 S. Mateo St.	Live/Work	90 du
		Retail	11,000 sf
		Restaurant	5,600 sf
3.	Camden Arts Mixed-Use 1525 E. Industrial St.	Live/Work	344 du
		Creative Office Uses	24,774 sf
		Restaurant	4,042 sf
4.	Mixed Use (Revised) 1800 E. 7th St.	Apartments	122 du
		Commercial Uses	9,500 sf
		Amenity Space	5,885 sf
5.	668 S Alameda St Mixed-Use 668 S. Alameda St.	Live/Work	475 du
		Arts and Production Space	15,815 sf
		Grocery Store	15,105 sf
		Commercial/Retail Space	9,943 sf
		Restaurant/Café/Bar	16,140 sf
		Other Supporting Space	4,200 sf
6.	Industrial Park 1005 S. Mateo St.	Industrial Park	94,849 sf
7.	6AM 1206–1338 E. 6th St./ 1205–1321 Wholesale St.	Hotel	412 rooms
		Apartments	1,736 du
		Warehouse	316,632 sf
		Office	253,514 sf
		Restaurant	45,278 sf
		Retail	82,332 sf
		Student Enrollment	300 students
		Art Museum	22,429 sf
8.	2110 Bay Street 2110 Bay St.	Live/Work Apartments	110 du
		Creative Office	113,350 sf
		Shopping Center (retail, health club, market, restaurant)	43,657 sf
9.	670 Mesquit 670 S. Mesquit St.	Hotel	236 rooms
		Apartments	308 du
		Retail	79,240 sf
		Restaurant	89,576 sf
		Event Space	93,617 sf
		Gym	62,148 sf
		Grocery	56,912 sf
		Office	944,055 sf
10.	676 Mateo Mixed-Use 676 S. Mateo St.	Live/Work	172 du
		Commercial Space	23,025 sf

Table 29 (Continued)
Related Projects

No.	Project Name and Address	Description	Unit/Area
11.	Mixed-Use 2143 E. Violet St.	Apartments	347 du
		Restaurant	21,858 sf
		Office	187,374 sf
12.	Rendon Hotel 2053 E. 7th St.	Hotel	103 rooms
13.	Studio 2000 E. 8th St.	Studio with production support, office, and ancillary uses	249,790 sf
14.	Commercial 655 Mesquit St.	Office	184,629 sf
		Retail	4,325 sf
15.	Mixed-Use 930 E. 6th St.	Apartments	236 du
		Commercial	12,000 sf
16.	SPR—Industrial Park 640 S. Santa Fe Ave.	Office	91,185 sf
		Retail	9,430 sf
		Restaurant	6,550 sf
17.	Mixed-Use 1340 E. 6th St.	Apartments	170 du
		Retail	16,518 sf

du = dwelling units

sf = square feet

Related project information provided by the Los Angeles Department of Transportation and Los Angeles Department of City Planning in July 2022 and recent traffic studies prepared in the area. This list includes known development projects within a 0.5-mile (2,460-foot) radius of the Project Site's 0.25-mile (1,320-foot) radius of the farthest outlying study intersections.

Source: Gibson Transportation Consulting, Inc., May 2023.

converting agricultural or forestry resources to other uses. Therefore, the Project would not contribute considerably to cumulative agriculture and forestry resources impacts, and cumulative agriculture and forestry resources impacts would be less than significant.

Air Quality—According to SCAQMD, a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project-specific impacts (i.e., if an individual project exceeds the SCAQMD's recommended daily thresholds for project-specific impacts, then the project would also result in a cumulatively considerable net increase). As indicated in Checklist Question No. III, Air Quality, of this IS/MND, the Project's construction- and operations-related air quality impacts would be less than significant and the Project would be consistent with the AQMD. Therefore, the Project would not contribute considerably to cumulative air quality impacts, and cumulative air quality impacts would be less than significant.

Biological Resources—As provided in response to Checklist Question No. IV, Biological Resources, of this IS/MND, the Project Site is located in a highly urbanized area and does not serve as habitat for fish or wildlife species. In addition, no sensitive plant or animal community or special status species occur on the Project Site and no special-status wildlife or fish species are considered to have a moderate or high potential for occurrence in the Project Site area, the Project would not remove protected trees, and the

Project would not conflict with the provisions of an HCP, Natural Community Conservation Plan or other such plan. Also, since there is the potential that migratory birds could nest in the on-site trees that would be removed under the Project, the Project would further comply with the MBTA regulations to ensure that potential impacts would be less than significant. In addition, as with the Project, the related projects would be required to comply with the City's Protected Tree Ordinance, MBTA regulations, and other applicable biological resources regulations, as well as with CEQA for those projects subject to CEQA review. Furthermore, to the extent that the related projects would result in significant impacts to biological resources, they would be required to implement mitigation to reduce/avoid the impacts. Thus, as the Project would not result in significant impacts to biological resources, the Project would not contribute considerably to cumulative biological resources impacts. As such, cumulative biological resources impacts would be less than significant.

Cultural Resources—Cumulative impacts to historical resources would occur if the Project and related projects affect local resources with the same level or type of designation or evaluation, affect other structures located within the same historic district, or involve resources that are significant within the same context. As provided in Checklist Question No. V, Cultural Resources, of this IS/MND, the SCCIC records search conducted for the Project indicates that no known historic resources or HCMs are located within the Project Site. In addition, none of the Project Site buildings has been identified as potential historic resources on SurveyLA, the Citywide historic resources survey performed by the City's Office of Historic Resources. While there are no historical resources on the Project Site, as discussed in the Historical Resources Technical Report include as Appendix IS-3 of this IS/MND, the Pioneer Truck & Transfer Building, was identified as a historical resource, and is located to the northeast of the Project Site at 1910 Bay Street, was identified by SurveyLA as individually eligible for listing in the NRHP and the CRHR and for local designation as an excellent intact example of a 1920s warehouse building in Los Angeles' primary industrial district. As detailed in Checklist Question No. V, the significance of the Pioneer Truck & Transfer Building would not be impaired by the Project. In addition, other potential development projects would be subject to the same CEQA requirements as the Project and potential impacts to historic resources would be evaluated as part of those projects' environmental analysis. The determinations regarding impacts to historical resources from other development projects would be made on a case-by-case basis and the impacts of cumulative development on historical resources would be mitigated to the extent feasible. As such, cumulative historical resources impacts would be less than significant.

For archaeological resources, all related projects are subject to applicable regulations formulated to avoid significant archaeological resource impacts. In addition, as applicable, related projects would include CEQA mitigation and/or the City's standard COA for archaeological resources. Therefore, through adherence to applicable regulations, the Project and related projects would not result in significant cumulative impacts on archaeological resources.

With regard to impacts related to human remains, if human remains were discovered during construction of any related projects, work in the immediate vicinity would be halted, the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code section 7050.5, and disposition of the human remains and any associated grave goods would occur in accordance with PRC Section 5097.91 and 5097.98, as amended. Therefore, with the implementation of regulatory requirements, cumulative impacts related to human remains would be less than significant

Energy—As analyzed under Checklist Question No. VI, Energy, of this IS/MND, the Project would result in a less-than-significant impact on energy resources and would adhere to all applicable energy

conservation requirements (e.g., City's Green Building Ordinance, Title 24 energy efficiency standards, etc.), and would implement sustainability features which include, Project has been designed and would be constructed to incorporate environmentally sustainable building features equivalent to Platinum certification under the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED®) Rating System for new construction, and environmentally sustainable building features and construction standards required by the Los Angeles Green Building Code and CALGreen. In addition, the Project also aims to be one of the first Net Zero Carbon office building in the City for both operational and embodied carbon. As with the Project, the related projects would also be expected to implement energy conservation features to minimize the inefficient use of energy in accordance with applicable regulations, including the City's Green Building Ordinance and Title 24 energy efficiency standards. Therefore, the Project and the related projects would not result in the wasteful, inefficient, or unnecessary consumption of energy resources or conflict with or obstruct a state or local plan for renewable energy or energy efficiency. As such, the Project would not contribute considerably to cumulative energy impacts, cumulative energy impacts would be less than significant.

Geology and Soils—Due to their site-specific nature, geology and soils impacts are typically assessed on a project-by-project basis or for a particular localized area. As analyzed under Checklist Question No. VII, Geology and Soils, of this IS/MND, the Project's impacts would be less than significant. As with the Project, the related projects would address site-specific geologic hazards through the implementation of site-specific geotechnical recommendations and/or mitigation measures. Cumulative development would expose a greater number of people to seismic hazards. However, as with the Project, the related projects would be subject to local, state, and federal regulations and standards for seismic safety. As the Project Site has previously been graded and developed, surficial paleontological resources that may have existed at one time have likely previously been disturbed. Based on a Project Site-specific paleontological records search conducted through the Natural History Museum of Los Angeles County, there are no previously encountered fossil localities located within the Project Site. However, the possibility exists that paleontological artifacts that were not discovered during prior construction or other human activity may be present within the Project Site. As such, the Project would implement Mitigation Measures GEO-MM-1 and GEO-MM-2 to address inadvertent discovery of paleontological resources and would not directly or indirectly destroy a unique paleontological resource. As part of the environmental review processes for the related projects, it is expected that mitigation measures or City conditions of approval would be required to address the potential for uncovering of paleontological resources. Therefore, the Project would not contribute considerably to cumulative geology and soils impacts, and cumulative geology and soils impacts would be less than significant.

Greenhouse Gas Emissions—As discussed above under Checklist Question No. VIII, Greenhouse Gas Emissions, of this IS/MND, the analysis of a project's GHG emissions is inherently a cumulative impacts analysis because climate change is a global problem and the emissions from any single project alone would be negligible. Accordingly, the Project-level analysis under Checklist Question No. VIII, Greenhouse Gas Emissions, of this IS/MND assessed the potential for the Project to contribute to the cumulative impact of global climate change. As analyzed above, the Project's impacts regarding GHG emissions would be less than significant. As such, the Project would not contribute considerably to cumulative GHG impacts, and cumulative GHG impacts would be less than significant.

Hazards and Hazardous Materials—As with the Project, all related development located within the vicinity of the Project Site would be subject to local, regional, state, and federal regulations pertaining to hazards and hazardous materials. Furthermore, the nearest related projects are located 0.3 mile from the

Project Site and therefore it is not anticipated that any hazards and hazardous materials impacts associated with the related projects would combine with such impacts of the proposed project to result in cumulative hazards and hazardous materials impacts. Lastly, as discussed in Checklist Question No. IX, Hazards and Hazardous Materials, of this IS/MND, with the incorporation of Mitigation Measure HAZ-MM-1 the Project's potential impacts related to hazards and hazardous materials would be less than significant. Hence, the Project would not contribute considerably to cumulative hazards and hazardous materials impacts, and cumulative hazards and hazardous materials impacts would be less than significant.

Hydrology and Water Quality—With regard to hydrology and water quality, related projects could potentially result in an increase in surface water runoff and contribute point and non-point source pollutants to nearby water bodies. However, as with the Project, related projects would be subject to the City's LID requirements. In addition, construction projects greater than one acre would be subject to NPDES permit requirements, including development of a Stormwater Pollution Prevention Plan, Standard Urban Stormwater Mitigation Plan requirements during operation, and other local requirements pertaining to hydrology and surface water quality, while smaller construction projects would be subject to local erosion control regulations, including the requirement to prepare a Local SWPPP. It is anticipated that related projects would also be evaluated on an individual basis by the City of Los Angeles Department of Public Works to determine appropriate BMPs and treatment measures to avoid significant impacts to hydrology and surface water quality. The Project would also improve runoff conditions compared to existing conditions. Thus, with implementation of standard regulatory requirements, Project impacts related to hydrology and water quality would not be cumulatively considerable and, cumulative impacts would be less than significant.

Land Use and Planning—As discussed in Checklist Question No. XI, Land Use and Planning, of this IS/MND, the Project would be substantially consistent with applicable land use plans, policies and regulations (e.g., the General Plan Framework Element, Central City North Community Plan, Downtown Los Angeles Community Plan, LAMC, River Implementation Overlay District, and SCAG's 2020–2045 RTP/SCS), and would result in less than significant land use and planning impacts. Specifically, the Project would not physically divide an established community, and would not cause a significant environmental impact due to a conflict with a land use plan, policy or regulation adopted for the propose of avoiding or mitigating an environmental effect. As with the Project, the related projects would be reviewed on a case-by-case basis to ensure consistency with existing land use policies and regulations. Where inconsistencies occur for the related projects, it is anticipated that appropriate actions would be undertaken to ensure that land use impacts would be less than significant. Thus, cumulative land use impacts would be less than significant.

Mineral Resources—As discussed in Checklist Question No. XII, Mineral Resources, of this IS/MND, the Project Site is not located within a City-designated Mineral Resource Zone or a mineral producing area as classified by the California Geological Survey such that the Project would not result in the loss of a locally-important mineral resource recovery site. Furthermore, no mineral resources or extraction operations for such resources occur in the Project Site vicinity. Therefore, the Project would not contribute considerably to cumulative mineral resources impacts, and cumulative mineral resources impacts would be less than significant.

Noise—As detailed in Checklist Question No. XIII, Noise, of this IS/MND, potential noise impacts associated with the Project construction and operation would be less than significant. The Project's

potential vibration impacts with respect to human annoyance and potential building damage associated with construction activities and operation would also be less than significant. In addition, Project's potential groundborne noise impacts would be less than significant during construction and operation. Also, the closest related projects are located approximately 0.3 mile from the Project Site such that Project construction and operations-related stationary source and activity-related noise would not combine with noise from the related projects to result in cumulative noise. Lastly, like the Project, the related projects would be required to mitigate their noise impacts. Therefore, the Project would not contribute considerably to cumulative noise impacts, and cumulative noise impacts would be less than significant.

Population and Housing—As discussed in Section 2, Project Description, of this IS/MND, the Project Site is currently developed with three warehouse buildings and surface parking areas. As discussed in Checklist Question No, XIV, Population and Housing, of this IS/MND, the Project would not construct or displace residential units such that there would be no direct impacts to population and housing. While the Project would increase on-site employment, these increases would not be expected to cause a substantial number of new households to move to the Central City North Community Plan area or to generate a demand for substantial new housing. Further, the Project Site is already developed with urban uses, and the Project would not extend infrastructure to currently unserved areas and would not induce substantial population growth. Thus, as concluded in Checklist Question No. XIV, Project population and housing impacts would be less than significant. In addition, while the related projects could cumulatively increase population in the area, such increases would be expected to be within City and SCAG growth forecasts. The Project would contribute little if any to additional population growth in the area. Thus, the Project would not contribute considerably to cumulative population and housing impacts, and cumulative population and housing impacts would be less than significant.

Public Services—As discussed in Checklist Question No. XV, Public Services, of this IS/MND, the Project would meet City fire flow and emergency access requirements and City Building Code requirements related to fire protection with the implementation of Project Design Feature WAT-PDF-1. The Project would implement a Construction Management Plan pursuant to Project Design Feature TR-PDF-1 to ensure adequate emergency access during construction. In addition, the Project would not result in a substantial increase in demand for LAFD facilities and services and would not result in substantial traffic congestion which could slow emergency response. Therefore, Project impacts to fire protection would be less than significant. Like the Project, the related projects would be required to comply with applicable City fire protection requirements, fire/life safety plan review, and in some instances implement a Construction Management Plan. In addition, the Project would implement a fire lane with through access to Wilson Street. Furthermore, consistent with the decision in *City of Hayward v. Board Trustees of California State University* (2015) 242 Cal.App.4th 833 and the requirements stated in the California Constitution Article XIII, Section 35(a)(2), it is the City's obligation to provide adequate fire protection and emergency medical services. Through the City's regular budgeting efforts, LAFD's resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time. Therefore, the Project would not contribute considerably to cumulative fire protection impacts, and cumulative fire protection impacts would be less than significant.

Regarding police protection, as discussed in Checklist Question No. XV the Project would not introduce a direct residential population typically associated with an increased demand for such services. In addition, the Project Site would include security features including security fencing, lighting, and locked entry. In addition, the Project would include a closed circuit camera system and keycard entry. Furthermore,

consistent with the decision in *City of Hayward v. Board Trustees of California State University* (2015) 242 Cal.App.4th 833 and the requirements stated in the California Constitution Article XIII, Section 35(a)(2), it is the City's obligation to provide adequate police services. LAPD would continue to monitor population growth and land development in the City and identify additional resource needs including staffing, equipment, basic cars, other special apparatuses, and possibly station expansions or new station construction that may become necessary to achieve the required level of service. Through the City's regular budgeting efforts, LAPD's resource needs would be identified and allocated according to the priorities at the time. The Project would not contribute considerably to any cumulative police protection impacts, and cumulative police protection impacts would be less than significant.

As analyzed previously, the Project would not generate a direct residential population that could increase the demand for schools or libraries. In addition, any indirect increase in the local residential population associated with the Project would be inconsequential. Lastly, like the Project, the related projects would be required to pay SB 50 school impact fees which, pursuant to Government Code Section 65995, is considered full mitigation for the impact of new development on schools. Therefore, the Project would not contribute considerably to any cumulative impacts to schools or libraries, and cumulative schools and libraries impacts would be less than significant.

Parks and Recreation—The Project does not include residential development, which typically creates a direct demand on park services. In addition, any indirect increase in the local residential population associated with the Project would be inconsequential. Furthermore, the Project proposes Project would include approximately 41,500 square feet of outdoor areas throughout the Project Site.[203] Specifically, the Project would include 25,500 square feet of exterior (uncovered) office space, 2,100 square feet of outdoor dining, 10,900 square feet of outdoor amenity deck (Level 7), and 3,000 square feet of rooftop deck (Level 15). Thus, as discussed in Checklist Question No. XVI, Recreation, of this IS/MND, the Project would meet its on-site demand for park and recreational facilities, and no substantial new demand for parks and recreational facilities would occur. Moreover, those related projects requiring discretionary approvals would be subject to CEQA review by the City which would address, in part, parks and recreational facilities service demand, and the related projects. Furthermore, the related Projects would be required to comply with the parks and recreation requirements of the Quimby Act and LAMC (e.g., provision of parkland and/or payment of in-lieu fees), as applicable. Thus, the Project would not contribute considerably to cumulative parks and recreation impacts, and cumulative parks and recreation impacts would be less than significant.

Transportation—Similar to the Project, the related projects considered in the transportation assessment would be individually responsible for complying with relevant plans, programs, ordinances, or policies addressing the circulation system. In addition, similar to the Project, the related projects would be required to mitigate any conflicts with VMT reduction requirements, substantial hazards due to geometric design features or incompatible uses, and inadequate emergency access. Furthermore, as discussed in Checklist Question No. XVII, Transportation, and in the Transportation Assessment (Appendix IS-10 of this IS/MND), the Project would be consistent with existing applicable plans addressing circulation and would result in less-than-significant impacts associated with VMT, hazards due to design features or incompatible uses, and emergency access. Related projects would undergo screening and analyses in

[203] Uncovered outdoor areas do not contribute to the Project's FAR. This includes all open to the sky terraces, balconies, and 5-foot covered balconies.

accordance with LADOT TAG and be required to implement TDM features or mitigation measures as needed. Therefore, the Project would not contribute considerably to cumulative transportation impacts, and cumulative transportation impacts would be less than significant.

Tribal Cultural Resources—As discussed in Checklist Question No. XVIII, Tribal Cultural Resources, of this IS/MND, the majority of the related projects are located a substantial distance from the Project Site. In addition, the Project and several of the related projects are located on sites that are currently developed or have otherwise been disturbed. Furthermore, the TCR Report and SCCIC records search conducted for the Project indicates that impacts related to tribal cultural resources would be less than significant. Notwithstanding, given the past history of Native American occupation in the Los Angeles area and greater southern California region, and in light of the general proximity of the Project site to known villages, roads, and the Los Angeles River, as well as the input from the tribal representatives, it is concluded that Project construction activities could potentially unearth or otherwise disturb buried tribal cultural resources. As such, out of an abundance of caution to provide maximum protection against inadvertent encounters with previously unidentified tribal cultural resource, the Project shall incorporate the mitigation identified in Checklist Question No. XVIII, Tribal Cultural Resources, of this IS/MND, which will ensure that the Project's potential impacts associated with unanticipated tribal cultural resources would be less than significant. Any related projects would similarly be subject to any mitigation measures should it be determined that there may be tribal cultural resources present. Furthermore, like the Project, the related projects would be required to comply with the consultation requirements of AB 52 to determine and mitigate any potential impacts to tribal cultural resources. Therefore, cumulative impacts associated with tribal cultural resources would be less than significant.

Utilities and Service Systems—Due to shared urban infrastructure, the Project and related projects would cumulatively increase water demand, wastewater generation, stormwater discharges, and energy and telecommunication service demand on the local water, sewer, stormwater drainage, and energy infrastructure. However, as discussed in Checklist Question No. XIX, sufficient infrastructure capacity is available to accommodate the Project. In addition, like the Project, related projects would be reviewed by the City to ensure that sufficient capacity exists or additional improvements are made to provide capacity prior to construction. Therefore, the Project would not contribute considerably to cumulative utilities and service system impacts, and cumulative impacts would be less than significant.

With regard to solid waste, the Project in conjunction with related projects would increase the need for solid waste disposal during their respective construction periods. However, as discussed in Checklist Question No. XIX, unclassified landfills in the County do not generally have capacity concerns, and inert landfills serving the Project and the related projects would have sufficient capacity to accommodate construction waste disposal needs. With regards to operational solid waste disposal needs, the minimal increase in solid waste generated by the Project would be well within the capacity of existing landfills, as discussed in Checklist Question No. XIX of this IS/MND. In addition, with the implementation of solid waste policies and objectives intended to help achieve the requirements of AB 939 and the City's 90-percent diversion goal, it is expected that the Project and related projects would not substantially reduce the projected timeline for landfills within the region to reach capacity. Furthermore, the County of Los Angeles conducts ongoing evaluations to ensure that landfill capacity is adequate to serve the forecasted disposal needs of the region. Therefore, the Project would not contribute considerably to cumulative solid waste impacts, and cumulative solid waste impacts would be less than significant.

Wildfire—As discussed in Checklist Question No. XX, Wildfire, of this IS/MND, the Project would not substantially impair an adopted emergency response plan or emergency evacuation plan or expose people or structures to significant risks, including downslope or downstream flooding or landslides, after a fire, because the Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. Thus, the Project would not contribute considerably to cumulative wildfire impacts, and cumulative wildfire impacts would be less than significant.

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

Less Than Significant Impact. Based on the analyses presented in this IS/MND, with the incorporation of the mitigation measures identified in this IS/MND, the Project's environmental impacts would be less than significant. Therefore, the Project would not have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly, and the impacts would be less than significant.