DEPARTMENT OF CITY PLANNING

RECOMMENDATION REPORT

Central Los Angeles Area Planning Commission
Date: May 14, 2019
Time: 4:30 P.M.
Place: City Hall, Room 1070

Public Hearing: Waived
Appeal Status: Applicant or other aggrieved person may appeal to City Council within 15 days of the mailing date of the APC decision.
Expiration Date: June 4, 2019
Multiple Approval: No

Case No.: APCC-2019-1653-SPE
CEQA No.: ENV-2017-2422-EIR
Incidental Cases: N/A
Related Cases: APCC-2017-2421-SPE-SPP
CPC-1993-442-SP
Council No.: 14—Huizar
Plan Area: Central City North
Specific Plan: Alameda District
Certified NC: Los Angeles Historic Cultural
GPLU: Regional Center Commercial
Zone: ADP-RIO

Applicant: Coresite Real Estate (Brian Warren)
Representative: Armbruster Goldsmith & Delvac LLP (Matt Dzurec)

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

PROPOSED PROJECT: Construction of a 94-foot-high data center building containing up to 179,900 square feet of floor area and 113 surface parking spaces.

REQUESTED ACTION:

1. Pursuant to CEQA Guidelines Sections 15162 and 15164, in consideration of the whole of the administrative record, the project was assessed in the previously certified Environmental Impact Report for Case No. CPC-1993-442-SP, State Clearinghouse No. 1994031006, certified on June 18, 1996, and supported by the addendum dated July 5, 2018; no major revisions are required to the EIR and no subsequent EIR is required for approval of the project;
2. Pursuant to Los Angeles Municipal Code Section 11.5.7.F, Exception from Section 11.E of the Alameda District Specific Plan to permit reduced parking for the existing and proposed data center buildings.

RECOMMENDED ACTIONS:

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

VINCENT P. BERTONI, AICP
Director of Planning

Heather Bleemers, Senior City Planner

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Telephone: (213) 847-3688

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PROJECT ANALYSIS

BACKGROUND

Previously Approved Original Project

The original version of the CoreSite LA3 data center project was approved by the Central Area Planning Commission (Central APC) on October 9, 2018. The Project Site is at 900 North Alameda Street, adjacent to and on the same property as the existing CoreSite LA2 data center in the old Post Office Terminal Annex building. The approval was for the construction of a 94-foot-high data center building with 179,900 square feet of floor area and a 50-foot-high parking structure. The parking structure would have 124 parking spaces and there would be 84 surface parking spaces, for a total of 208 parking spaces serving both the new data center building and the existing Terminal Annex building, which has both data center and post office uses.

The entitlements for this original case were a Project Permit Compliance for the data center itself, and a Specific Plan Exception for the reduced parking. The Alameda District Specific Plan (ADSP) would have required 474 total spaces for the proposed and existing uses on site, as all non-residential uses are treated alike by the Specific Plan. The rationale behind the Specific Plan Exception was that a data center uses significantly less parking than would otherwise be required. As part of the CEQA analysis, Gibson Transportation prepared a study (Gibson Study) showing that peak parking demand for all uses on the site would be 105 spaces. Accordingly, the original project included a request, which was granted, to use the LAMC parking generation factor for a warehouse for the data center uses, reasoning that a data center was like a warehouse for computers and telecommunications equipment. Along with the Specific Plan rate for the Post Office, this resulted in a total required parking for the site of 185 spaces. Also, the existing CoreSite LA2 facility was approved in 2002 using a similar Specific Plan Exception to treat data center uses as a warehouse for parking purposes.

Proposed Revised Project

More recently, in post-entitlement review, the Los Angeles Department of Water and Power (LADWP) has tentatively modified its requirements to require an electrical substation to be built on the project site that would occupy space that had been planned for the parking structure. Therefore, this revised project is seeking to eliminate the parking structure from the project and instead be required only to provide the 105 parking spaces that the Gibson Study showed would be necessary to satisfy demand; the current proposal is a design that would have 8 surplus spaces beyond that for 113 total spaces. Thus, the current entitlement proposal does not modify the approved Project Permit Compliance for the data center but does propose, as its sole entitlement request, a new Specific Plan Exception to further reduce the parking requirement to 105 spaces.

The existing parking spaces as well as the analyzed, approved, and proposed parking spaces are summarized in the following table:

Existing Spaces	2018 Project				2019 Revision	
	ADSP Required Spaces	Gibson Study Space Demand	LAMC Warehouse Rate Spaces	Approved Spaces	Proposed Required Spaces	Proposed Plan Spaces
276	474	105	185	208	105	113

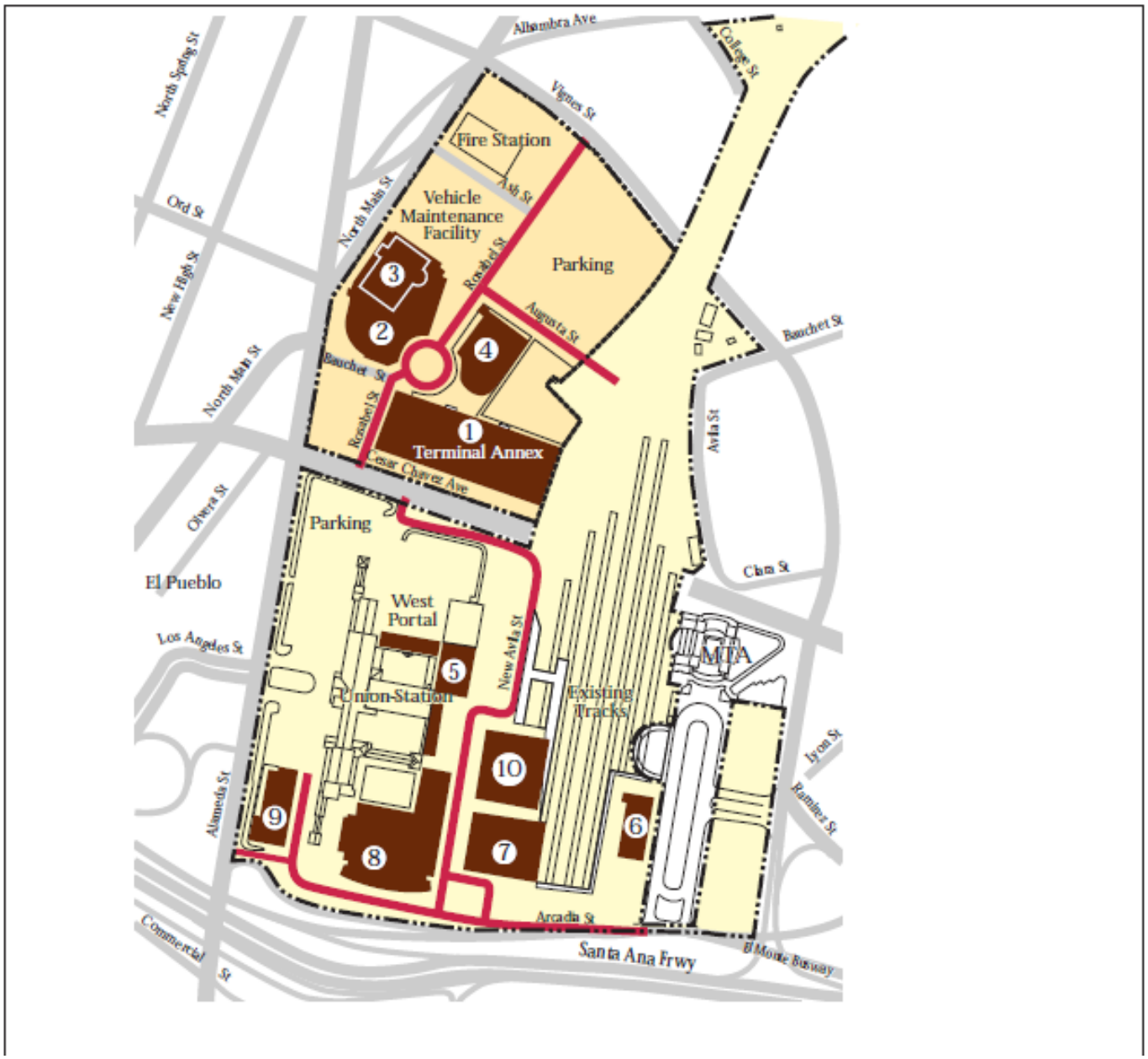
Existing Zoning and Land Use Regulations

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

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

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

Alameda District Specific Plan, Phase I Analyzed Projects:



Adjacent Streets

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

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

Bauchet Street is a street as that extends to the east of Alameda Street, adjacent to the Project Site, then turns north near where the new building is proposed, ending in a cul-de-sac. It is

undesignated but is constructed to a roadway width of between 35 and 48 feet, improved with sidewalks, curbs, and gutters.

Relevant Related Cases

On-Site:

Case No. APCC-2017-2421-SPE-SPP: On October 9, 2018, the Central Area Planning Commission approved a Project Permit Compliance for the construction of the CoreSite LA3 Data Center and a Specific Plan Exception to allow reduced parking (208 spaces). This is detailed under "Project Background: Previously Approved Original Project" and is the original version of the project being proposed under the current entitlement request, which does not modify the Project Permit Compliance, but does request another Specific Plan Exception to reduce parking further.

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

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

- Telecommunication Uses required parking per Los Angeles Municipal Code ("LAMC") Section 12.21.A.4.C.1 (Warehouse Use) which requires one parking space per 500 square feet of floor area for the first 10,000 square feet and one parking space per 5,000 square feet for the remaining floor area over the first 10,000 square feet.

- Office and retail (post office uses) required parking of 1.1 spaces per 1,000 square feet of floor area in compliance with the ADSP.

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

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

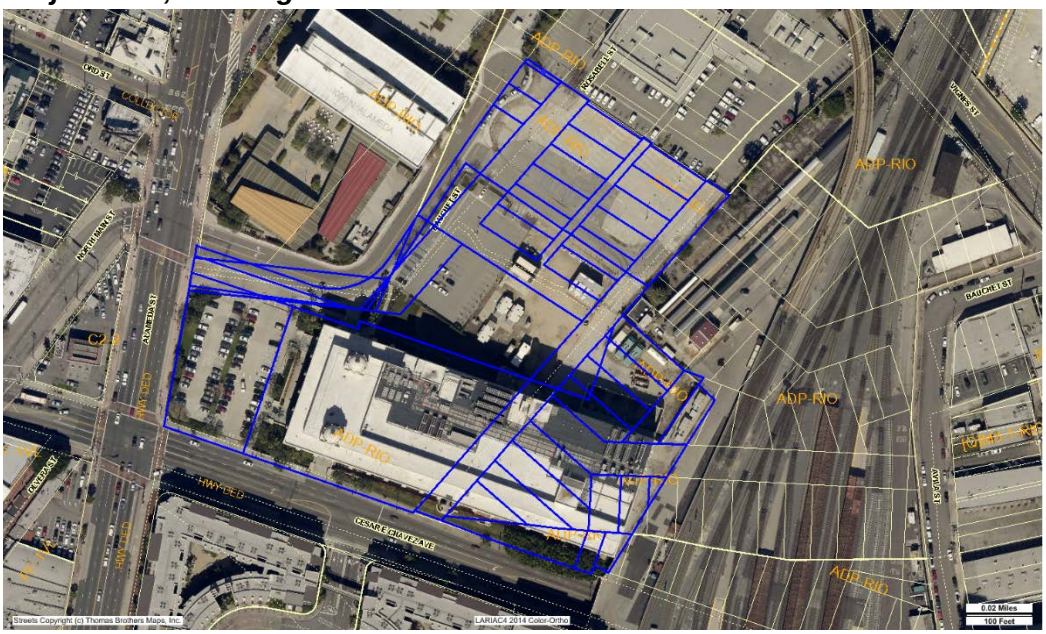
There are no relevant off-site cases.

PROJECT SUMMARY

Project Location and Existing Uses

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

Project Site, Existing Aerial Photo and Parcels:



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

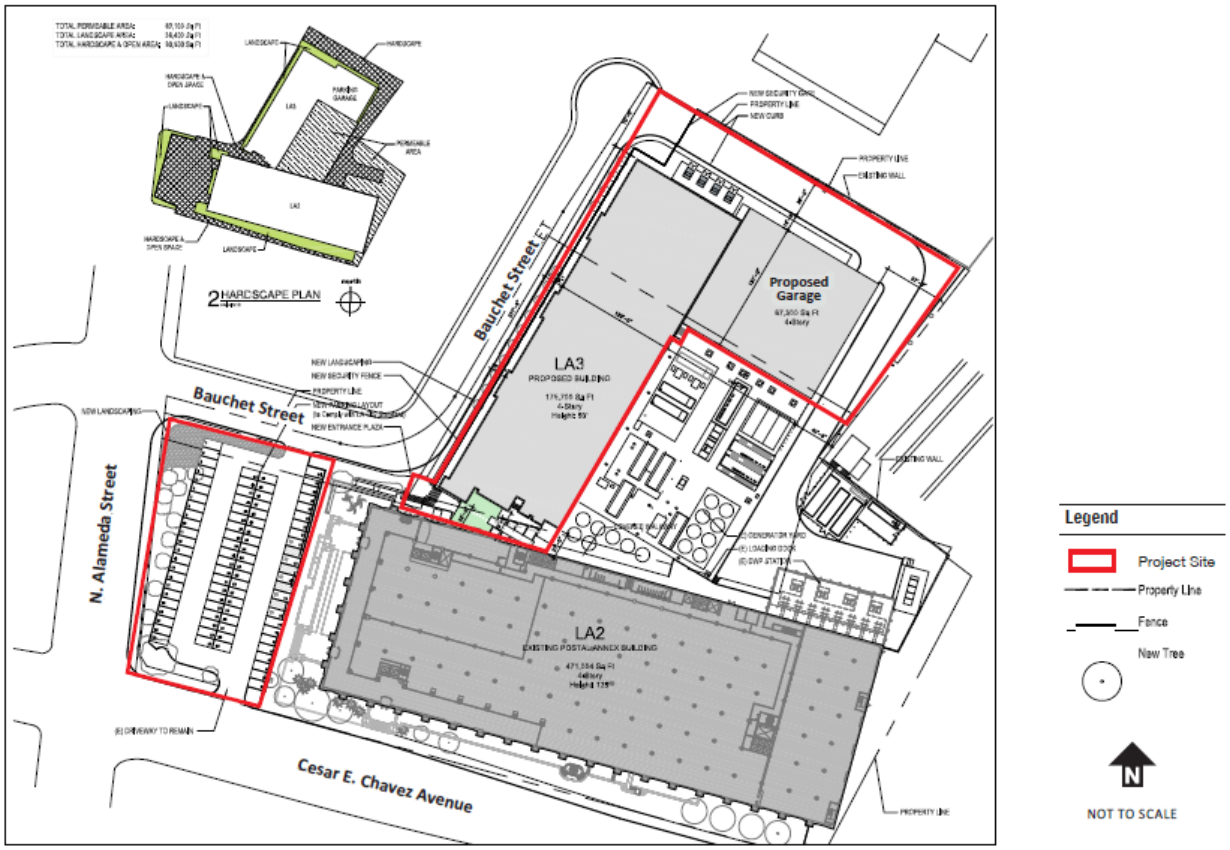
Access to the building and parking would be provided from Alameda Street via Bauchet Street and along a private roadway that runs through the site. Existing landscaping includes ten small- to medium-sized deciduous trees that line Bauchet Street, a small, triangular landscaped space on the northern side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

Project Description

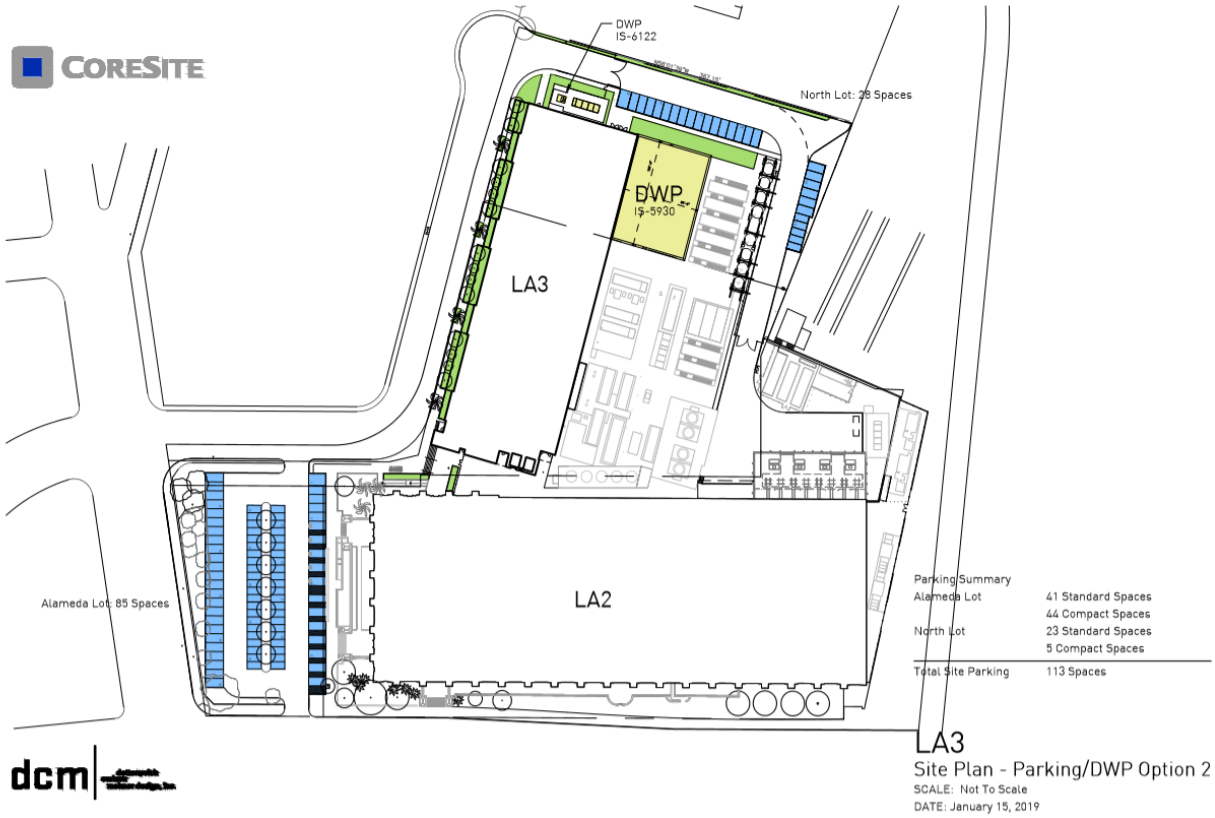
The Applicant proposes to demolish some of the existing surface parking located north of the Terminal Annex building and would construct a new data storage building with approximately 179,900 square feet of floor area within a four-story, 94-feet-in-height building. The new data center building would house computer servers and supporting equipment for private clients. Data centers are almost exclusively occupied by telecommunications switching and computer equipment and typically have very few employees present at the site at any one time. Those few employees who are present are there primarily for operating, maintaining, and servicing the equipment. In some cases, the spaces will also include some office space for marketing and sales personnel. There are typically no guest visitors to data centers.

As noted under “Proposed Revised Project,” the previously approved Original Project included a 50-foot-high parking structure located to the east of the approved new data center building, and the current proposal for a Revised Project eliminates this parking structure and instead locates an LADWP electrical substation east of the approved new data center building, relying on surface parking rather than structured parking. On the following page are shown the site plans for both the Original Project and the Revised Project.

Previously Approved Original Project Plan:



Proposed Revised Project Plan:



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

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

Vehicle Parking, Transit, and Pedestrian Access

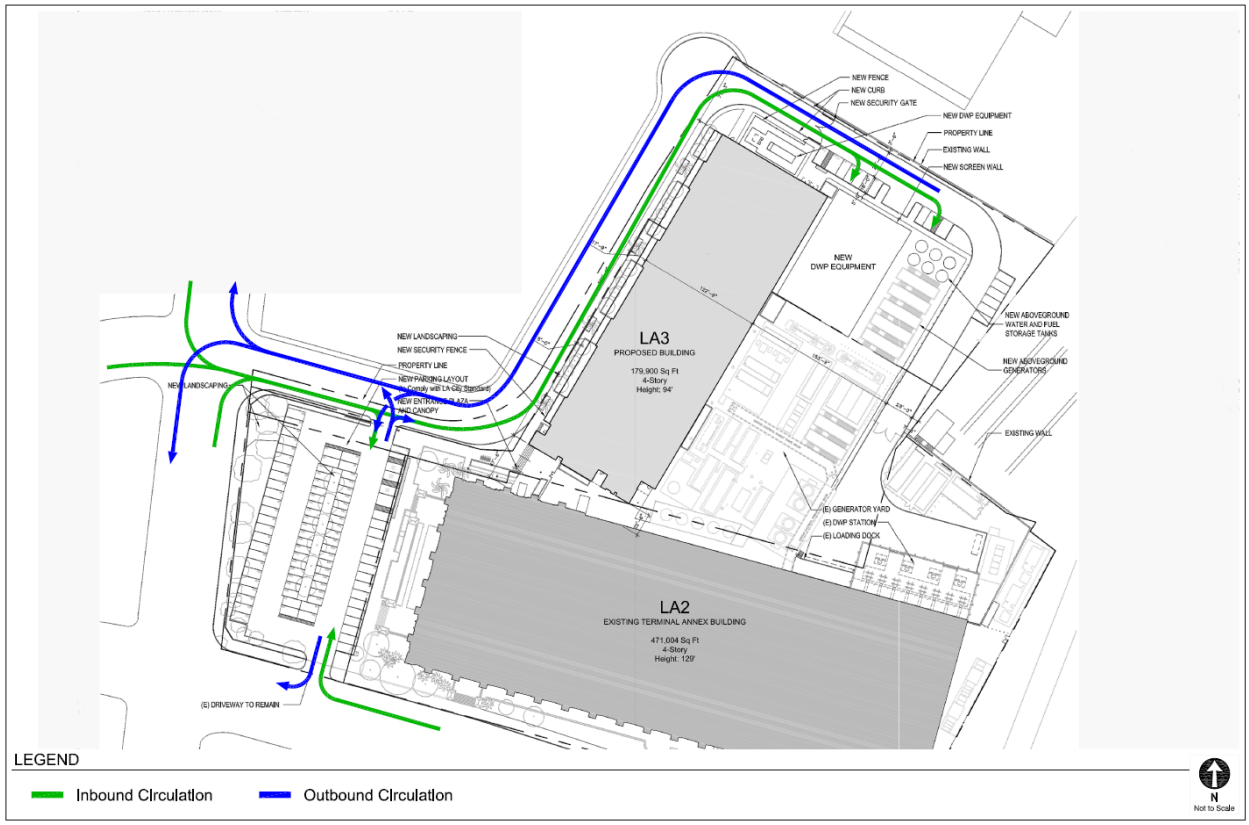
The Original Project also included construction of a four-story, 50-foot-high parking structure adjacent to the east end of the new building which would have contained 124 parking spaces. The Revised Project now under consideration eliminates that parking structure and instead places an LADWP electrical substation in its approximate location. Additional project improvements include reconfiguration of the surface parking lot to the west of the Terminal Annex building to contain 85 parking spaces and improvements with new landscaping, new lighting, a new driveway along the northern edge of the site, 28 additional parking spaces along the north and northeast perimeter of the project site, and the addition of generators and electrical switchgear in the existing equipment yard.

A total of 113 parking spaces are proposed to serve the new data center building and the Terminal Annex building uses. Given that the parking demand for the data center uses are substantially lower than the required parking set forth in the Alameda District Specific Plan of 1.1 space per 1,000 square feet, the Applicant is requesting an exception to permit parking for the data center uses to be based on the Gibson Study, which calculated the peak demand for parking on the project site to be 105 spaces. The Gibson Study based this analysis on the peak demand for the existing Coresite LA2 data center in the Terminal Annex building, the retail post office use in the Terminal Annex building, and the approved new Coresite LA3 data center building. The current proposal requests a Specific Plan Exception to reduce the required parking to 105 spaces, but includes a site plan that includes an excess of 8 spaces beyond that for a total of 113 spaces. The Gibson Study was reviewed by Wes Pringle of Los Angeles Department of Transportation (DOT), and in an email dated March 21, 2019, Pringle wrote that *"DOT concurs with the results of the analysis that the site will provide enough spaces for the peak parking demand of the project."*

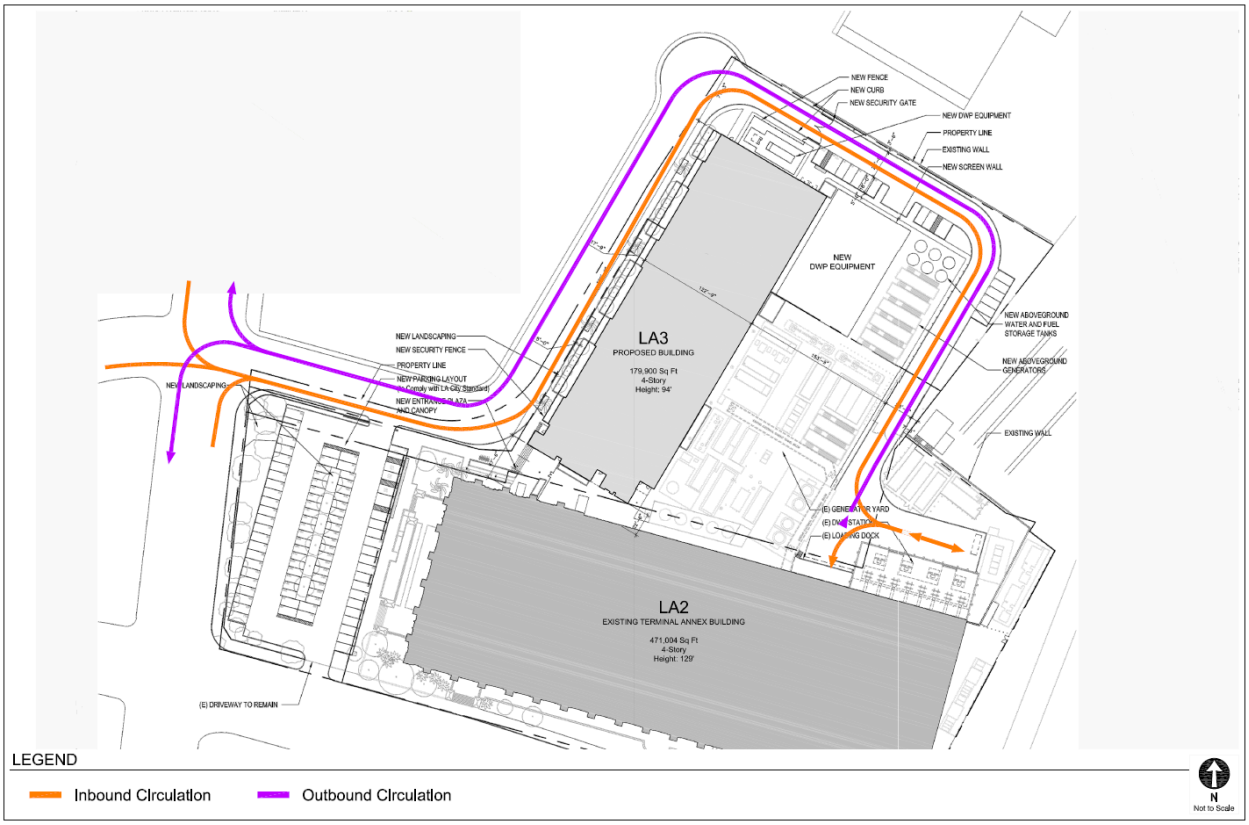
To construct the new data center building and electrical substation, existing surface parking would be removed. Additionally, the existing parking lot west of the Terminal Annex building would be expanded. The parking lot currently has a total of 63 parking spaces, including four ADA spaces. The parking lot would be expanded to the north, paving over an undeveloped area between the existing parking lot and Bauchet Street, thereby increasing the number of parking spaces to 85. Existing site access would remain from Cesar Chavez Avenue and Bauchet Street, which have entrances to the parking lot west of the Terminal Annex building. This shared parking lot would provide access to both data centers and the post office.

Access to the proposed surface parking along the northern and northeastern perimeter of the site would be provided from Bauchet Street via a new curb cut and driveway near the north end of the site. The driveway would also maintain access to the LADWP substation and the eastern area of the equipment yard and loading dock. The driveway would also provide service vehicles and fire trucks access to the site. See the following figures for access diagrams for passenger vehicles and trucks.

Proposed Revised Project Passenger Vehicle Access:



Proposed Revised Project Truck Access:



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

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

Surrounding Uses

As noted, the four-story California Endowment office and conference center is located adjacent to the Project Site on the northwest side of Bauchet Street. North of the Project is the Post Office Alameda Carrier Annex facility that is accessed from Vignes Street. South of the Project Site on the south side of Cesar Chavez Avenue is the 52.3-acre Union Station property. At the eastern end of the Union Station property is Gateway Center, which contains the Los Angeles County Metropolitan Transportation Authority's (LACMTA) 26-story headquarters Building, and central maintenance and bus Layover facilities. Further to the south is the Santa Ana Freeway (US-101).

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

Environmental Clearance

An Addendum dated July 5, 2018, to the Environmental Impact Report (EIR) for the Alameda District Specific Plan, certified on June 18, 1996, was prepared for the data center project which analyzes and discloses the environmental effects that might reasonably result from the proposed changes to development under the Specific Plan approved in 1996. At the time that the EIR was prepared, there was no separate Environmental case number assigned to an EIR. As such, the original EIR is identified as being associated with Case No. CPC-1993-442-SP, State Clearinghouse No. 1994031006.

The Addendum to the EIR, dated July 5, 2018, was assessed by the Central Area Planning Commission when it approved the Original Project on October 9, 2018. In doing so, the Central APC determined that substantial changes resulting in new significant effects or a substantial increase in the severity of previously identified significant effects in the Specific Plan EIR would not occur with the data center project, substantial changes with respect to the circumstances under which the project is undertaken resulting in new significant effects or a substantial increase in the severity of previously identified significant effects in the Specific Plan EIR would not occur, and new information of substantial importance with respect to this environmental resource resulting in new significant effects or a substantial increase in the severity of previously identified effects in the Specific Plan EIR has not been identified. Therefore, a supplemental EIR was not required under CEQA.

As demonstrated in the Addendum, the project would not substantially increase the severity of the previously identified impacts in the Specific Plan EIR, and no new significant impacts would occur with implementation of the data center project. The applicable mitigation measures in the EIR would be required to be implemented by the data center project and no new additional mitigation measures are necessary. Importantly, the Addendum to the EIR included a consideration of the Gibson Study and did not find that any new significant environmental impacts would occur as a result of reducing the parking space allotment to as low as 105 spaces, which would satisfy peak demand.

ENTITLEMENT ANALYSIS

Specific Plan Exception for Parking

The project includes the construction of an already approved new 179,900-square-foot data center building that would house computer servers and supporting equipment for private clients. The new building, known as Coresite LA3, would complement the existing use of the Terminal Annex building located on the site which is also owned and operated by the Applicant and predominately used for data storage except for a small 12,000 square-foot retail Post Office. The project proposes to provide 113 surface parking spaces, with 85 spaces provided in a reconfigured surface lot west of the existing Terminal Annex building, and 28 spaces provided along the north and northeast perimeter of the project site, near the new data center building. These spaces would provide parking for both the proposed new data center building and the uses in the Terminal Annex building (also known as Coresite LA2).

Section 11.E.4 of the Specific Plan requires 1.1 parking spaces per 1,000 square feet for all non-residential uses, which would require 198 parking spaces for the new building. The existing Terminal Annex building requires 276 spaces for a total of 474 required spaces. In 2002, the Central Area Planning Commission approved Case APCC-2002-1745-SPE and granted a Specific Plan Exception to permit reduced parking for the telecommunications use in the Terminal Annex building and required parking based on the "Warehouse" rate in Los Angeles Municipal Code Section 12.21.A.4(c)(1) of one space per 500 square feet for the first 10,000 square feet and one space per 5,000 square feet for the additional square footage. The approval also required parking for the post office use in compliance with Section 11.E.4 of the Specific Plan and mandated that no less than 276 parking spaces shall be provided. At the time of this approval, only approximately 52 percent of the Terminal Annex building was occupied by telecommunication uses, whereas now approximately 97.5 percent is occupied telecommunication uses, with 12,000 square feet occupied by the Post Office. Thus, the current parking demand is less than the parking demand when the postal uses occupied more of the Terminal Annex building. The approved Original Project included a Specific Plan Exception to reduce the parking to 208 spaces, based on a warehouse rate that would have required 185 spaces.

Data centers are almost exclusively occupied by telecommunications switching and computer equipment and typically have very few employees present at the site at any one time. Those few employees who are present are there primarily for operating, maintaining and servicing the equipment. There are no typically no guest visitors to data centers. The parking demand analysis prepared by Gibson Transportation Consultation, Inc. (the Gibson Study) concluded that the peak parking demand for all the uses (including the post office) would be 105 parking spaces during the week and 79 parking spaces on the weekend. Wes Pringle of LADOT reviewed the Gibson Study and concurred with its conclusions. Therefore, the proposed 113 spaces in the Revised Project would more than satisfy projected demand for the site uses and meet the required parking under the proposed Specific Plan Exception to allow the required parking on the project site to match the analysis of the Gibson Study.

The strict application of the non-residential project parking ratio contained in the Alameda District Specific Plan (1.1 spaces per 1,000 square feet of floor area) to the telecom uses of the subject site would result in practical difficulties and be inappropriate for the proposed uses, necessitating

the construction of unnecessary additional on-site parking facilities where there is little likelihood or evidence that actual demand exists to comply with this parking standard. Furthermore, the previously approved Original Project's supply of 208 parking spaces would require the construction of an unnecessary parking structure where LADWP has now indicated that they intend to build an electrical substation.

CONCLUSION

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

The Specific Plan Exception for reduced parking is appropriate because a data center, while it may have a large floor area, employs very few workers, functioning something like a warehouse for computers and telecommunications equipment. This forms the basis of the Gibson Study analysis concluding that 105 surface parking spaces would satisfy the peak parking demand for all of the uses on the project site, which LADOT reviewed and concurred with the findings. Reduced parking requirements were previously approved for the Original Project in October 2018, and reduced parking requirements were also approved on the site in 2002, and given a further approval in 2004 after a one-year review, for the data center now known as Coresite LA2 located in the Terminal Annex building on the subject Property.

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

CONDITIONS OF APPROVAL

A. Entitlement Conditions – Specific Plan Exception for Parking

1. **Parking Plan.** Parking on the subject site shall be provided in substantial conformance with the site plans labeled Exhibit B – Project Plans (Site Plan – Parking/DWP Option 2) and dated January 15, 2019, attached to the administrative case file.

   a. The minimum number of on-site parking spaces authorized by this action shall be provided in accordance with a parking analysis performed by a licensed engineer and reviewed by Los Angeles Department of Transportation (LADOT), such as the one dated January 23, 2019 performed by Gibson Transportation Consulting, Inc., attached as Exhibit E (Gibson Study), and with which LADOT concurred in an email dated March 21, 2019, included in Exhibit E.

   b. In no event shall there be fewer than 105 total on-site parking spaces provided.

2. **Landscaping (Surface Parking).** All parking on the subject site shall be landscaped and improved consistent with the requirements set forth in Section 12.21.A.6 (g) of the Municipal Code. A landscape and automatic irrigation plan shall be approved by the Department of City Planning prior to planting.

3. **Electric Vehicle Charging.** New construction shall comply with Section 99.04.106.4.1 and 99.04.106.4.2 to facilitate future installation and use of EV chargers. Electric vehicle supply equipment (EVSE) shall be installed in accordance with City of Los Angeles Electrical Code, Article 625.

B. Environmental Conditions

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

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

C. Administrative Conditions

5. **Approval, Verification and Submittals.** Copies of any approvals, guarantees or verification of consultations, review or approval, plans, etc., as may be required by the

subject conditions, shall be provided to the Planning Department for placement in the subject file.

6. **Code Compliance.** Area, height and use regulations of the zone classification of the subject property shall be complied with, except where herein conditions are more restrictive.

7. **Covenant.** Prior to the issuance of any permits relative to this matter, an agreement concerning all the information contained in these conditions shall be recorded in the County Recorder's Office. The agreement shall run with the land and shall be binding on any subsequent property owners, heirs or assign. The agreement must be submitted to the Planning Department for approval before being recorded. After recordation, a copy bearing the Recorder's number and date shall be provided to the Planning Department for attachment to the file.

8. **Definition.** Any agencies, public officials or legislation referenced in these conditions shall mean those agencies, public officials, legislation or their successors, designees or amendment to any legislation.

9. **Enforcement.** Compliance with these conditions and the intent of these conditions shall be to the satisfaction of the Planning Department and any designated agency, or the agency's successor and in accordance with any stated laws or regulations, or any amendments thereto.

10. **Building Plans.** Page 1 of the grants and all the conditions of approval shall be printed on the building plans submitted to the Department of City Planning and the Department of Building and Safety.

11. **Project Plan Modifications.** Any corrections and/or modifications to the Project plans made subsequent to this grant that are deemed necessary by the Department of Building and Safety, Housing Department, or other Agency for Code compliance, and which involve a change in site plan, floor area, parking, building height, yards or setbacks, building separations, or lot coverage, shall require a referral of the revised plans back to the Department of City Planning for additional review and final sign-off prior to the issuance of any building permit in connection with said plans. This process may require additional review and/or action by the appropriate decision-making authority including the Director of Planning, City Planning Commission, Area Planning Commission, or Board.

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

    (i) Defend, indemnify and hold harmless the City from any and all actions against the City relating to or arising out of, in whole or in part, the City's processing and approval of this entitlement, including but not limited to, an action to attack, challenge, set aside, void, or otherwise modify or annul the approval of the entitlement, the environmental review of the entitlement, or the approval of subsequent permit decisions, or to claim personal property damage, including from inverse condemnation or any other constitutional claim.
    (ii) Reimburse the City for any and all costs incurred in defense of an action related to or arising out of, in whole or in part, the City's processing and approval of the entitlement, including but not limited to payment of all court costs and attorney's fees, costs of any judgments or awards against the City (including an award of attorney's fees), damages, and/or settlement costs.

(iii) Submit an initial deposit for the City's litigation costs to the City within 10 days' notice of the City tendering defense to the Applicant and requesting a deposit. The initial deposit shall be in an amount set by the City Attorney's Office, in its sole discretion, based on the nature and scope of action, but in no event shall the initial deposit be less than $50,000. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).

(iv) Submit supplemental deposits upon notice by the City. Supplemental deposits may be required in an increased amount from the initial deposit if found necessary by the City to protect the City's interests. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).

(v) If the City determines it necessary to protect the City's interest, execute an indemnity and reimbursement agreement with the City under terms consistent with the requirements of this condition.

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

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

For purposes of this condition, the following definitions apply:

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

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

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

FINDINGS

ENTITLEMENT FINDINGS

SPECIFIC PLAN EXCEPTION FINDINGS

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

The project proposes the construction of a new 179,900-square-foot data center building that would house computer servers and supporting equipment for private clients. The new building would complement the existing use of the Terminal Annex building located on the site which is also owned and operated by the applicant and predominately used for data storage except for a small 12,000 square foot Post Office store. The project proposes to provide 113 surface parking spaces with 85 spaces located in a reconfigured surface parking lot west of the existing Terminal Annex building and 28 spaces located around the north and northeast perimeter of the project site, adjacent to the new data center building. These spaces would provide parking for both the proposed new data center building and the uses in the Terminal Annex building.

Section 11.E.4 of the Specific Plan requires 1.1 parking spaces per 1,000 square feet for all non-residential uses, which would require 198 parking spaces for the new building and the existing Terminal Annex building requires 276 spaces for a total of 474 required spaces. In 2002, the Central Area Planning Commission approved Case APCC-2002-1745-SPE and granted a Specific Plan Exception to permit reduced parking for the telecommunications use in the Terminal Annex building and required parking based on the “Warehouse” rate in Los Angeles Municipal Code Section 12.21.A.4(c)(1) of one space per 500 square feet for the first 10,000 square feet and one space per 5,000 square feet for the additional square footage. The approval also required parking for the post office use in compliance with Section 11.E.4 of the Specific Plan and mandated that no less than 276 total parking spaces shall be provided. At the time of this approval, only approximately 52 percent of the Terminal Annex building was occupied by telecommunication uses, whereas now approximately 97.5 percent is occupied telecommunication uses with 12,000 square feet occupied by the Post Office. Thus, the current parking demand is less than the parking demand when the postal uses occupied more of the Terminal Annex building. The approved Original Project included a Specific Plan Exception to reduce the parking to 208 spaces, based on a warehouse rate that would have required 185 spaces.

Data centers are almost exclusively occupied by telecommunications switching and computer equipment and typically have very few employees present at the site at any one time. Those few employees who are present are there primarily for operating, maintaining and servicing the equipment. There are no typically no guest visitors to data centers. A parking demand analysis prepared by Gibson Transportation Consultation, Inc., and dated January 23, 2019, (Gibson Study) concluded that the peak parking demand for all the uses (including the post office) would be 105 parking spaces during the week and 79 parking spaces on the weekend. Los Angeles Department of Transportation stated in an email dated March 21, 2019 that DOT “concurs with the results of the analysis that the site will provide enough spaces for the peak parking demand of the project.” Therefore, the proposed 113 spaces satisfy projected demand for the site uses,

and a minimum of 105 required spaces would be established under the proposed Specific Plan Exception to match the analysis of the Gibson Study.

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

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

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

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

The applicant's request to apply the analysis of the Gibson Study parking analysis to the development of the project site is consistent with prior entitlements recognizing that the data center uses would generate less parking demand than a more general commercial use. In 2002, the Central Area Planning Commission approved Case APCC-2002-1745-SPE and granted a Specific Plan Exception to permit reduced parking for the telecommunications uses located in the Terminal Annex building and required parking based on the "Warehouse" rate in Los Angeles Municipal Code Section 12.21.A.4(c)(1) of one space per 500 square feet for the first 10,000 square feet and one space per 5,000 square feet for the additional square footage. The approval also required parking for the post office use in compliance with Section 11.E.4 of the Specific Plan

and mandated that no less than 276 parking spaces shall be provided. At the time of this approval, only approximately 52 percent of the Terminal Annex building was occupied by telecommunication uses whereas now approximately 97.5 percent is occupied telecommunication uses with 12,000 square feet occupied by the Post Office. Thus, the current parking demand is less than the parking demand when the postal uses occupied more of the Terminal Annex building. The approved Original Project included a Specific Plan Exception to reduce the parking to 208 spaces, based on a warehouse rate that would have required 185 spaces. The Gibson Study concluded that the peak parking demand for all the uses (including the post office) would be 105 parking spaces during the week and 79 parking spaces on the weekend.

Because other properties in the Specific Plan area are devoted to uses which generate the need for the parking required under the Specific Plan, they are able to economically develop such parking and recover the cost through leases of their projects. Since the telecommunications use to which this facility is primarily devoted does not generate that need, it cannot lease the unneeded parking spaces, and therefore suffers unnecessary hardship if required to develop additional parking for which there is no economic or practical use, and no ability to recover the cost of providing it through rent. Furthermore, LADWP has indicated that they intend to build an electrical substation in the approximate location of the parking structure approved under the current Specific Plan Exception to accommodate more parking spaces than analysis shows the demand would be. Therefore, an exception from the Specific Plan is necessary for the preservation and enjoyment of a substantial property right or use generally possessed by other property within the specific plan area in the same zone and vicinity but which, because of special circumstances and practical difficulties or unnecessary hardships is denied to the property in question.

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

The requested exception will adjust the parking requirements to a level consistent with the use and demand of the project, adequate to provide on-site parking for all vehicles of those occupying and visiting the data center and post office uses. The requested exception will adjust the parking requirement for the proposed telecom use to match the peak demand analyzed in the Gibson Study. This will be adequate to provide sufficient on-site parking without detriment to the surrounding area, while other office and retail uses of the site will still comply with the 1.1 spaces per 1,000 square feet of floor area required for those uses by the Specific Plan. As such, the granting of an exception will not be detrimental to the public welfare or injurious to the property or improvements adjacent to or in the vicinity of the subject property.

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

Granting the exception is consistent with the Specific Plan's and General Plan's goals of efficient land use and rational, efficient flexibility in providing parking as described above. The property is located to be planned and redeveloped in a more efficient and rational manner, with possible use of shared parking or development of parking structures to provide for actual parking need. Analysis shows that the parking exception requested would provide adequate parking by the proposed uses even under the maximum demand situation. The requested exception is consistent with the encouraged flexibility regarding parking that is inherent in Section 11.E of the Specific Plan (e.g., shared parking and reduced parking).

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

For this reason, actual need for parking spaces at this facility will be substantially lower than the Specific Plan's minimum 1.1/1,000 requirement, which was adopted in anticipation of typical office uses. The Gibson Study analyzed the parking demand anticipated for the actual proposed use, consistent with the existing Coresite LA2 data center parking demand. As such, the granting of an exception will be consistent with the principles, intent and goals of the specific plan and any applicable element of the general plan.

CEQA Findings

An Addendum to the Environmental Impact Report (EIR), dated July 5, 2018, for the Alameda District Specific Plan that was certified on June 18, 1996, was prepared for the original data center project that analyzed and disclosed the environmental effects that might reasonably result from proposed changes to development under the Specific Plan approved in 1996. At the time there was no separate Environmental case number assigned to an EIR; the original EIR is identified as being associated with Case No. CPC-1993-442-SP, State Clearinghouse No. 1994031006. As demonstrated in the Addendum, the project would not substantially increase the severity of the previously identified impacts in the Specific Plan EIR, and no new significant impacts would occur with implementation of the data center project. The applicable mitigation measures in the EIR would be required to be implemented by the data center project and no new additional mitigation measures are necessary. The contents of the Addendum prepared for the Original Project approved on October 9, 2018 also apply equally to the Revised Project presented to the Central Area Planning Commission on May 14, 2019.

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

PUBLIC HEARING AND COMMUNICATIONS

The public hearing for this Revised Project was waived, with the legally required public hearing to occur at the Central Area Planning Commission decision hearing on May 14, 2019. This waiver was granted due to the expected low level of public interest in the project, considering that it is merely a revision in the parking requirement for the original data center project already approved on October 9, 2018, which received no public opposition.

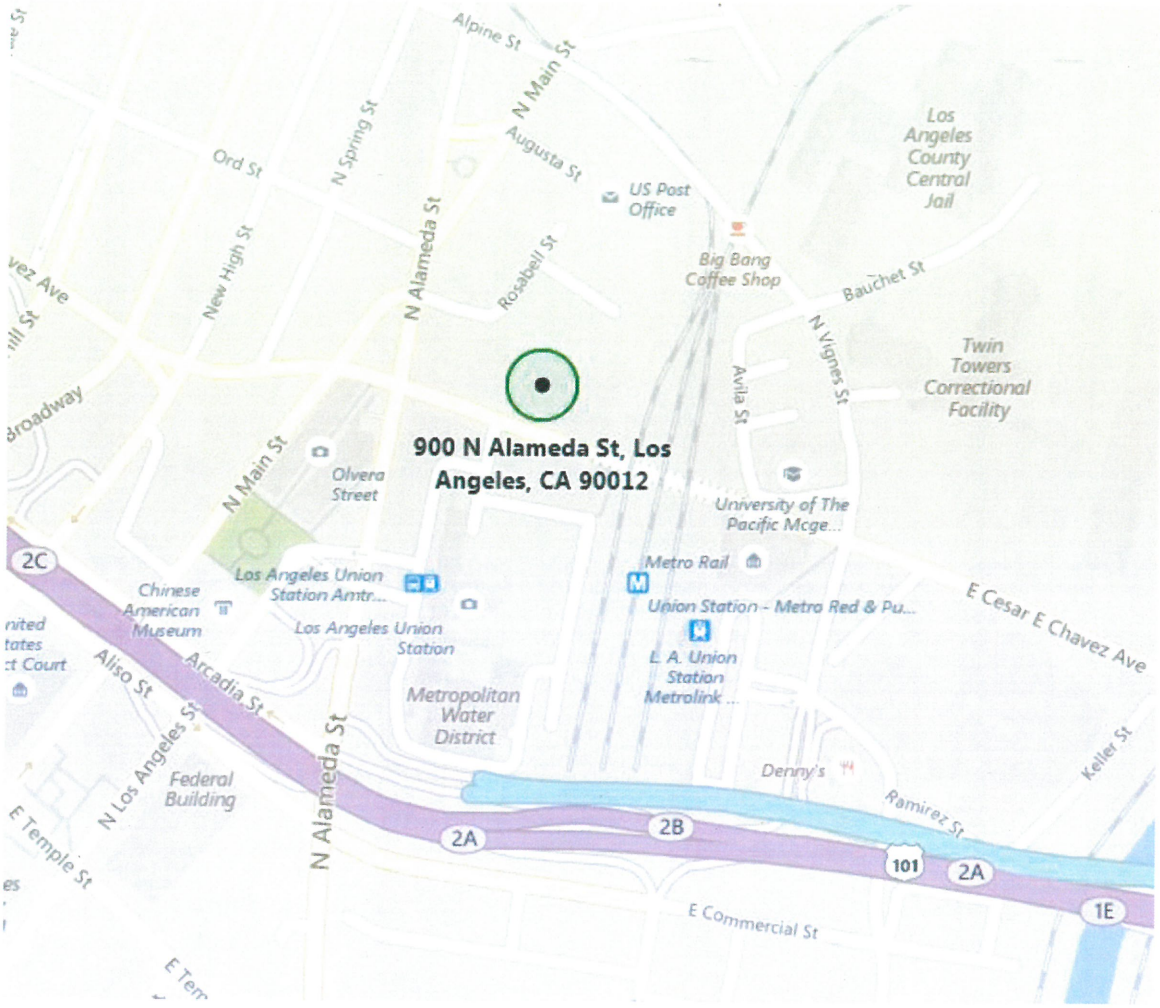
No communications have been received from the public regarding this case.

EXHIBIT A – MAPS

A1 – Vicinity Map

A2 – Radius Map

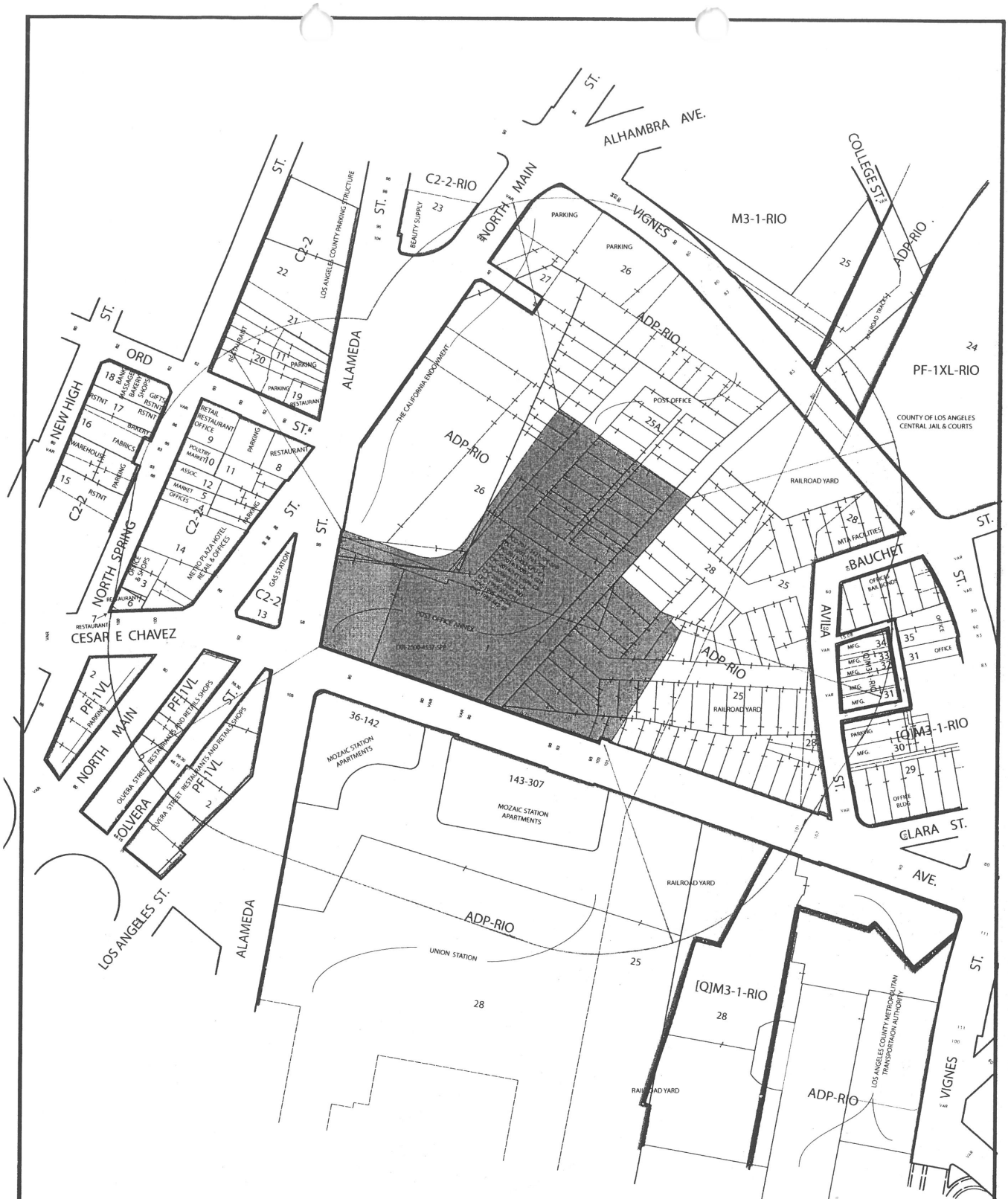
Vicinity Map



Address: 900 N. ALAMEDA STREET, LOS ANGELES

QMS 17-242B

APCC 2019-1653



APCC2019-1653

SPECIFIC PLAN EXCEPTION

QMS Quality Mapping Service

14549 Archwood St. Suite 301
Van Nuys, California 91405
Phone (818) 997-7949 - Fax (818) 997-0351
qmapping@qesqms.com

DRAWN BY:

THOMAS BROTHERS
Page: 634 **Grid:** G,H-3

LEGAL
"SEE APPLICATIONS"

A.P.N.
5409-015-(015-017,021)

CD: 14

CT: 2060.20

PA: CENTRAL CITY

USES: FIELD

SITE ADDRESS
900 ALAMEDA ST.

CASE NO:

SCALE: 1"=100'

D.M.: 133.5A215,123.5A217
132A215,132A217

CONTACT: ARMBURSTER GOLDSMITH DELVAC

PHONE: 310-209-8800

NORTH

DATE: ~~05-25-17~~
Update: 06-28-18
03-12-19

NET AC: 8.44 +/-

QMS: 17-2428

EXHIBIT B – PROJECT PLAN

Site Plan

CORESITE

Parking Summary	
Alameda Lot	41 Standard Spaces
	44 Compact Spaces
North Lot	23 Standard Spaces
	5 Compact Spaces
Total Site Parking	113 Spaces

dcm | dotterweich carlson mehner design, inc.

LA3

Site Plan - Parking/DWP Option 2

SCALE: Not To Scale

DATE: January 15, 2019

EXHIBIT C – ENVIRONMENTAL CLEARANCE

Addendum Dated July 5, 2018

to the Previously Certified Environmental Impact Report

for Case No. CPC-1993-442-SP

State Clearinghouse No. 1994031006

Certified June 18, 1996

The Addendum may be found at:

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

EXHIBIT D – MITIGATION MONITORING PLAN

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

Mitigation, Monitoring, and Reporting Program (MMRP)

City File No: ENV-2017-2422-EAF

Prepared for:

The City of Los Angeles

Department of City Planning

Prepared by:

Circlepoint

200 Webster Street, Suite 200

Oakland, CA 94607

June 2018

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Mitigation, Monitoring, and Reporting Program

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

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

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

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

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

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

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

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

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

Environmental Factor	*Mitigation Measures*	*Responsible Party*	*Timing*
	be required to pay a fee of $862,568 to the LAUSD. L.4.1 – The project design shall incorporate the following key principles of the ADP: ▪ Continue the style and intent of the historic courtyard spaces. ▪ Connect open spaces into one continuous system ▪ Provided open spaces with diverse size, style, and character.		
Parks and Recreation	L.4.1 – The project design shall incorporate the following key principles of the ADP: ▪ Continue the style and intent of the historic courtyard spaces. ▪ Connect open spaces into one continuous system ▪ Provided open spaces with diverse size, style, and character.	Project Applicant	Pre-Construction
Water, Solid Waste and Disposal, Public Services	M.1.1.a – Automatic sprinkler system shall be set to irrigate landscaping during early morning hours or during the evening to reduce water losses from evaporation. Landscaping shall be watered less often during cooler months and the rainfall season. M.1.1.b – Wherever possible, the use of reclaimed water shall be investigated as a source to irrigate large landscaped areas such as pedestrian plazas, landscaped walkways, and other open spaces. M.1.1.c – Selection of drought-tolerant, low water consuming plant varieties shall be used to reduce irrigation water consumption in new landscaped areas such as pedestrian plazas, walkways, and other open spaces. M.1.1.d – Recirculating hot water system shall be used where feasible in long piping systems (where water must be run for considerable periods before hot water is received at the outlet). M.1.1.e – Lower-volume water faucets and water saving showerheads shall be installed in new construction and when remodeling as well as low flush toilets in all restrooms. M.1.1.f – Plumbing fixtures shall be selected which reduce potential water loss from leakage due to excessive wear of washers. M.1.1.g – Phase I of the project shall comply with all applicable sections of the City of Los Angeles' Water Conservation Ordinance (Ordinance No. 166,080) and Xeriscape Ordinance. M.2.1 – Although short-term construction impacts so solid waste and disposal services are considered	Project Applicant, Contractor	Pre-Construction, Operation

Environmental Factor	Mitigation Measures	Responsible Party	Timing
	less than significant, the following mitigation measure shell be implemented to further reduce adverse impacts: The project sponsor shall demonstrate that all construction and demolition debris, to the maximum extent feasible, will be recycled in a practical, available, and accessible manner during the construction phase. Documentation of this recycling program will be provided to the City of Los Angeles, Department of Public Works. M.2.2.a – In accordance with AB939, the City's SRRE and the City's SWMPP, the project sponsor shall prepare and submit a SRRP to the Planning Department prior to the approval of individual building permits, both documenting and outlining the incorporation of an on-site recycling/conservation program through a series of mandatory measures including, but not limited to, the following items: ▪ Instituting a tenant/employee participation recycling program, whereby tenants/employees are given individual containers/bins to separate newsprint, white, and/or colored paper for regular custodian collection and deposit into larger separation containers to be removed by appropriate recyclers or haulers providing such services. ▪ Instituting a tenant/employee education program which would, through a series of brief educational sessions, outline various methods whereby employees can further contribute to methods of recycling/conservation in the office and home (e.g., contracting with firms for purchase of recycled papers, use of two-sided reports, replacement of Styrofoam cups with coffee mugs, etc.). M.2.2.b – the project shall incorporate the use of recycled materials in building materials, furnishings, operations, and building maintenance, to the extent feasible and allowed by local codes. The SRRP shall describe the use of these materials in the project. M.2.2.c –A statement shall be included in the SRRP that instructs occupants about source reduction, recycling, and procurement of recycled materials. This statement shall be incorporated into the future ownership agreements, property management agreements, and tenant agreements. M.2.2.d – A statement shall be included in the SRRP that specifies which of the following entities will provide collection of trash and source separated materials – the City of Los Angeles; project sponsor or property management service; independent recycling contractor; or private solid waste collector who provides recycling services.		

Environmental Factor	Mitigation Measures	Responsible Party	Timing
	M.2.2.e –The project owner, within its property management agreements, shall conduct an annual waste audit review and measure the effectiveness of the tenant education program and recycling collection activities. To the greatest extent possible, the audit shall include: ▪ Review of purchasing patterns to eliminate materials not compatible with the established waste diversion program. ▪ Review of operating procedures which generate either large amounts of waste or non-recyclable materials. ▪ Review of company uses and activities. ▪ Evaluation and expansion of recyclable materials to be included in a recycling program. ▪ Review of employee awareness of recycling program goals, procedures, and accomplishments. Evaluation and implementation of training for all project occupants. The results of the study shall be used to improve the Source Reduction and Recycling Plan (SRRP) to reduce solid waste generation. The SRRP shall describe the methods by which designated recyclable materials will be separated from the waste stream, collected, and stored, to facilitate transportation to a recycler or hauler providing such services. M.2.2.f – The design of recycling systems shall facilitate source separation and collection of additional materials that may be designated as recyclable by the City in the future. M.2.2.g – To the extent feasible, one or more of the following yard waste management techniques shall be incorporated into the maintenance of the project: ▪ Planting drought tolerant plants so as to minimize yard waste. ▪ Mulching and grass-recycling. ▪ Local composting through regular landscape maintenance where appropriate. M.2.3.a – The property owner will provide information to project occupants and operators regarding alternatives to commonly used hazardous materials in the business and governmental environment, as well as information regarding the proper storage, handling and disposal of hazardous waste. M.2.3.b – The project will comply with all applicable regulations and/or measures outlined in the City of Los Angeles Household Hazardous Waste Element (HHWE). M.3.1.a – The project shall implement all water-conserving mitigation measures as outlined for Phase		

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

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

EXHIBIT E – PARKING STUDY AND LADOT CONCURRENCE

Connect Create Collaborate

Adam Villani <adam.villani@lacity.org>

CoreSite LA3 Parking Study

Wes Pringle <wes.pringle@lacity.org> Thu, Mar 21, 2019 at 4:36 PM
To: Adam Villani <adam.villani@lacity.org>
Cc: Shawn Kuk <shawn.kuk@lacity.org>, Heather Bleemers <Heather.Bleemers@lacity.org>, Patrick Gibson <pgibson@gibsontrans.com>

Hi Adam,

DOT has reviewed the parking analysis for the Terminal Annex Project, dated January 23, 2019, prepared by Gibson Transportation Consulting. The analysis evaluated the parking demand for a 459,000 square-foot Data Center server center and 12,000 square-foot post office. DOT concurs with the results of the analysis that the site will provide enough spaces for the peak parking demand of the project.

Wes

[Quoted text hidden]

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Wes Pringle. P.E.

Transportation Engineer
Metro Development Review

100 S. Main Street, 9th Floor

Los Angeles, CA 90012

Cell Phone: 213-718-0713

Los Angeles Department of Transportation
213.972.8482

Gibson
transportation consulting, inc.

MEMORANDUM

TO: Mark Armbruster, AGD

FROM: Patrick A. Gibson, P.E., PTOE
Richard Gibson, LEED Green Associate

DATE: January 23, 2019

RE: Parking Analysis for
Terminal Annex
Los Angeles, California **Ref:** J1546

Gibson Transportation Consulting, Inc. (GTC) conducted an evaluation of the parking supply and demand for the proposed expansion of the Terminal Annex site (Project) in the City of Los Angeles, California. The parking study, completed in August 2018, was conducted as part of the entitlement process for the Project. Since receiving approval from the City of Los Angeles, possible site design changes within the Project resulting from potential new requirements from LADWP have prompted reconsideration of the original proposals for on-site parking. This memo describes the proposed changes.

PROJECT DESCRIPTION

Terminal Annex, on the northeast corner of Alameda Street & Cesar E. Chavez Avenue, currently contains approximately 471,000 square feet (sf) of development, including a 459,000 sf of Data Center server farm and a 12,000 sf Post Office.

The Project involves construction a new 179,900 sf building to house additional computer server equipment to expand the Data Center server farm and the provision of on-site parking to serve the needs of the Project. The Project will replace two existing surface parking lots.

The expansion that was approved in 2018 included a parking supply that included both a surface parking lot and a parking garage that provided a total of 208 spaces on the Project site. This parking supply exceeded the parking demand of the Project.

PROPOSED CHANGES

The Project will provide server farm capability for the Los Angeles Department of Water and Power (DWP). DWP may now require the Project to include a large electric substation

to serve their needs and the physical characteristics of this substation may preclude the ability of the Project to provide a parking structure on the site.

Thus, the Project may be redesigned to include the substation and a series of on-site smaller surface parking lots to accommodate the Project demand. The site plan shown in Figure 1 indicates that a total of 113 on-site parking spaces could be provided in two surface parking lots.

This memo will evaluate the adequacy of that supply to meet the projected Project parking demand.

BACKGROUND

As part of the 2018 approval process, the Project proposal was the subject of a detailed parking analysis. On-site parking occupancy surveys were conducted, a Shared Parking model was developed and calibrated, and the model was used to project the future parking demands of the expanded Project. The following paragraphs summarize that 2018 parking analysis.

Existing Parking

Parking Supply

Based on a March 2017 parking inventory, Terminal Annex provided 253 parking spaces in three surface parking lots. One of the parking lots serves mainly the Post Office, but also served visitors to other sites in the area including The California Endowment, Union Station, and Olvera Street. The remaining two surface lots currently serve the Data Center server farm portions of the development. Access to these two surface lots is provided via one shared driveway off Bauchet Street.

Parking Demand

In order to document the existing parking demand patterns, GTC conducted parking occupancy surveys at Terminal Annex on Saturday, March 11, Tuesday, March 14, and Wednesday, March 15, 2017. Hourly occupancy counts were conducted from 10:00 AM until 10:00 PM on all three days.

The results of the parking demand surveys and driveway counts are provided in the Attachment. As shown, the peak parking demand on a weekday occurred at 1:00 PM, when 73 spaces (approximately 29% of the parking supply) were occupied by Terminal Annex users. The peak parking demand on a Saturday occurred at 2:00 PM, when 54 parking spaces (approximately 21%) were occupied by Terminal Annex users.

The parking occupancy patterns for both the weekday and Saturday show that Terminal Annex experiences its peak parking demand during the mid-day hours, which is typical for a commercial-based development. The Saturday demand is lower than weekday demand because of the lower activity levels during the weekend.

Shared Parking Model

The existing parking demand rate was developed using a two-step process: identifying the breakdown of customer and employee-generating land uses within the site and then calibrating the *Shared Parking, 2nd Edition* (Urban Land Institute [ULI] and the International Council of Shopping Centers [ICSC], 2005) model to replicate the conditions at Terminal Annex.

Two key data sets were utilized in the Shared Parking model calibration: actual parking utilization data and the amount of existing active floor area.

Parking Utilization Data. The March 2017 parking occupancy surveys included typical weekday and weekend conditions and both customer and employee parking areas.

The parking utilization studies formed the basis for the development of the existing parking occupancy pattern. The model was then calibrated to align with the existing site conditions in the month of March in order to accurately predict parking occupancy during other times of the year.

Existing Active Floor Area. The shared parking model utilizes floor area as the metric to determine parking demand for each land use, so an accurate inventory of usable floor area, at the time of the utilization survey, is required for the calibration process. At the time of the surveys, both the Data Center and Post Office were fully utilized.

The model was calibrated using the existing floor area data in conjunction with the actual parking utilization data. The following floor areas were considered occupied and usable for the calibration:

- 459,000 sf Data Center
- 12,000 sf Post Office

The shared parking model was calibrated to reflect March parking conditions and the seasonal variations in the model suggested that December would be the busiest month of the year. Table 1 shows the calibrated parking model results, indicating that the peak parking demand for the site would occur at 1:00 PM on a December weekday (80 occupied spaces) and 1:00 PM on a December weekend (57 occupied spaces). This result corresponds to the peak demands measured in the parking occupancy counts when seasonal variations are taken into account. Charts 1 and 2 summarize this data in graphical form.

Table 2 provides an hourly breakdown of parking demand for the entire site on weekdays and weekends. Chart 3 provides a graphical summary of the hourly parking patterns during the busiest month of the year.

FUTURE PARKING

Parking Supply

The Project will require the removal of the two surface parking lots to accommodate the new building and the proposed substation. When the remaining surface parking lot is restriped, it will provide 113 spaces on-site to accommodate visitor and employee parking demand.

Parking Demand

The future parking for the site with the Project was determined by applying the observed parking demand rates to the future available square footage of parking demand generating uses. The peak parking demand was then calculated using the calibrated shared parking model. The results are presented in Tables 3 and 4 and Charts 4-6.

The numbers presented in Table 3 represent the anticipated parking demand during the peak hour of the peak day of the peak month (i.e., December) of the year for the site. In other words, these anticipated parking demands represent the busiest hour of the year at the site.

Peak December Parking Demand. As shown in Table 3, with the Project, the following site-related peak parking demand is projected for the month of December:

Day	Time	Projected Demand
Weekday	1:00 PM	105 spaces
Weekend	2:00 PM	79 spaces

The projected peak parking demand of 105 spaces includes 70 customer spaces and 35 employee spaces. Given a parking supply of 113 spaces, Terminal Annex could accommodate its parking demand at all times of the year. Charts 3 and 4 summarize this data in graphical form.

Table 4 provides an hourly breakdown of parking demand for the entire site on weekdays and weekends. Chart 6 provides a graphical summary of this data.

As shown, the parking demand never exceeds supply.

Comparison of Future Parking Demand and Supply

With the Project and the site completely occupied, the proposed on-site parking supply of 113 spaces and peak parking demand of 105 spaces will result in a surplus of eight spaces.

SUMMARY

- The Project proposes to construct a 179,900 sf building to house additional Data Center server farm uses. It also proposes to reconfigure the site to provide two on-site surface parking lots to provide a total of 113 parking spaces on site.

- With completion of the Project, the projected peak parking demand for the site is 105 parking spaces on a weekday and 79 parking spaces on a weekend.

- Given a parking supply of 113 spaces, the site could accommodate site-related peak parking demands at all times of the year.

- Thus, even without the parking garage that was a part of the original proposal for the site, as long as the on-site parking supply accommodates at least 105 parking spaces, the peak demand for the Project would be met by the on-site supply.

Table and Charts of the Shared Parking Model

TABLE 1
SHARED PARKING DEMAND SUMMARY
CALIBRATED EXISTING CONDITIONS

PEAK MONTH: DECEMBER -- PEAK PERIOD: 1 PM, WEEKDAY

Projected Parking Supply:	253 Stalls		Weekday					Weekend					Weekday			Weekend		
	Project Data		Base	Mode	Non-Captive	Project		Base	Mode	Non-Captive	Project		Peak Hr Adj	Peak Mo Adj	Estimated Parking	Peak Hr Adj	Peak Mo Adj	Estimated Parking
Land Use	Quantity	Unit	Rate	Adj	Ratio	Rate	Unit	Rate	Adj	Ratio	Rate	Unit	1 PM	December	Demand	1 PM	December	Demand
Terminal Annex Server Farm	459,000	sf GLA	0.09	1.00	1.00	0.09	/ksf GLA	0.09	1.00	1.00	0.09	/ksf GLA	1.00	1.00	41	0.78	1.00	32
Employee			0.04	1.00	1.00	0.04	/ksf GLA	1.00	1.00	1.00	1.00	/ksf GLA	1.00	1.00	18	0.78	1.00	9
Post Office	12,000	sf GLA	2.00	1.00	1.00	2.00	/ksf GLA	2.00	1.00	1.00	2.00	/ksf GLA	0.54	0.95	12	0.30	0.95	7
Employee			0.75	1.00	1.00	0.75	/ksf GLA	0.75	1.00	1.00	0.75	/ksf GLA	1.00	1.00	9	1.00	1.00	9
													Customer		53	Customer		39
													Employee		27	Employee		18
													Reserved		0	Reserved		0
													Total		**80**	**Total**		**57**

ULI base data have been modified from default values.

TABLE 2
PEAK MONTH SHARED PARKING SUMMARY
CALIBRATED EXISTING CONDITIONS

December																								
Weekday Estimated Peak-Hour Parking Demand																								
Projected Parking Supply: 253 Stalls																					Overall Pk	AM Peak Hr	PM Peak Hr	Eve Peak Hr
	Monthly Adj.	6 AM	7 AM	8 AM	9 AM	10 AM	11 AM	12 PM	1 PM	2 PM	3 PM	4 PM	5 PM	6 PM	7 PM	8 PM	9 PM	10 PM	11 PM	12 AM	1 PM	11 AM	1 PM	6 PM
Terminal Annex Server Farm	100%	8	13	13	21	24	30	37	41	31	24	18	22	15	8	8	8	10	5	2	41	30	41	15
Employee	100%	4	6	6	9	11	13	16	18	13	11	8	10	6	4	3	4	4	2	1	18	13	18	6
Post Office	95%	-	-	-	9	17	23	14	12	14	16	12	10	8	-	-	-	-	-	-	12	23	12	8
Employee	100%	1	2	5	9	9	9	9	9	9	9	7	9	9	5	2	-	-	-	-	9	9	9	9
Subtotal Demand by User Type	Customer	8	13	13	30	41	53	51	53	45	40	30	32	23	8	8	8	10	5	2	53	53	53	23
	Employee	5	8	11	18	20	22	25	27	22	20	15	19	15	9	5	4	4	2	1	27	22	27	15
	Reserved	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
GRAND TOTAL DEMAND		13	21	24	48	61	75	76	80	67	60	45	51	38	17	13	12	14	7	3	80	75	80	38
ULI base data have been modified from default values.																					80	75	80	38

Footnote(s):

December																								
Weekend Estimated Peak-Hour Parking Demand																								
																					Overall Pk	AM Peak Hr	PM Peak Hr	Eve Peak Hr
	Monthly Adj.	6 AM	7 AM	8 AM	9 AM	10 AM	11 AM	12 PM	1 PM	2 PM	3 PM	4 PM	5 PM	6 PM	7 PM	8 PM	9 PM	10 PM	11 PM	12 AM	1 PM	11 AM	1 PM	6 PM
Terminal Annex Server Farm	100%	6	10	20	16	14	18	15	32	41	39	31	23	8	6	6	4	4	2	2	32	18	32	8
Employee	100%	2	3	5	4	4	5	4	9	11	11	8	6	2	2	2	1	1	1	1	9	5	9	2
Post Office	95%	-	-	-	11	17	23	17	7	-	-	-	-	-	-	-	-	-	-	-	7	23	7	-
Employee	100%	-	2	5	5	5	9	9	9	5	5	7	9	9	7	5	-	-	-	-	9	9	9	9
Subtotal Demand by User Type	Customer	6	10	20	27	31	41	32	39	41	39	31	23	8	6	6	4	4	2	2	39	41	39	8
	Employee	2	5	10	9	9	14	13	18	16	16	15	15	11	9	7	1	1	1	1	18	14	18	11
	Reserved	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
GRAND TOTAL DEMAND		8	15	30	36	40	55	45	57	57	55	46	38	19	15	13	5	5	3	3	57	55	57	19
ULI base data have been modified from default values.																					57	55	57	19

CHART 1
WEEKDAY MONTH-BY-MONTH ESTIMATED PARKING DEMAND
CALIBRATED EXISTING CONDITIONS

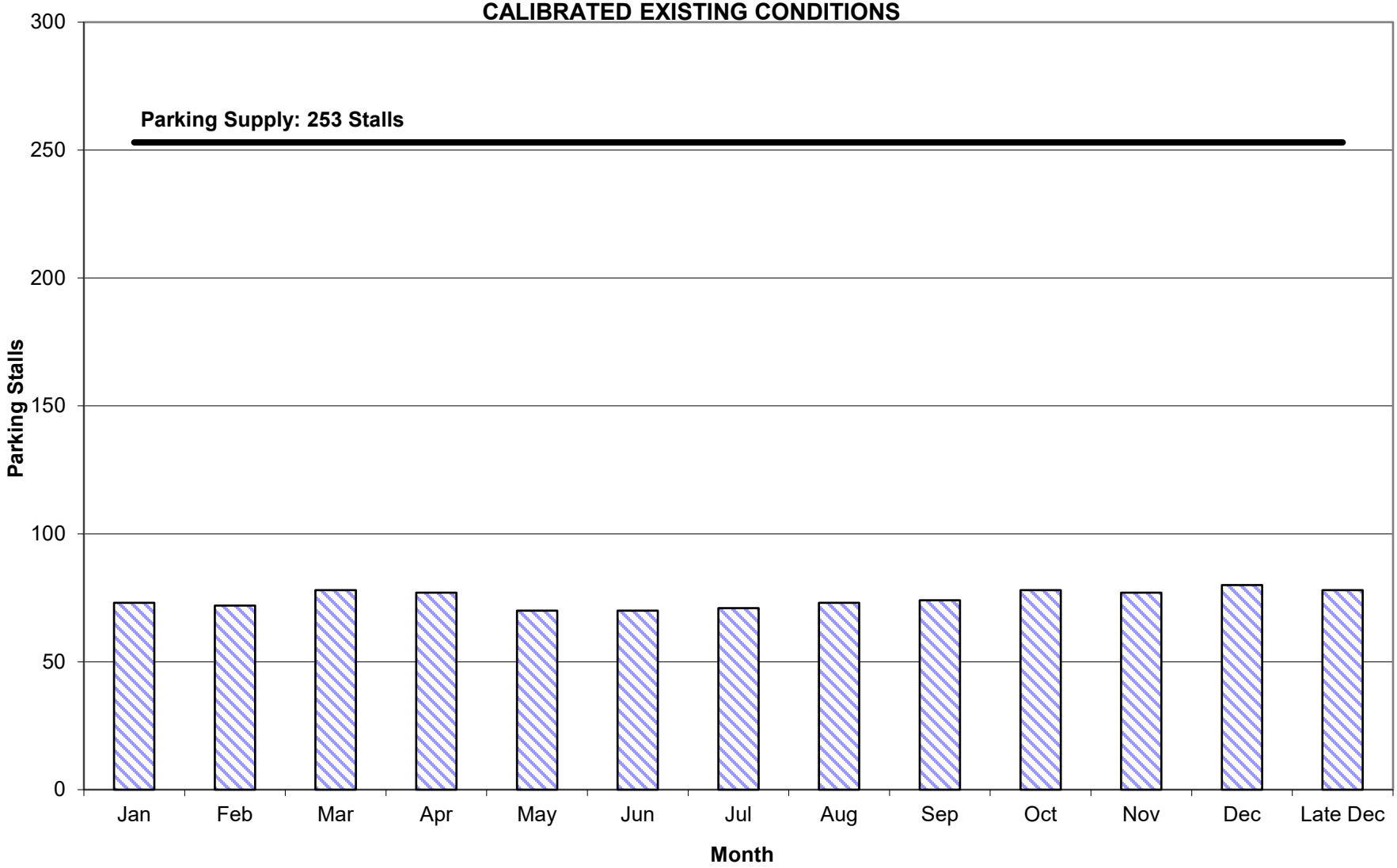

CHART 2
WEEKEND MONTH-BY-MONTH ESTIMATED PARKING DEMAND
CALIBRATED EXISTING CONDITIONS

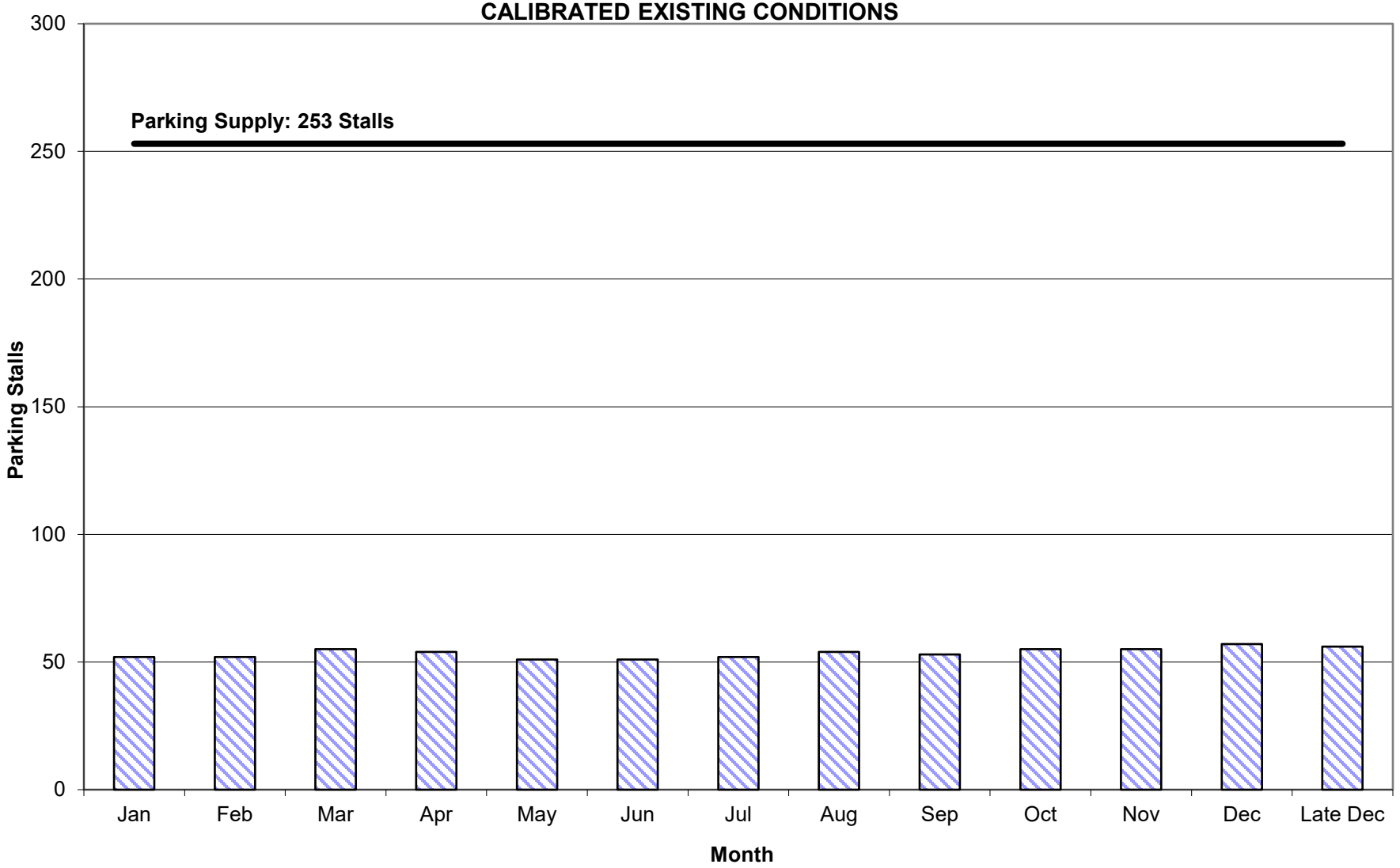

CHART 3
PEAK MONTH DAILY PARKING DEMAND BY HOUR
CALIBRATED EXISTING CONDITIONS

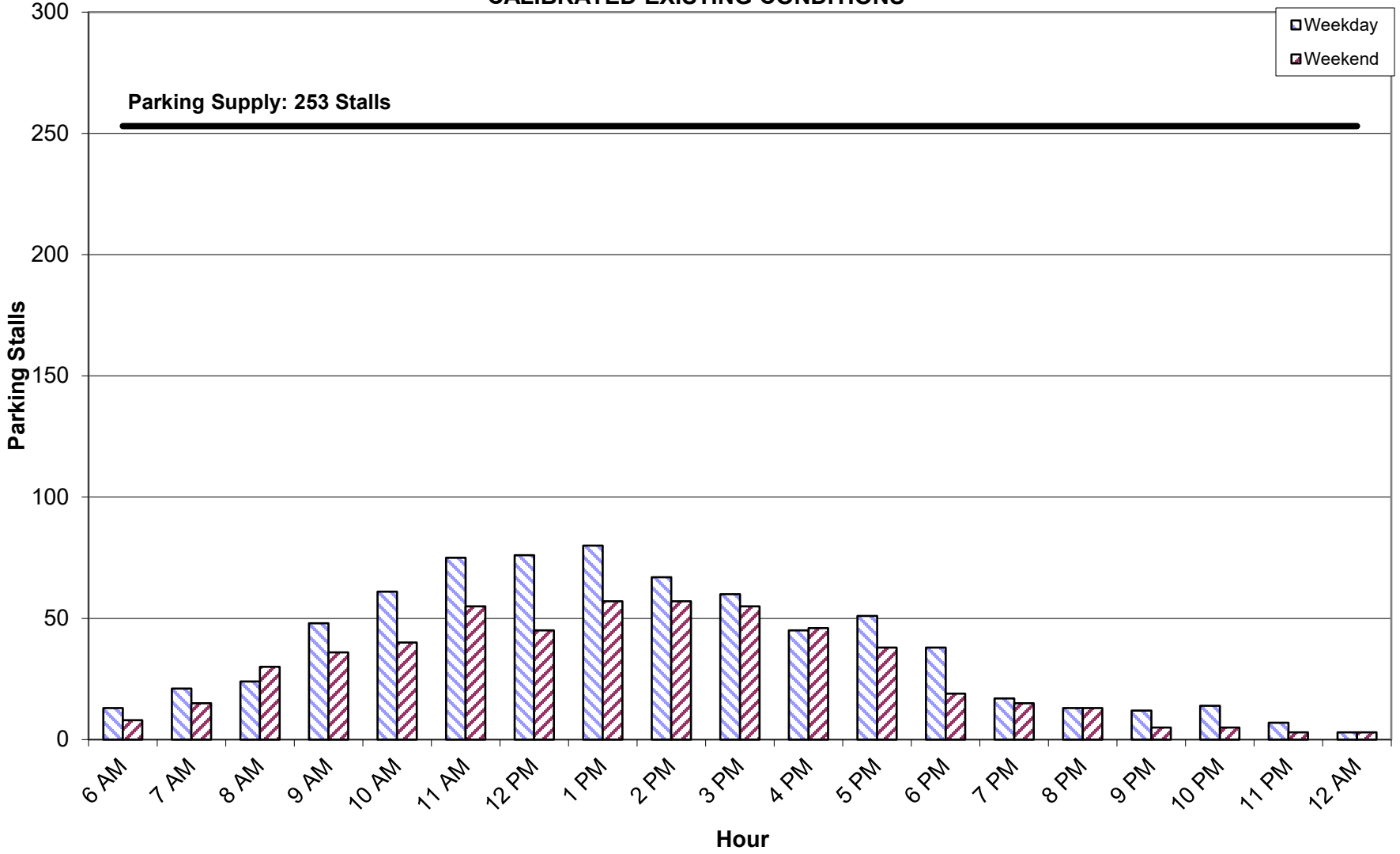

TABLE 3
SHARED PARKING DEMAND SUMMARY
FUTURE CONDITIONS WITH SERVER FARM EXPANSION

PEAK MONTH: DECEMBER -- PEAK PERIOD: 1 PM, WEEKDAY

Projected Parking Supply:	113 Stalls		Weekday					Weekend					Weekday			Weekend		
Land Use	Project Data Quantity	Unit	Base Rate	Mode Adj	Non-Captive Ratio	Project Rate	Unit	Base Rate	Mode Adj	Non-Captive Ratio	Project Rate	Unit	Peak Hr Adj 1 PM	Peak Mo Adj December	Estimated Parking Demand	Peak Hr Adj 2 PM	Peak Mo Adj December	Estimated Parking Demand
Terminal Annex Server Farm	638,900	sf GLA	0.09	1.00	1.00	0.09	/ksf GLA	0.09	1.00	1.00	0.09	/ksf GLA	1.00	1.00	58	1.00	1.00	58
Employee			0.04	1.00	1.00	0.04	/ksf GLA	1.00	1.00	1.00	1.00	/ksf GLA	1.00	1.00	26	1.00	1.00	16
Post Office	12,000	sf GLA	2.00	1.00	1.00	2.00	/ksf GLA	2.00	1.00	1.00	2.00	/ksf GLA	0.54	0.95	12	0.00	0.95	0
Employee			0.75	1.00	1.00	0.75	/ksf GLA	0.75	1.00	1.00	0.75	/ksf GLA	1.00	1.00	9	0.50	1.00	5
													Customer		70	Customer		58
													Employee		35	Employee		21
													Reserved		0	Reserved		0
													Total		**105**	**Total**		**79**

ULI base data have been modified from default values.

TABLE 4
PEAK MONTH SHARED PARKING SUMMARY
FUTURE CONDITIONS WITH SERVER FARM EXPANSION

December
Weekday Estimated Peak-Hour Parking Demand

Projected Parking Supply: 113 Stalls																					Overall Pk	AM Peak Hr	PM Peak Hr	Eve Peak Hr
	Monthly Adj.	6 AM	7 AM	8 AM	9 AM	10 AM	11 AM	12 PM	1 PM	2 PM	3 PM	4 PM	5 PM	6 PM	7 PM	8 PM	9 PM	10 PM	11 PM	12 AM	1 PM	11 AM	1 PM	6 PM
Terminal Annex Server Farm	100%	12	19	19	29	34	42	52	58	43	34	26	31	21	12	11	12	14	7	3	58	42	58	21
Employee	100%	5	8	8	13	15	19	23	26	19	15	11	14	9	5	5	5	6	3	1	26	19	26	9
Post Office	95%	-	-	-	9	17	23	14	12	14	16	12	10	8	-	-	-	-	-	-	12	23	12	8
Employee	100%	1	2	5	9	9	9	9	9	9	9	7	9	9	5	2	-	-	-	-	9	9	9	9
Subtotal Demand by User Type	Customer	12	19	19	38	51	65	66	70	57	50	38	41	29	12	11	12	14	7	3	70	65	70	29
	Employee	6	10	13	22	24	28	32	35	28	24	18	23	18	10	7	5	6	3	1	35	28	35	18
	Reserved	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
GRAND TOTAL DEMAND		18	29	32	60	75	93	98	105	85	74	56	64	47	22	18	17	20	10	4	105	93	105	47
ULI base data have been modified from default values.																					105	93	105	47

Footnote(s):

December
Weekend Estimated Peak-Hour Parking Demand

																					Overall Pk	AM Peak Hr	PM Peak Hr	Eve Peak Hr
	Monthly Adj.	6 AM	7 AM	8 AM	9 AM	10 AM	11 AM	12 PM	1 PM	2 PM	3 PM	4 PM	5 PM	6 PM	7 PM	8 PM	9 PM	10 PM	11 PM	12 AM	2 PM	11 AM	2 PM	6 PM
Terminal Annex Server Farm	100%	9	15	28	23	20	25	22	45	58	56	44	32	11	9	9	6	6	3	3	58	25	58	11
Employee	100%	2	4	8	6	6	7	6	13	16	15	12	9	3	2	2	2	2	1	1	16	7	16	3
Post Office	95%	-	-	-	11	17	23	17	7	-	-	-	-	-	-	-	-	-	-	-	-	23	-	-
Employee	100%	-	2	5	5	5	9	9	9	5	5	7	9	9	7	5	-	-	-	-	5	9	5	9
Subtotal Demand by User Type	Customer	9	15	28	34	37	48	39	52	58	56	44	32	11	9	9	6	6	3	3	58	48	58	11
	Employee	2	6	13	11	11	16	15	22	21	20	19	18	12	9	7	2	2	1	1	21	16	21	12
	Reserved	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
GRAND TOTAL DEMAND		11	21	41	45	48	64	54	74	79	76	63	50	23	18	16	8	8	4	4	79	64	79	23
ULI base data have been modified from default values.																					79	64	79	23

CHART 4
WEEKDAY MONTH-BY-MONTH ESTIMATED PARKING DEMAND
FUTURE CONDITIONS WITH SERVER FARM EXPANSION

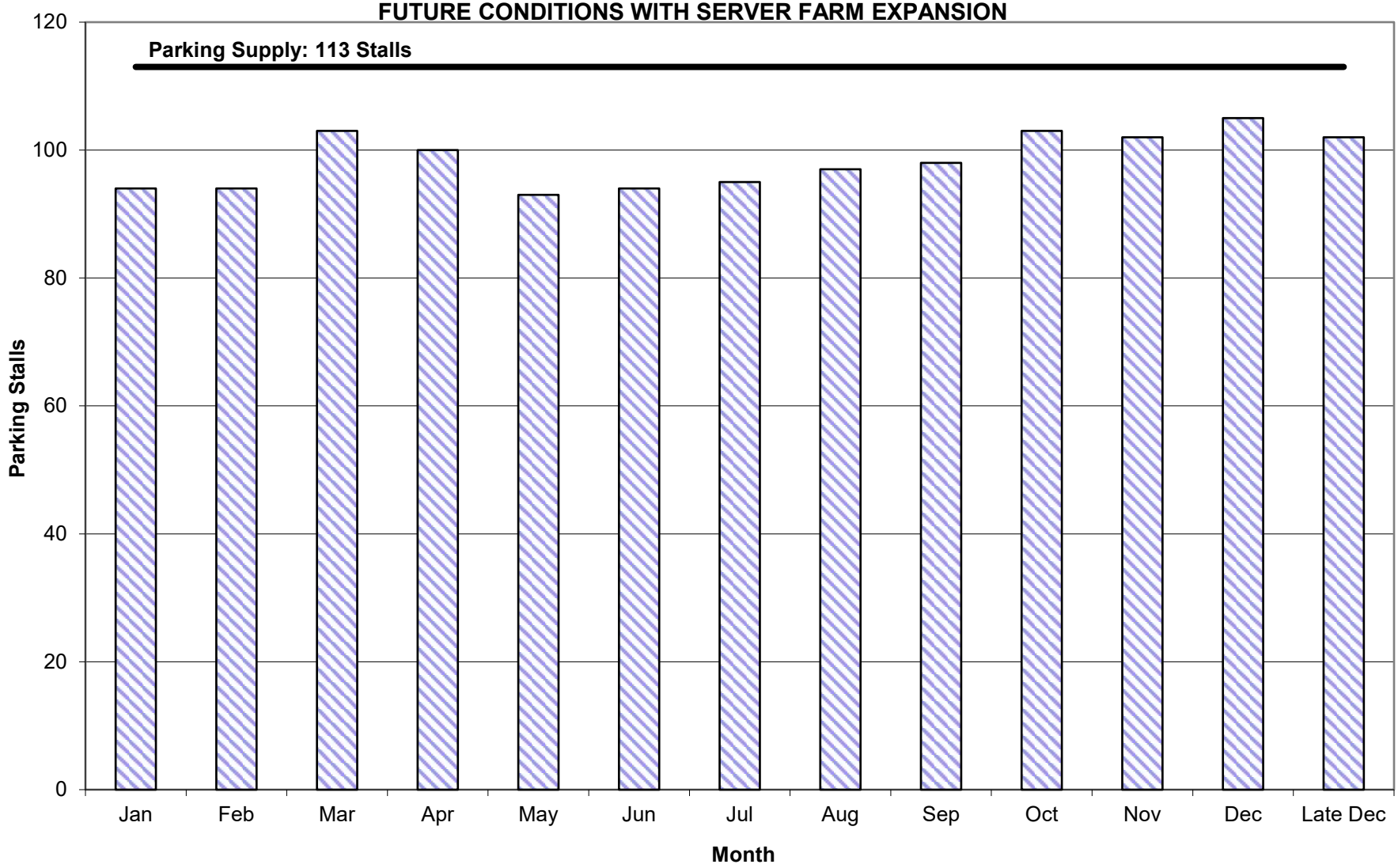

CHART 5
WEEKEND MONTH-BY-MONTH ESTIMATED PARKING DEMAND
FUTURE CONDITIONS WITH SERVER FARM EXPANSION

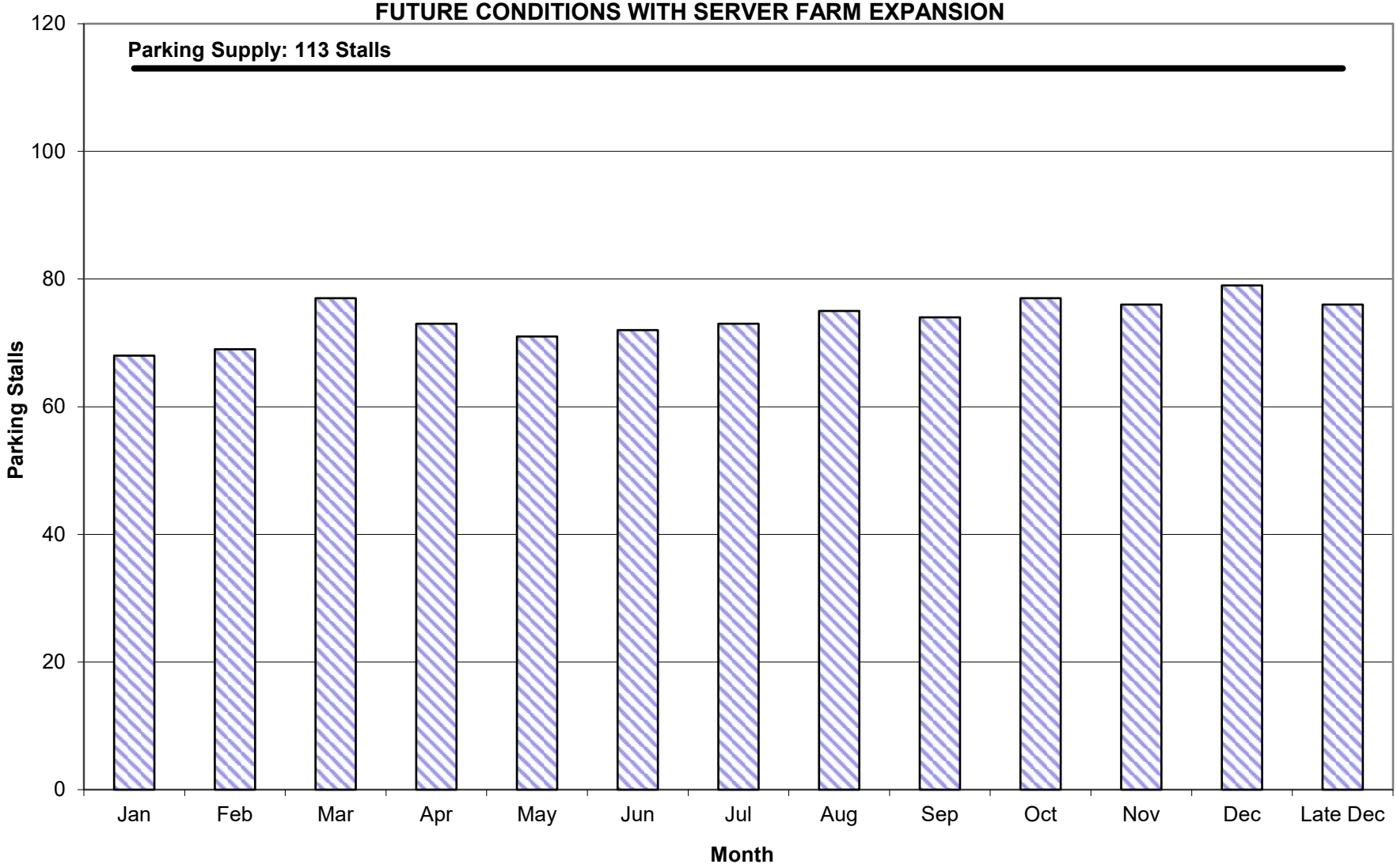

CHART 6
PEAK MONTH DAILY PARKING DEMAND BY HOUR
FUTURE CONDITIONS WITH SERVER FARM EXPANSION