



# ADDENDUM No. 1

## 670 Mesquit Project

Case Number: ENV-2017-249-EIR  
State Clearinghouse: 2017041071

**Project Location:** 606-694 S. Mesquit Street, 1494–1498 E. 6th Street, 2119–2135 E. 7th Street, Los Angeles, California 90021

**Community Plan Area:** Central City North

**Council District:** 14 – Kevin de León

**Project Description:** This document serves an Addendum to the Environmental Impact Report (EIR) prepared for the 670 Mesquit Project (Case No. ENV-2017-249-EIR, State Clearinghouse No. 2017011071), which was certified by the City of Los Angeles (City) on January 22, 2024 (Certified EIR). This Addendum analyzes proposed modifications to the preferred development alternative for the 670 Mesquit Project (Original Project), Alternative 2 (Reduced Retail and Increased Office with Charter School Alternative; Original Alternative 2). Specifically, modifications to the Original Alternative 2 under the Modified Alternative 2 include: 1) reducing office uses from 1,000,666 to 676,437 square feet (sf); 2) increasing the number of hotel guest rooms from 236 to 271 rooms; 3) increasing the number of residential units (including the requisite number of affordable units) from 420 to 895 units; 4) increasing retail floor area from 11,664 to 14,345 square feet (sf); 5) decreasing restaurant floor area from 59,700 to 28,688 sf; 6) reducing gallery space from 44,069 to 35,515 sf; 5) reducing gym floor area from 52,424 to 34,000 sf; 7) reducing the charter school floor area from 32,150 to 30,000 sf, but accommodating the same number of students; 8) reducing the publicly-accessible deck from 75,000 to 72,990 sf; and 7) reducing the number of buildings from five to four. Modified Alternative 2 proposes to construct a new mixed-use development totaling up to 1,792,103 sf of floor area on an approximately five-acre site, consisting of the following primary components, with up to: 676,437 sf of office; 271 hotel guest rooms; 895 multi-family residential housing units, including 45 units for Extremely Low Income households and 99 units for Very Low Income households; 14,345 sf of retail; 28,688 sf of restaurants; 35,515 sf of studio/event/gallery space; 34,000 sf of gym uses; and a 30,000 sf charter elementary school. The proposed uses would be accommodated in four new interconnected buildings, ranging in height from 84 feet to 378 feet, located above subterranean and podium parking. Modified Alternative 2 may involve the construction of a 72,990 sf publicly-accessible deck that would extend over a portion of the adjacent railway properties east of the Project Site, as well additional publicly accessible open space located along 7th Street. All existing buildings and uses, which include one- to four-story freezer, cold storage, and dry storage warehouses and surface parking, would be demolished.

**Prepared By**

Environmental Science  
Associates (ESA)

**PREPARED FOR**

The City of Los Angeles  
Department of City Planning

**Applicant**

RCS VE LLC

**November 2024**

# TABLE OF CONTENTS

---

	<u>Page</u>
<b>1 Introduction .....</b>	<b>1</b>
1.1 Background.....	1
1.2 CEQA Authority for an Addendum.....	2
<b>2 Project Description .....</b>	<b>4</b>
2.1 Project Summary .....	4
2.2 Environmental Setting.....	12
2.3 Requested Permits and Approvals .....	19
2.4 Responsible Public Agencies .....	20
<b>3 Environmental Impact Analysis.....</b>	<b>21</b>
3.1 Air Quality .....	24
3.2 Cultural Resources .....	28
3.3 Energy .....	35
3.4 Geology And Soils .....	37
3.5 Greenhouse Gas Emissions .....	40
3.6 Hazards And Hazardous Materials .....	43
3.7 Hydrology And Water Quality .....	48
3.8 Land Use And Planning .....	50
3.9 Noise.....	53
3.10 Population and Housing.....	60
3.11 Public Services .....	64
3.12 Transportation.....	71
3.13 Tribal Cultural Resources .....	76
3.14 Utilities and Service Systems .....	79
3.15 Addendum Conclusion.....	87

## List of Figures

Figure 1 Conceptual Site Plan – Modified Alternative 2 .....	6
Figure 2 West Elevation – Modified Alternative 2 .....	8
Figure 3 North Elevation – Modified Alternative 2 .....	9
Figure 4 East Elevation – Modified Alternative 2 .....	10
Figure 5 South Elevation – Modified Alternative 2 .....	11
Figure 6 Rendering – Aerial View of Modified Alternative 2 Looking Northwest .....	14
Figure 7 Rendering – Elevated View Looking East of Modified Alternative 2.....	15
Figure 8 Rendering – View Looking East from Jessie Street/Mesquit of Modified Alternative 2 .....	16
Figure 9 Rendering - Elevated View Looking North of Modified Alternative 2.....	17

**List of Tables**

Table 1 Comparison of Modified Alternative 2 to the Original Alternative 2 ..... 13  
Table 2 Estimate of Modified Alternative 2 Population..... 61  
Table 3 Estimate of Modified Alternative 2’s Employment ..... 62  
Table 4 Estimated Number of Students Generated Modified Alternative 2..... 67  
Table 5 Estimated Water Demand for Modified Alternative 2 ..... 81  
Table 6 Wastewater Generation for Modified Alternative 2..... 83  
Table 7 Estimated Operational Solid Waste Generation for Modified Alternative 2 ..... 85

**Attachments**

Attachment A Modified Alternative 2 Traffic Memorandum

# 1 INTRODUCTION

---

This document is an Addendum to the Environmental Impact Report (EIR) prepared for the 670 Mesquit Project (Case No. ENV-2017-249-EIR, State Clearinghouse No. 2017011071), which was certified by the City of Los Angeles (City) on January 22, 2024 (Certified EIR). In accordance with the California Environmental Quality Act (CEQA), this Addendum to the EIR analyzes proposed modifications (Modified Alternative 2) to the preferred development alternative (Original Alternative 2) of the 670 Mesquit Project (Original Project) and demonstrates that the proposed modifications to the Modified Alternative 2 do not meet the standards for a Supplemental or Subsequent EIR pursuant to Public Resources Code, Section 21166 or CEQA Guidelines Section 15162 and 15163.

## 1.1 BACKGROUND

The City of Los Angeles (the City) serving as the Lead Agency, prepared an Environmental Impact Report for the 670 Mesquit Project to assess potential environmental impacts of the Project, as described below.

The EIR concluded that, with the implementation of all feasible mitigation measures, all of the Project's environmental impacts would be less than significant with the exception of construction-related air quality and noise and vibration impacts, and significant and unavoidable transportation-related operation regional commercial vehicle miles travelled (VMT) and geometric hazards (freeway ramp queuing).

On January 22, 2024, the City certified the EIR and approved Alternative 2 of the EIR in conjunction with a Vesting Tentative Tract Map (VTTM) for the Project. Subsequent to approval of the VTTM for the Project, the Project Applicant has revised the Project (Modified Alternative 2).

Subsequent to the EIR's certification, the Project Applicant evaluated further ways in which the Project could reduce potential environmental impacts, further address the City's critical needs for housing and affordable housing, and increase publicly accessible open space. To achieve these goals, the Project Applicant proposes design modifications to the Original Alternative 2 (Modified Alternative 2). The primary differences between the Original Alternative 2 and Modified Alternative 2 occur as part of the changes to the mix of land uses within the buildings to increase the number of residential units and decrease non-residential uses, the elimination of Building 4 to increase the amount of ground level publicly available open space, and the reduction in the use of concrete in the building materials, which thereby reduces construction schedule length and number of concrete truck delivery trips and the associated emissions.

Both Alternative 2 (as analyzed in the Certified EIR) and the Modified Alternative 2 (analyzed in this Addendum) are discussed further below.

## 1.2 CEQA AUTHORITY FOR AN ADDENDUM

CEQA establishes the type of environmental documentation required when changes to a project occur after an EIR is certified. Specifically, Section 15164(a) of the CEQA Guidelines states that:

*The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.*

CEQA Guidelines Section 15162 requires the preparation of a Subsequent EIR when an EIR has been certified or a negative declaration has been adopted for a project and one or more of the following circumstances exist:

- (1) Substantial changes are proposed in the project which, will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
  - (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
  - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
  - (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
  - (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Likewise, California Public Resources Code (PRC) Section 21166 states that unless one or more of the following events occur, no Supplemental or Subsequent EIR shall be required by the lead agency or by any responsible agency:

- (a) Substantial changes are proposed in the project which will require major revisions of the environmental impact report;
- (b) Substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report; or
- (c) New information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available.

As demonstrated by the analysis in this document, the Modified Alternative 2 would not result in any new significant impacts, nor would it substantially increase the severity of previously identified significant impacts. Rather, all of the impacts associated with the Modified Alternative 2 are within the envelope of impacts addressed in the Certified EIR and do not constitute a new or substantially increased significant impact. Therefore, the modifications resulting from the Modified Alternative 2 do not meet the criteria for a Supplemental or Subsequent EIR pursuant to Public Resources Code, Section 21166 and CEQA Guidelines Section 15162 and 15163.

## 2 PROJECT DESCRIPTION

---

### 2.1 PROJECT SUMMARY

#### 2.1.1 Overview of Approved Project

The Original Project evaluated in the EIR proposed to construct a new mixed-use development totaling up to 1,792,103 square feet of floor area on approximately 5.45 acres located at 670 Mesquit Street (Project Site), within the Central City North Community Plan area of the City of Los Angeles. The Original Project would have a floor area ratio (FAR) of up to 7.5:1<sup>1</sup>, and would consist of the following primary components: office space totaling up to 994,055 square feet; 308 multi-family residential housing units including affordable units in compliance with Measure JJJ; a 236-room hotel; Central Market (food hall), a grocery store, and general retail uses totaling up to 136,152 square feet; restaurants totaling up to 89,577 square feet; studio/event/gallery space and a potential museum totaling up to 93,617 square feet; and a maximum 62,148-square-foot gym. The proposed uses would be accommodated in five new interconnected buildings above subterranean and podium parking that would range in height from 84 feet to 378 feet. The Original Project would provide parking for a total of up to 3,500 vehicles. In addition, the Original Project was evaluated to include a potential Deck Concept (Original Project with the Deck Concept) that would involve construction of a 132,000 square foot Deck that would extend over a portion of the freight and passenger rail lines and rail yards (Railway Properties) east of the Project Site. Existing one- to four-story freezer, cold storage, and dry storage warehouses and surface parking would be demolished to accommodate development of the Original Project.

The Draft EIR evaluated Alternative 2 (Reduced Retail and Increased Office with Charter School Alternative). Alternative 2, henceforth referred to as Original Alternative 2, proposed to construct a new mixed-use development totaling up to 1,792,103 square feet of floor area (same as the Original Project) on the Project Site. As with the Original Project, the Original Alternative 2 would have the same amount of floor area and an FAR of 7.99:1, consistent with the approved Vesting Tentative Tract Map (VTTM) No. 74765. Original Alternative 2 would consist of the following primary components: office space totaling up to 1,000,666 square feet; a 236-room hotel with 209,560 square feet of floor area; 420 multi-family residential housing units including affordable units in compliance with Measure JJJ; retail uses totaling up to 11,664 square feet of floor area, restaurant uses totaling up to 59,700 square feet of floor area, studio/event/gallery space totaling up to 44,069 square feet of floor area, up to 52,424 square feet of gym floor area, and a charter elementary school that would consist of 32,150 square feet of floor area,. Similar to the Original Project, the proposed uses in the Original Alternative 2 would be accommodated in five new interconnected buildings above subterranean and podium parking that would range in height from 84 feet to 378 feet. As with the Project, the Original Alternative 2 would provide parking for a total of up to 3,500 vehicles. The Original Alternative 2 would involve construction of a 75,000 square foot Deck that would extend over a portion of the Railway Properties east of the Project Site, a reduction of 57,000 square feet as compared to the Original Project with the Deck Concept. As

---

<sup>1</sup> The Original Project FAR was based on the site area as described in the initially-submitted Vesting Tentative Tract Map (VTTM). The Deputy Advisory Agency ultimately approved a version of the VTTM that reflected a slightly-reduced total area, resulting from changes to the proposed dedications. As a result, the Original Project FAR, when using the approved VTTM's site area, was 7.99:1.

with the Original Project, the existing one- to four-story freezer, cold storage, and dry storage warehouses and surface parking would be demolished.

On January 22, 2024, the Deputy Advisory Agency certified the EIR and adopted the Original Alternative 2 as the preferred development alternative.

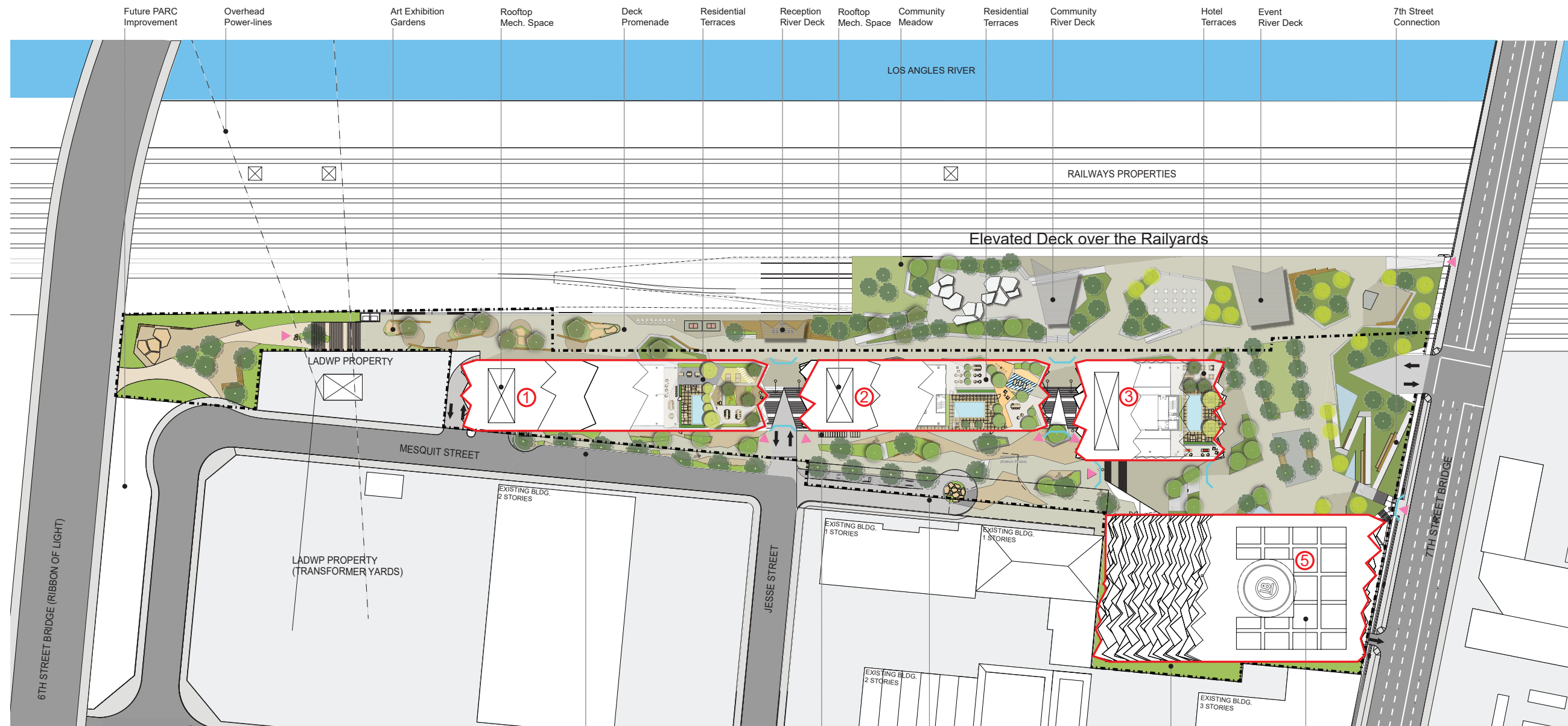
### 2.1.2 Modifications to Approved Project (Original Alternative 2)

Under Modified Alternative 2, the configuration, massing, and organization of the development remains generally the same as the Original Alternative 2. The overall square footage of floor area does not change. Similar to Original Alternative 2, Modified Alternative 2 would include a Deck Concept with a size of 72,990 square feet. This deck would now be supplemented by additional publicly accessible open space located along 7th Street at the prior location of Building 4. **Figure 1, Conceptual Site Plan – Modified Alternative 2**, provides the conceptual site plan for Modified Alternative 2. The Modified Alternative 2 would result in the development of four buildings, as opposed to five buildings under Original Alternative 2. Under Modified Alternative 2, Building 4 of the Original Alternative 2 would be removed. However, the numbering of buildings from the Original Alternative 2 is being maintained in Modified Alternative 2 for ease of comparative purposes. As such, under Modified Alternative 2, there is no Building 4 even though there is a Building 5. Outdoor programming would remain the same under the Original Alternative 2 and would include the weekly farmers' market, group exercise classes, and busking.

Compared to the Original Alternative 2, the number of hotel rooms would increase by 35 rooms from 236 to 271 rooms, but with a decrease in floor area by 9,350 square feet, from 209,560 square feet of floor area under Original Alternative 2, to 200,210 square feet. Additionally, the residential unit count would increase by 475 units, from 420 to 895. Subsequently, the number of affordable units would increase from 68 to 144, representing 16 percent of total units, as with the Original Project. Office uses would be reduced by 324,229 square feet from 1,000,666 square feet to 676,437 square feet. Additional minor square footage changes to proposed uses are as follows:

1. **Charter School:** Modified Alternative 2 would reduce charter school floor area by 2,150 square feet from 32,150 square feet under the Original Alternative 2 to 30,000 square feet. Modified Alternative 2 would continue to accommodate the same number of students, approximately 300 K-5 students, as the Original Alternative 2.
2. **Retail:** Modified Alternative 2 would increase the retail floor area by 2,681 square feet from 11,664 square feet under the Original Alternative 2, which includes general retail, grocery, and food hall, to 14,345 square feet of general retail.
3. **Restaurant:** Modified Alternative 2 would reduce the restaurant floor area by 31,012 square feet from 59,700 square feet under the Original Alternative 2 to 28,688 square feet.
4. **Gallery:** Modified Alternative 2 would reduce the space available for the studio/event/gallery/potential museum by 8,554 square feet of floor area from 44,069 square feet of floor area under the Original Alternative 2 to 35,515 square feet of floor area.





**① BUILDING 1**  
 Use: Residential /Retail/ Restaurant  
 Height: 378ft Roof, 388ft max MEP screen  
 Floor Area: 540,311sf

**② BUILDING 2**  
 Use: Residential /Retail/ Restaurant  
 Height: 294ft Roof, 314ft max MEP screen  
 Floor Area: 295,331sf

**③ BUILDING 3**  
 Use: Hotel  
 Height: 210ft Roof, 230ft max MEP screen  
 Floor Area: 202,033sf

**⑤ BUILDING 2**  
 Use: Residential /Retail/ Restaurant  
 Height: 378ft Roof, 388ft max MEP screen  
 Floor Area: 754,428sf

- ▲ Pedestrian Access
- ← Vehicular Access
- ⚡ View Corridor
- ★ Bicycle Parking



5. **Gym:** The Modified Alternative 2 would reduce the gym by 18,424 square feet of floor area from 52,424 square feet of floor area under the Original Alternative 2 to 34,000 square feet of floor area.

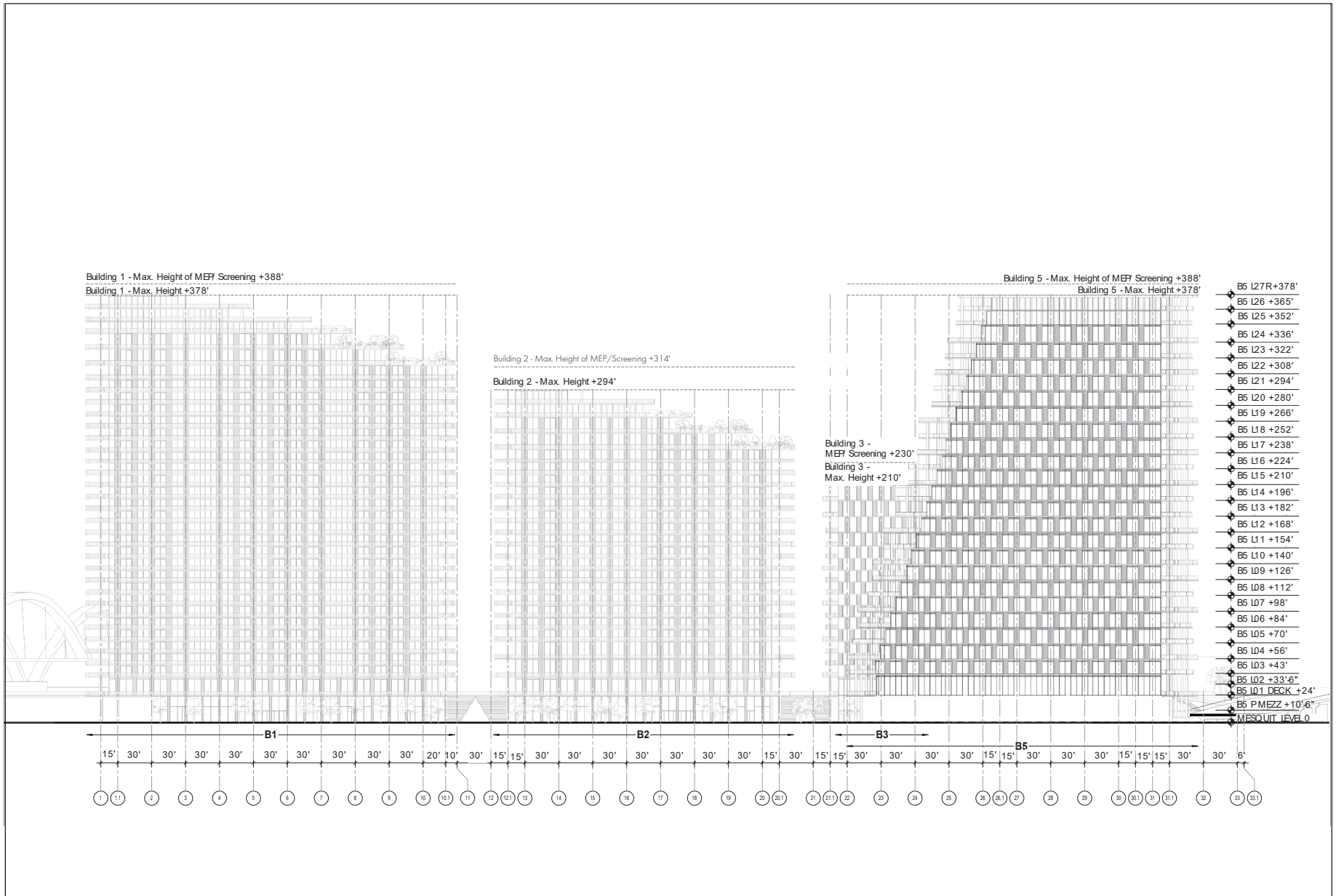
In sum, the total developed floor area on the Project Site would remain at 1,792,103 square feet as under the Original Alternative 2. As such, FAR would continue to be 7.99:1 as under the Original Project and Original Alternative 2.

No change is proposed to the number of parking spaces provided. Modified Alternative 2 would provide a minimum of 2,000 traditional vehicle parking spaces, with parking for up to 3,500 vehicles using a combination of automated parking systems, valet parking, or other efficiency parking methods. Parking would continue to be provided in a six-level, below- and above-grade structured parking spanning the Project Site.

As with the Original Alternative 2, a rooftop heliport would be located on Building 5 for emergencies and occasional private use. **Figure 2, West Elevation - Modified Alternative 2**, depicts the relative heights of the buildings under the Modified Alternative 2, with Building 5 located on the far right. **Figure 3, North Elevation - Modified Alternative 2**, provides an elevation from the north. **Figure 4, East Elevation - Modified Alternative 2**, provides an elevation from the east with Building 1 on the far right. **Figure 5, South Elevation - Modified Alternative 2**, provides an elevation from the south.

As with the Original Alternative 2, the residential pick-up and drop-off location would be in front of Building 1 on Mesquit Street, the hotel lobby, and the office pick-up and drop-off location would be in front of Building 2, on the Mesquit Paseo open space, and the Hotel lobby pedestrian access to Building 3 would be provided from Mesquit and from 7th Street. Additional office, Hotel and event space pick-up and drop-off would be provided from two off-street driveways on 7th Street at Building 5. Access from 7th Street would be improved because it would immediately go underground to create expanded public open space in addition to the deck on Level 3 (the deck level).

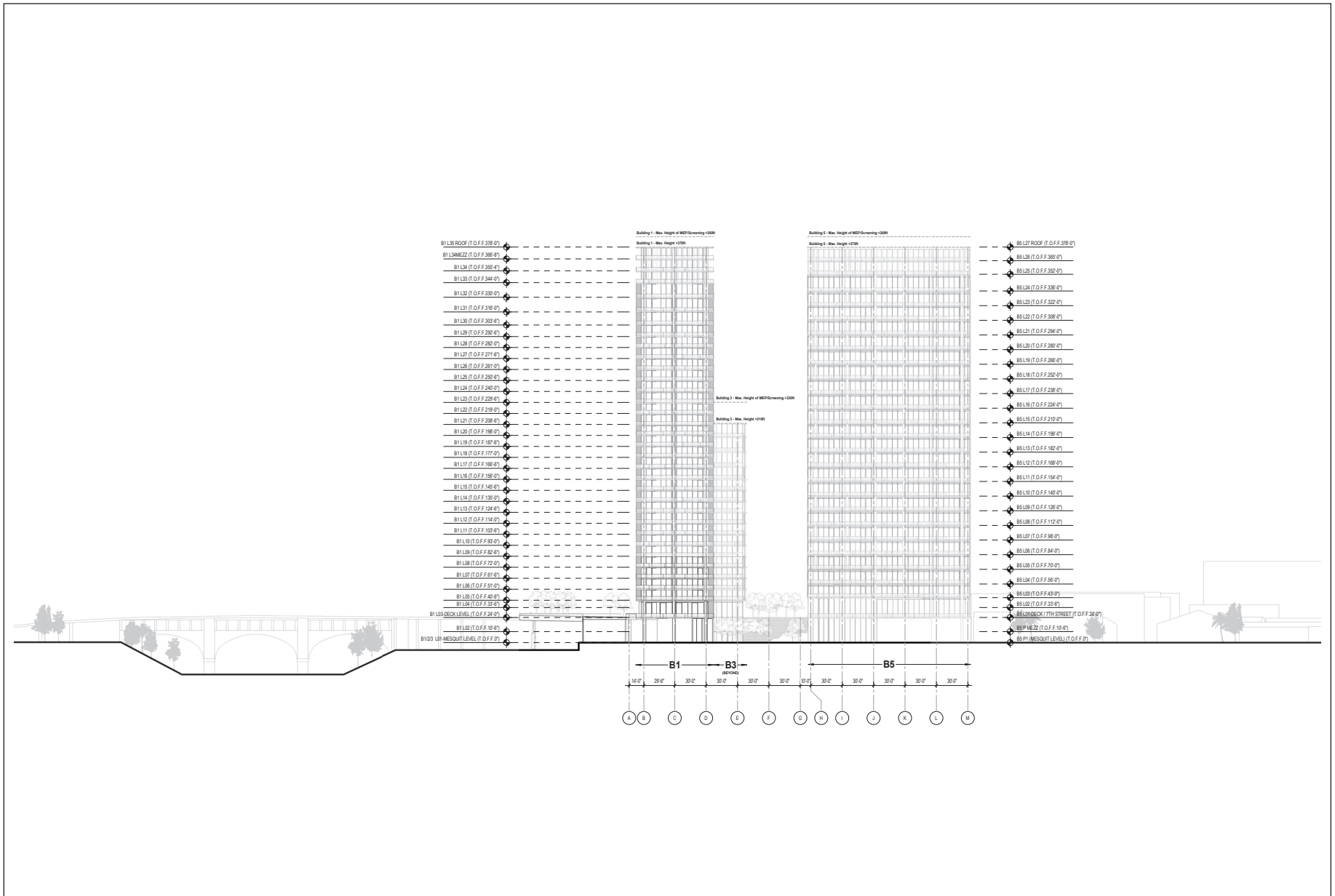
Per Los Angeles Municipal Code (LAMC) Section 12.21.G, Modified Alternative 2 would provide 89,725 square feet of required open space. An additional 94,275 square feet of open space would be provided by the Project for a total of 184,000 square feet. Under Modified Alternative 2, total rooftop open space would see a net decrease of 29,519 square feet from 45,014 square feet under the Original Alternative 2 to a total of 15,495 square feet to account for mechanical penthouses. Under Modified Alternative 2, open space at the ground level and deck level would increase by 380 square feet from 168,125 square feet to 168,505 square feet. Under Modified Alternative 2, a new 35,000 square foot plaza would take the place of Building 4 and on-site circulation along 7<sup>th</sup> Street. Overall, the reduction in rooftop open space and addition of ground level and deck open space would result in a net decrease of 29,139 square feet from 213,139 square feet under the Original Alternative 2 to 184,000 square feet under Modified Alternative 2.



SOURCE: Gruen Associates with Bjarke Ingels Group, 2024

670 Mesquit

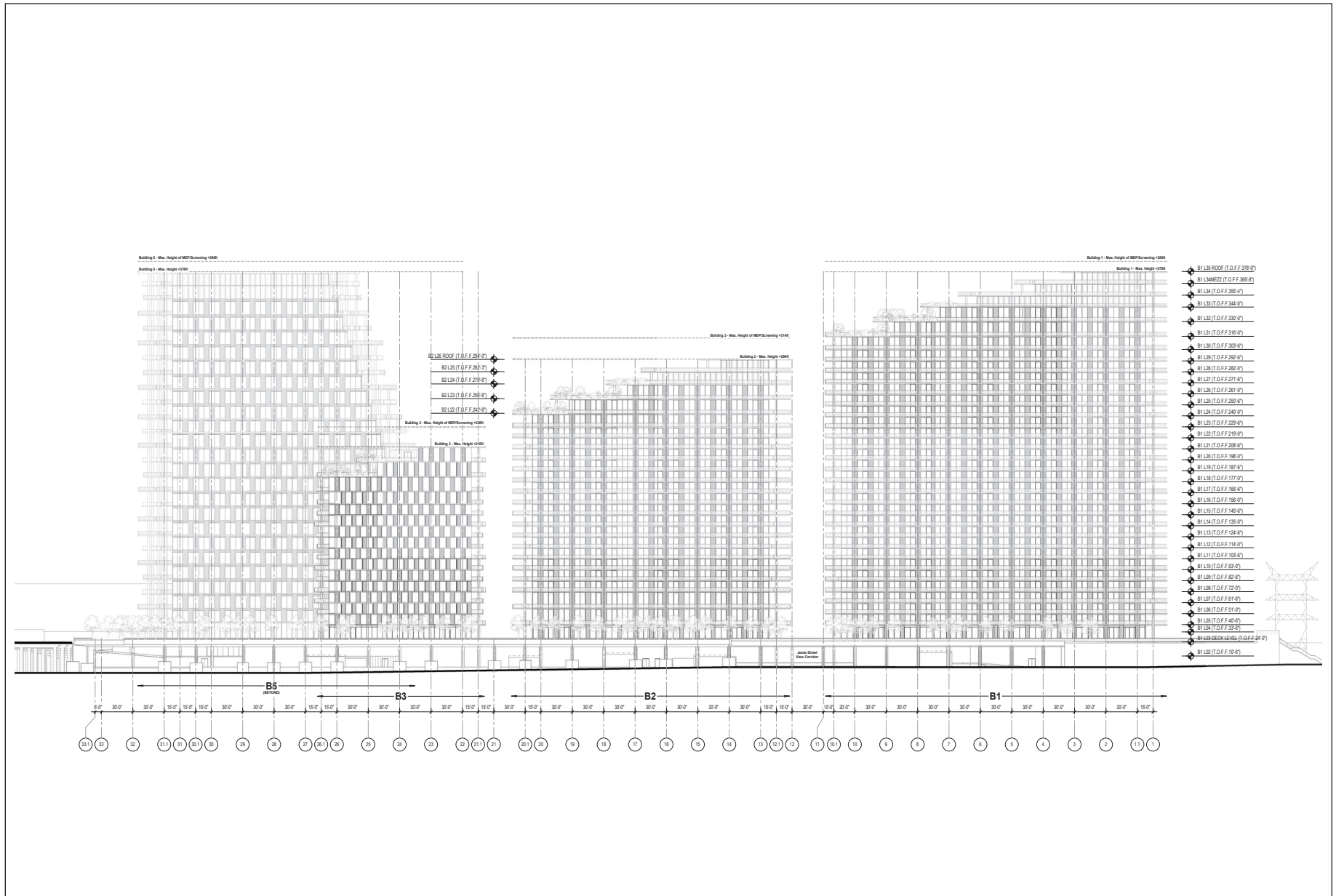
**Figure 2**  
 West Elevation – Modified Alternative 2



SOURCE: Bjarke Ingels Group with Gruen Associates, 2024

670 Mesquit

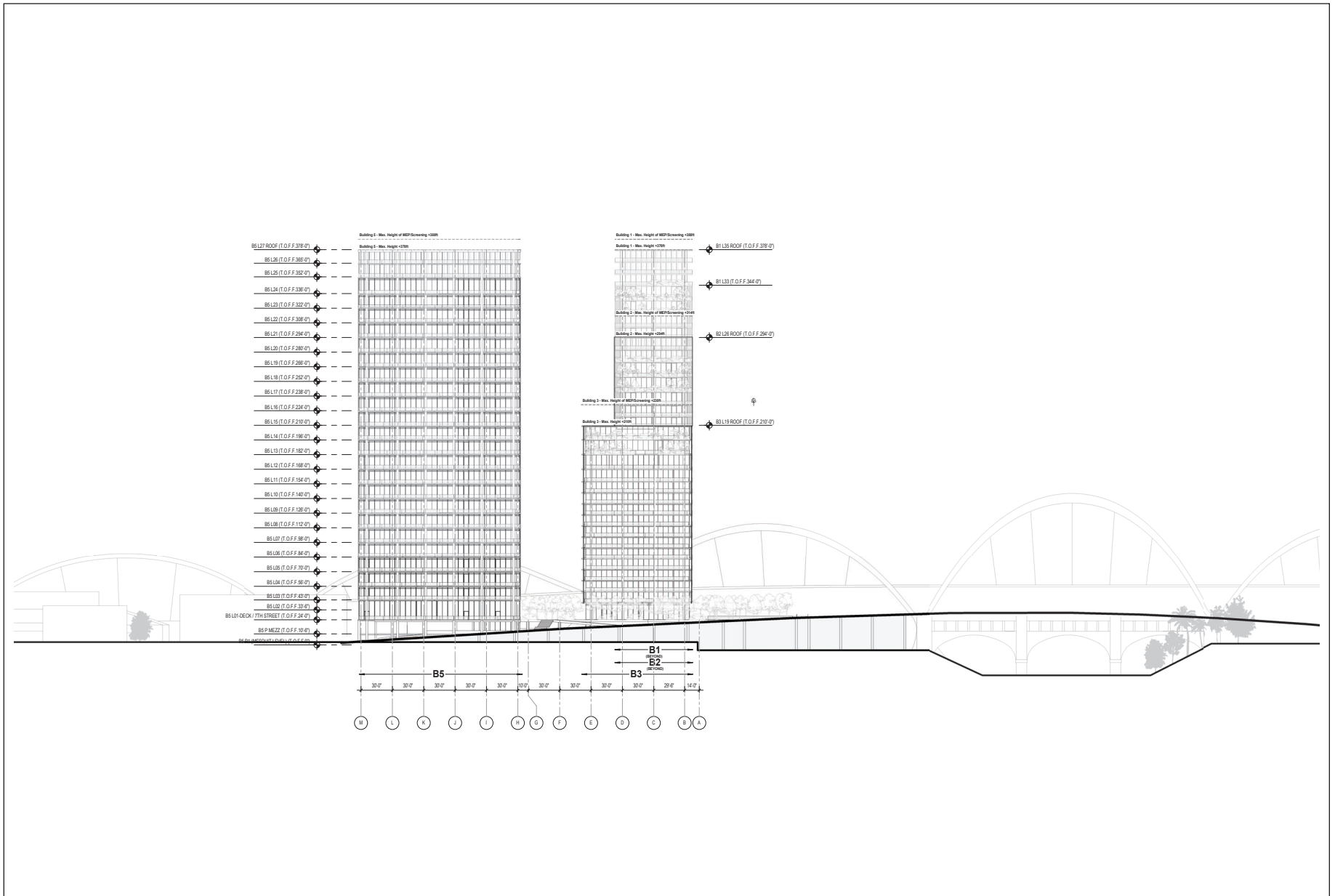
**Figure 3**  
North Elevation – Modified Alternative 2



SOURCE: Bjarke Ingels Group with Gruen Associates, 2024

670 Mesquit

**Figure 4**  
East Elevation – Modified Alternative 2



SOURCE: Bjarke Ingels Group with Gruen Associates, 2024

670 Mesquit

**Figure 5**  
South Elevation – Modified Alternative 2

As with the Original Alternative 2, the proposed open space features include at-grade landscaped areas, pedestrian passageways, walkways, balconies offering views of the Los Angeles River, and above-grade landscaped terraces. The Northern Landscaped Area, Elevated Pedestrian Walkway, North and South River Balconies, Mesquit Paseo, Office Terraces, Building 1, Building 3 and Building 5 roof decks would all remain the same.

The components of Modified Alternative 2 are compared to those of the Original Alternative 2 in **Table 1**, *Comparison of Modified Alternative 2 to the Original Alternative 2*. **Figure 6**, *Rendering – Aerial View of Modified Alternative 2 Looking Northwest*, provides a rendering of the Modified Alternative 2 from a northwesterly perspective. **Figure 7**, *Rendering – Elevated View Looking East of Modified Alternative 2*, provides a rendering of Modified Alternative 2 from the east. **Figure 8**, *Rendering – View Looking East from Jessie Street/Mesquit of Modified Alternative 2*, provides a rendering looking easterly from the street level between Buildings 1 and 2. **Figure 9**, *Rendering - Elevated View Looking North of Modified Alternative 2*, provides a rendering of the outdoor rooftop space on Building 3 and the upper levels of Buildings 1 and 2.

As shown in the renderings, Modified Alternative 2 is comprised of four buildings, each designed with terraces that step down from the north towards the 7th Street Bridge in the south. The concrete framing of the Original Project and Original Alternative 2 has been removed from the architectural design of Modified Alternative 2. As a result, Modified Alternative 2 would have substantially less concrete needed to construct the buildings and consequentially fewer concrete trucks needed than the Original Alternative 2, thereby shortening the building phase of construction by approximately four months compared to the Original Alternative 2. The removal of the concrete framing would reduce the amount of concrete as part of the overall building construction by approximately 22,222 cubic yards of concrete (or 600,000 cubic feet of concrete), which equates to 2,615 fewer concrete delivery trucks trips to the Project Site.

## 2.2 ENVIRONMENTAL SETTING

### 2.2.1 Project Location

The Project Site is located within the boundaries of the Central City North Community Plan (Community Plan) area and is located along the southeastern edge of the Artists-in-Residence District of Downtown Los Angeles, as defined in the Central City North Community Plan. The Project Site is located at 606-694 S. Mesquit Street, 1494–1498 E. 6th Street, 2119–2135 E. 7th Street, Los Angeles, California 90021. The Project Site flanks Mesquit Street on the east and west between the former 6<sup>th</sup> Street Viaduct right-of-way (ROW) on the north and the 7<sup>th</sup> Street Bridge on the south. The majority of the Project Site is on the east side of Mesquit Street, with additional parcels in the southern portion of the Project Site located on the west side of Mesquit Street at 7th Street.

**TABLE 1  
COMPARISON OF MODIFIED ALTERNATIVE 2 TO THE ORIGINAL ALTERNATIVE 2**

<b>Component</b>	<b>Original Alternative 2</b>	<b>Modified Alternative 2</b>	<b>Difference between Original Alt 2 and Modified Alternative 2</b>
Office	1,000,666 sf	676,437 sf	-324,229 sf
Hotel (236 rooms)	236 rms 209,560 sf	271 rms 200,210 sf	+35 rms -9,350 sf
Residential Dwelling Units	420 du	895 du	+475 du
Retail	11,664 sf	14,345 sf	-2,681 sf
Restaurant	59,700 sf	28,688 sf	-31,012 sf
Studio/Event/Gallery/Potential Museum	44,069 sf	35,515 sf	-8,554 sf
Gym	52,424 sf	34,000 sf	-18,424 sf
Elementary School	300 students 32,150 sf	300 students 30,000 sf	Same students -2,150 sf
<b>Total Developed Floor Area</b>	<b>1,792,103 sf</b>	<b>1,792,103 sf</b>	<b>—</b>
FAR	7.99:1	7.99:1	<b>—</b>
Provided Open Space without Deck	138,139 sf	111,010 sf	-27,129 sf
Open Space with the Deck	213,139 sf	184,000 sf	-29,139 sf
Deck & Capacity @ 1 person per 15 sf	75,000 sf/ 5,000 ppl	72,990 sf/ 4,866 ppl	-2,010 sf/ -134 ppl
Vehicle Parking	Up to 3,500	Up to 3,500	<b>—</b>

SOURCE: ESA, 2024

The Los Angeles Department of Water and Power (LADWP) owns property on both sides of Mesquit Street (LADWP Property) near the Project Site. LADWP's River Switching Station electricity substation is north of the Project Site on the west side of Mesquit Street with an associated electrical tower and a transmission line ROW that crosses the Los Angeles River, bisecting the Project Site on the east side of Mesquit Street.

### 2.2.2 Existing Conditions

The Project Site is currently developed with existing one- to four-story freezer, cold storage, and dry storage warehouses with associated office space, loading docks, and surface parking. The existing warehouses, which date from approximately 1908 through 2003, range from approximately 22 to 61 feet in height and total approximately 205,393 gross square feet of floor area. The primary business, Rancho Cold Storage, has operated on-site for more than 30 years. Other on-site businesses include Hidden Villa Ranch, Integrated Food Service, and Harvey's Produce. Approximately 66 persons are currently employed on-site.





SOURCE: Bjarke Ingels Group with Gruen Associates, 2024

670 Mesquit

**Figure 6**  
Rendering – Aerial View of Modified Alternative 2 Looking Northwest



SOURCE: Bjarke Ingels Group with Gruen Associates, 2024

670 Mesquit

**Figure 7**  
Rendering – Elevated View Looking East of Modified Alternative 2



SOURCE: Bjarke Ingels Group with Gruen Associates, 2024

670 Mesquit

**Figure 8**  
Rendering– View Looking East from Jesse Street/Mesquit Street of Modified Alternative 2



SOURCE: Bjarke Ingels Group with Gruen Associates, 2024

670 Mesquit

**Figure 9**  
Rendering - Elevated View Looking North of Modified Alternative 2

The City's Bureau of Engineering and the Applicant entered into an easement agreement for the City's use of portions of the northern end of the Project Site. As depicted in Figure II-5, City and Amtrak Easements, the Applicant granted the City a Viaduct Easement, Maintenance Access Easement, and Street Easement in connection with the Ribbon of Light Bridge. Landscaping would be provided in easement areas at the ground level, would comply with all conditions of the easements, and would be designed to complement the future PARC Improvements. The Applicant also has an easement agreement with Amtrak for maintenance purposes that begins north of the LADWP property and wraps southward around the eastern property line.

### **2.2.3 Surrounding Land Uses**

The Project Site is bordered on the east by freight and passenger rail lines and rail yards (Railway Properties) owned by National Railroad Passenger Corporation (Amtrak), BNSF Railway Company (BNSF), and the Los Angeles County Metropolitan Transportation Authority (Metro). The Los Angeles River is located east of the Railway Properties with the Boyle Heights community further to the east across the Los Angeles River.

North of the Project Site is the recently completed Sixth Street Viaduct Replacement project site, the centerpiece of which is a new multi-modal bridge known as the Ribbon of Light Bridge. The Sixth Street Viaduct Replacement project, which was led by the City's Bureau of Engineering and held its grand opening in July 2022, also includes an approximately 12-acre area with open space and recreational amenities, known as the Sixth Street Park, Arts, River, and Connectivity (PARC) Improvements. The PARC improvements are currently being constructed under and adjacent to the Ribbon of Light Bridge with access ramps and stairs connecting to the bridge, and are intended to be completed prior to completion of the Project. Metro owns several vacant parcels north of 6th Street. Land uses north and northwest of the new bridge site include a mix of restaurants, bars and cafes, commercial uses, and creative and traditional office space.

The elevated 7th Street Bridge forms the southern boundary of the Project Site. The 7th Street Bridge provides access between the Arts District and greater Downtown area and Boyle Heights, east of the Los Angeles River. The 7th Street Bridge is listed on the California Register and is a City-designated Historical Cultural Monument (HCM No. 904). It does not currently provide access to the Project Site. The area south of the 7th Street Bridge comprises a mix of uses in converted industrial and other buildings, including live/work spaces and restaurants and coffee shops. There are warehouses and light manufacturing uses located throughout this area as well.

The west side of Mesquit Street, adjacent to the Project Site, is developed with warehouses and an under-construction office building at the northwest corner of the intersection of Jesse Street and Mesquit Street (640 S. Santa Fe Avenue), in addition to the LADWP Property. Other land uses to the west include existing office space; restaurants; and commercial uses; the newly constructed AMP Lofts live/work and commercial development, the recently completed adaptive reuse of the Ford Motor Factory located a block from the Project Site to house Warner Music Group's new corporate campus, which includes office space, recording studios, and performance

spaces; and various low-rise industrial and warehouse uses similar to those on the Project Site. A three-story multi-family residential building (Artist Lofts DTLA at 688 S. Santa Fe Avenue) occupies the northeast corner of S Santa Fe Avenue and 7th Street and directly abuts the Project Site.

## 2.3 REQUESTED PERMITS AND APPROVALS

The discretionary entitlements, reviews, permits and approvals required to implement the Modified Alternative 2 are being modified from the Original Project and Original Alternative 2, and include, but are not necessarily limited to, the following:

1. Pursuant to **Charter Section 555 and Los Angeles Municipal Code (LAMC) Section 11.5.6**, a **General Plan Amendment** to the Central City North Community Plan and Mobility Plan 2035 to change:
  - a. The land use designation for the Project Site from Heavy Industrial to Regional Center Commercial; and
  - b. The street designation for Mesquit Street adjacent to the Project Site between 6th Street and 7th Street from Collector Street to a Local Limited Street.
2. Pursuant to **LAMC Sections 13B.1.4**, a **Vesting Zone and Height District Change** from M3-1-RIO to C2-2-RIO, and pursuant to **LAMC Section 11.5.11(e)**, the following Developer Incentives to permit:
  - a. An FAR of 8:1 in lieu of 6:1; and
  - b. A zero-foot setbacks on the rear yard; and
  - c. FAR averaging in a unified development.
3. Pursuant to **LAMC Section 12.24.W.1**, a **Main Conditional Use Permit** for the on-site and off-site sale of a full line of alcoholic beverages at eleven establishments.
4. Pursuant to **LAMC Section 12.24 W.23**, a **Conditional Use Permit** for a heliport incidental to office building or residential use.
5. Pursuant to **LAMC Section 13B.5.3**, a **Variance** from LAMC Section 12.21 A.5 to permit drive aisles of 24 feet in width in lieu of the standards outlined in Section 12.21 A.5(b).
6. Pursuant to **LAMC Section 16.05**, a **Site Plan Review** to permit construction of more than 50,000 square feet of nonresidential floor area and more than 50 residential dwelling units.
7. Pursuant to **LAMC Section 13.17 G.3(a)**, an **Exception** from the exterior site lighting standards for the River Implementation Overlay (RIO) District to allow a maximum initial luminance value no greater than 0.50 horizontal and vertical foot candles at the site boundary in lieu of 0.20 horizontal and vertical foot candles at the site boundary and allow

greater than 0.01 horizontal foot candles 15 feet beyond the site as required by LAMC Section 13.17 F.3.

8. Pursuant to **LAMC Section 13.11**, the establishment of a Sign District (“-SN”) Supplemental Use District) to regulate signage within the Project Site.

## **2.4 RESPONSIBLE PUBLIC AGENCIES**

A Responsible Agency under CEQA is a public agency with some discretionary authority over a project or a portion of it, but which has not been designated the Lead Agency (State CEQA Guidelines Section 15381). No responsible agencies have been identified for the Project.

### 3 ENVIRONMENTAL IMPACT ANALYSIS

---

This section provides an impact assessment of the Modified Alternative 2 (Modified Project). The information below addresses each of the environmental issues that were previously analyzed within the scope of the previously adopted EIR for Original Alternative 2 (Approved Project) and the most current Appendix G of the CEQA Guidelines. The conclusions of the previously adopted EIR are provided as a reference for each environmental issue area for purpose of describing how the proposed changes would not result in any new significant impacts and would not increase the severity of the significant impacts identified in the EIR.

This Addendum focuses on changes from the Approved Project to the Modified Project that would potentially affect the following impact areas: air quality, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, public services, transportation, tribal cultural resources, and utilities and service systems.

The Project's Initial Study included in Appendix A of the Draft EIR found that the Original Project's impacts related to aesthetics, agriculture, biological resources, mineral resources and wildfire would be less than significant or have no impact.

With regard to aesthetics impacts, Senate Bill (SB) 743 [Public Resources Code (PRC) §21099(d)] sets guidelines for evaluating project transportation impacts under CEQA, as follows: "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment." The related City of Los Angeles Department of City Planning Zoning Information (ZI) No. 2452 provides further instruction concerning the definition of transit priority projects and that "visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA." PRC Section 21099 and ZI No. 2452 apply to the Project. Therefore, the Project would not have significant aesthetic impacts.

As the Project Site is void of any agricultural resources, is located in an urbanized area with no natural vegetation, and would comply with regulatory requirements for potential biological resources, Modified Alternative 2 as with the Original Alternative 2 and Original Project, would have no impacts related to agricultural resources, biological resources, or wildfire hazards.

In addition, the Initial Study found that the Original Project's impacts regarding mineral resources would be less than significant. As with the Original Project, both the Original Alternative 2 and the Modified Alternative 2 would not include any oil wells, and no change in oil extraction would occur compared to existing and past conditions on the Project Site. Access to oil within the greater Union Station Oil Field would not be precluded by development under the Project, nor the Original Alternative 2 or Modified Alternative 2. It is also acknowledged that with implementation of new methodologies, such as slant drilling, oil extraction capabilities and exploratory operations below developed parcels, such as the Project Site, would not be substantially reduced by development



of the of the Project Site. Therefore, implementation of either the Project, the Original Alternative 2, or Modified Alternative 2 would not result in the loss of availability of a known mineral resource of value to the region and residents of the state, nor of a locally important mineral resource recovery site. Similar less than significant impacts to mineral resources would occur under any of these development scenarios.

A Modified Environmental Checklist Form was used to compare the anticipated environmental effects of the Modified Project with those disclosed in the Certified EIR and to review whether any of the conditions set forth in CEQA Guidelines Section 15162 and PRC Section 21166, requiring preparation of a Supplemental or Subsequent EIR, have been triggered.

The checklist and evaluation below provides the following information for each of these environmental impact categories:

**1 IMPACT DETERMINATION IN THE CERTIFIED EIR**

This section lists the impact determination made in the Certified EIR for each impact category.

**2 DO PROPOSED CHANGES INVOLVE NEW SIGNIFICANT IMPACTS OR SUBSTANTIALLY MORE SEVERE IMPACTS?**

Pursuant to CEQA Guidelines Section 15162(a)(1), this section indicates whether the Modified Project would result in new significant impacts that have not already been considered and mitigated by the prior environmental review or would result in a substantial increase in the severity of a previously identified impact.

**3 ANY NEW CIRCUMSTANCES INVOLVING NEW IMPACTS OR SUBSTANTIALLY MORE SEVERE IMPACTS?**

Pursuant to CEQA Guidelines Section 15162(a)(2), this section indicates whether there have been changes to the Project Site or the vicinity (circumstances under which the project is undertaken) which have occurred subsequent to the prior environmental documents, which would result in the Modified Project having new significant environmental impacts that were not considered in the prior environmental documents or that substantially increase the severity of a previously identified impact.

**4 ANY NEW INFORMATION REQUIRING NEW ANALYSIS OR VERIFICATION?**

Pursuant to CEQA Guidelines Section 15162(a)(3)(A-D) , this section indicates whether new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the previous environmental documents were certified as complete is available, requiring an update to the analysis of the previous environmental documents to verify that the environmental conclusions and mitigations remain valid. If the new information shows that:

- (A) The project will have one or more significant effects not discussed in the prior environmental documents;

- (B) Significant effects previously examined will be substantially more severe than shown in the prior environmental documents;
- (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
- (D) Mitigation measures or alternatives which are considerably different from those analyzed in the prior environmental documents would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative;

then the question would be answered “Yes”, requiring the preparation of a Supplemental or Subsequent EIR. However, if the additional analysis completed as part of this environmental review finds that the conclusions of the prior environmental documents remain unchanged and no new significant impacts are identified, or identified environmental impacts are not found to be more severe, or there are no additional mitigation measures or alternatives now available or feasible but declined for adoption by the project proponent, then the question would be answered “No” and no Supplemental or Subsequent EIR is required. New studies completed as part of this environmental review are attached to this Addendum, or are on file with the Planning Department.

## 5 MITIGATION MEASURES ADDRESSING IMPACTS

Pursuant to CEQA Guidelines Section 15162(a)(3), this section indicates whether the prior environmental document provides project design features (PDFs) or mitigation measures to address effects in the related impact category. If so, a “Yes” response will be provided. In some cases, the previously adopted PDFs or mitigation measures have already been implemented or are not applicable to the Modified Project, or a significant impact was not identified, and mitigation was not required. In either instance, a “No” response will be indicated. References to the “Project” within the mitigation measures listed below shall also apply to Modified Alternative 2.

## 6 CONCLUSION

For each environmental topic, a discussion of the conclusion relating to the analysis is provided.

### 3.1 AIR QUALITY

Thresholds (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
<b>AIR QUALITY:</b> Would the project:					
(a) Conflict with or obstruct implementation of the applicable air quality plan?	Less than Significant	No	No	Yes	No
(b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	Significant and Unavoidable	No	No	Yes	Yes
(c) Expose sensitive receptors to substantial pollutant concentrations?	Less than Significant with Mitigation	No	No	Yes	Yes
(d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	Less than Significant	No	No	Yes	No

#### 3.1.1 Impact Determination in the EIR

With regards to thresholds (a) and (d), the EIR concluded that impacts regarding conflicts with an applicable air quality management plan and odors would be less than significant for the Original Project and the Original Alternative 2. The EIR concluded that both the Original Project and the Original Alternative 2 under threshold (b) would have a significant and unavoidable impact due to daily regional construction-related Nox emissions and daily operational VOC emissions exceeding applicable South Coast Air Quality Management District (SCAQMD) thresholds, even with implementation of Mitigation Measures AQ-MM-1 through AQ-MM-3. Under threshold (c), both the Original Project and the Original Alternative 2 would have a potentially significant impact regarding localized construction-related emissions of Nox, PM10, and PM 2.5 emissions. However, with the implementation of Mitigation Measure AQ-MM-1, these potentially significant impacts would be reduced to a less than significant level under both the Original Project and the Original Alternative 2.

#### 3.1.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

**Threshold (a).** Similar to the Original Alternative 2, Modified Alternative 2 would be consistent with the goals of Southern California Association of Governments (SCAG's) 2016–2040 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS) and growth projections in the 2016 Air Quality Management Plan (AQMP), since the growth would occur in a High Quality Transit Area (HQTAs) and a Transit Priority Area (TPA) and the project's overall development size and scope would be similar and would also provide a mix of housing and employment on the site. Similar to the Original Alternative 2, Modified Alternative 2 would be consistent with the AQMP in its incorporation of appropriate control strategies for emissions reduction during construction and operation. In addition, similar to the Original Alternative 2, Modified Alternative 2 would also be

consistent with applicable goals, objectives, and policies of the Air Quality Element of the General Plan that support and encourage pedestrian activity in the City and Community Plan area and uses that contribute to a land use pattern addressing housing needs while reducing VMT and air pollutant emissions within a TPA. Based on the above, consistency with the AQMP would be similar under the Modified Alternative 2 and the Original Alternative 2, which were found to be similar to the Original Project and the Original Project with the Deck Concept in the Draft EIR.

**Threshold (b).** Similar to the Original Alternative 2, construction phases under Modified Alternative 2 have the potential to generate emissions that would exceed SCAQMD air quality standards, because construction activities would be similar for a mixed-use development with a similar massing and overall scope. The maximum daily emissions under Modified Alternative 2 would be similar to the Original Alternative 2 because emission levels are based on a single day in which maximum construction activity would occur. However, since Modified Alternative 2 would not include the concrete framing under the Original Alternative 2, a reduction of approximately 200,000 cubic yards, Modified Alternative 2 would have fewer overall concrete trucks, less concrete needed to construct the buildings, and a reduced construction air quality impact due to a shorter expected construction duration during the building construction phase compared to the Original Alternative 2. Similar to the Original Alternative 2, mitigation measures would be incorporated to reduce air quality impacts during construction activities. Although Modified Alternative 2 would have reduced concrete usage and therefore a reduction of 200,00 CY and concrete truck trip emissions as compared to the Project or the Original Alternative 2; nonetheless, Modified Alternative 2 would continue to exceed maximum daily air quality thresholds. Similar to the Original Alternative 2, even with incorporation of Mitigation Measure AQ-MM-1, maximum daily construction emissions under Modified Alternative 2 would exceed SCAQMD numerical significance thresholds for NOX, and impacts would be significant and unavoidable. However, impacts relative to air quality threshold standards under Modified Alternative 2 would be less than the Original Alternative 2 due to the reduction in concrete needed for construction, corresponding to a shorter building construction phase under Modified Alternative 2.

During operation, Modified Alternative 2 would result in a reduction of vehicle trips compared to the Original Alternative 2 due to its change in the mix of uses. During each of the analyzed peak hours, Modified Alternative 2 is projected to generate 8% (AM) to 34% (PM) fewer total peak hour trips than the Original Alternative 2, per the Technical Memorandum included as Attachment A to this Addendum (Modified Alternative 2 Traffic Memorandum). Despite this reduction, similar to the Original Alternative 2, it is expected that Modified Alternative 2 would exceed the daily impact threshold of 55 pounds per day of VOC emissions.<sup>2</sup> With implementation of Mitigation Measures AQ-MM-2 through AQ-MM-3 and TRAF-MM-1, VOC emissions would be slightly reduced under Modified Alternative 2, but would remain significant and unavoidable.

---

<sup>2</sup> The Project with the Deck Concept mitigated Nox mobile source emissions were 49 pounds per day based on a VMT of 198,540. Utilization the same proportion, Modified Alternative 2's VMT of 109,507 would result in 32 pounds per day of Nox emissions. Given that the Project with the Deck Concept's overall mitigated net Nox emissions were 81 pounds per day, assuming other Nox sources are roughly similar, Modified Alternative 2's net overall Nox emissions would be reduced to approximately 64 pounds per day, which is still over the 55 pound threshold.

Based on the above, construction and operational impacts under Modified Alternative 2 would be less than the Original Alternative 2, which were found to be greater than the Original Project during construction and less than the Original Project during operation, and less than the Original Project with the Deck Concept during both construction and operation in the Draft EIR.

**Threshold (c).** Maximum daily localized construction emissions under the Original Alternative 2 would be similar to Modified Alternative 2, since daily construction activities and equipment usage would be similar under both scenarios. However, construction under the Modified Alternative 2 would involve fewer daily construction truck trips and associated emissions and would occur for a shorter duration than under the Original Alternative 2 due to the elimination of the concrete framing architectural design. As with the Original Alternative 2, maximum localized emissions under Modified Alternative 2 associated with grading and architectural coatings during construction would be potentially significant and would require implementation of Mitigation Measure AQ-MM-1 to implement certain construction equipment features to reduce impacts related to exposure to sensitive receptors to less-than-significant levels. In addition, impacts related to localized emission levels, toxic air contaminants (TACs) and carbon monoxide (CO) hotspots would be slightly less under Modified Alternative 2 as compared to Original Alternative 2 due to the decreased construction truck trip emissions and decreased construction duration.

Similar to the Original Alternative 2, Modified Alternative 2 would emit criteria pollutants from mobile, stationary, and area sources as well as source emissions from architectural coating and consumer projects and landscaping. Operational impacts to sensitive receptors under Modified Alternative 2 would be less than significant and similar to the Original Alternative 2. However, impacts would be slightly less under Modified Alternative 2 based on the reduction in operational vehicle trips (see Attachment A, Modified Alternative 2 Traffic Memorandum).

Based on the above, construction and operational impacts under Modified Alternative 2 would be slightly less than the Original Alternative 2, which were found to be greater than the Original Project during construction and less than the Original Project during operation, and less than the Original Project with the Deck Concept during both construction and operation in the Draft EIR.

**Threshold (d).** Similar to the Original Alternative 2, Modified Alternative 2 would not create objectionable odors affecting a substantial number of people. Impacts related to odors and other emissions under Modified Alternative 2 would be similar to the Original Alternative 2 and the Original Project.

### **3.1.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?**

No substantial changes have occurred with respect to the circumstances under which the Project would be undertaken. Since the EIR was certified on January 22, 2024, no new major development has occurred around the Project Site. Land use patterns in the vicinity of the Project Site have remained the same and no major changes have occurred that would constitute changed circumstances for undertaking the Modified Alternative 2. Notably, the immediately adjacent uses surrounding the Project Site are the same as when the previous EIR was certified. The current circumstances in the immediate vicinity of the Project Site would not necessitate any changes to the conclusions presented in the Certified EIR.

### 3.1.4 Any New Information Requiring New Analysis or Verification?

There is no new information such as new cumulative projects, studies, plans, policies or regulations of substantial importance associated with the Modified Alternative 2 relative to air quality that would show that: (1) the Modified Alternative 2 would have one or more significant effects not discussed in the Certified EIR; (2) significant effects previously examined will be substantially more severe than shown in the Certified EIR; (3) mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the Project, but the Project proponents declined to adopt the mitigation measure or alternative; or (4) mitigation measures or alternatives which are considerably different from those analyzed in the Certified EIR would substantially reduce one or more significant effects on the environment, but the Project proponents declined to adopt the mitigation measure or alternative.

### 3.1.5 EIR's Mitigation Measures Addressing Impact

The following PDF and mitigation measures set forth in the Certified EIR and the associated MMRP to address air quality impacts would be implemented as part of the Modified Project. No additional mitigation measures are required, as no new significant air quality impacts would result from implementation of the Modified Project.

**Project Design Feature AQ-PDF-1: Fireplace Exclusion:** The residential units within the Project will not include the installation of natural gas-fueled fireplaces.

**Mitigation Measure AQ-MM-1: Construction Equipment Features:** The Applicant shall implement the following construction equipment features for equipment operating at the Project Site. These features shall be included in applicable bid documents, and successful contractor(s) must demonstrate the ability to supply such equipment. Construction features will include the following:

- The Project shall utilize off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and United States Environmental Protection Agency (USEPA) Tier 4 Final off-road emissions standards or equivalent for equipment rated at 50 horsepower (hp) or greater during Project construction. Such equipment shall be outfitted with Best Available Control Technology (BACT) which means a CARB certified Level 3 Diesel Particulate Filter or equivalent.
- During plan check, the Project's representative shall make available to the lead agency and South Coast Air Quality Management District (SCAQMD) a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that will be used during any of the construction phases. The inventory shall include the horsepower rating, engine production year, and certification of the specified Tier standard. A copy of each such unit's certified tier specification, best available control technology (BACT) documentation, and CARB or SCAQMD operating permit shall be maintained on-site at the time of mobilization of each applicable unit of equipment.
- Alternative-fueled generators shall be used when commercial models that have the power supply requirements to meet the construction needs of the Project are commercially available from local suppliers/vendors.

- Contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. All construction equipment must be properly tuned and maintained in accordance with the manufacturer’s specifications. The contractor shall keep documentation on-site demonstrating that the equipment has been maintained in accordance with the manufacturer’s specifications. Tampering with construction equipment to increase horsepower or to defeat emission control devices shall be prohibited.
- Construction activities shall be discontinued during second-stage smog alerts. A record of any second-stage smog alerts and of discontinued construction activities as applicable shall be maintained by the Contractor on-site.

**Mitigation Measure AQ-MM-2: Emergency Generator Maintenance & Testing:** The Project shall utilize SCAQMD Certified Internal Combustion (ICE) engine emergency generators that meet or exceed the California Air Resources Board (CARB) and United States Environmental Protection Agency (USEPA) Tier 4 Final emissions standards. Each emergency generator will normally be limited to one hour in a day for routine maintenance and testing purposes.

**Mitigation Measure AQ-MM-3: Emergency Generators:** The Project representative shall schedule routine maintenance and testing of the emergency generators installed on the Project Site on different days. Prior to the installation of emergency generators, the Project representative shall supply documentation to the City that emergency generator testing by contractors, service providers, or maintenance crews will be conducted in accordance with the specified requirements. The Project representative shall maintain records of emergency generator testing, including testing dates, which shall be made available to the City upon request.

### 3.1.6 Conclusion

Based on the Above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

## 3.2 CULTURAL RESOURCES

Thresholds (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR’s Mitigation Measures Addressing Impacts
<b>CULTURAL RESOURCES:</b> Would the project:					
(a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	Less than Significant with Mitigation	No	No	No	Yes
(b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	Less than Significant with Mitigation	No	No	No	Yes
(c) Disturb any human remains, including those interred outside of formal cemeteries?	Less than Significant	No	No	No	No

### 3.2.1 Impact Determination in the EIR

With regard to threshold (a), the EIR concluded that potentially significant impacts to the historic 7<sup>th</sup> Street Bridge would be reduced to a less than significant level under both the Original Project and the Original Alternative 2 with the implementation of Mitigation Measures CUL-MM-1 through CUL-MM-4 and NOISE-MM-6 through NOISE-MM-8. Under threshold (b), potentially significant impacts during excavation activities under both the Original Project and the Original Alternative 2 would be reduced to a less than significant level with the implementation of Mitigation Measures CUL-MM-5 through CUL-MM-8. Under threshold (c), the Original Project and the Original Alternative 2 would have a less than significant impact regarding impacts human remains.

### 3.2.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

**Threshold (a).** To accommodate Deck and roadway construction, the Original Alternative 2 and the Modified Alternative 2 would require the removal of the same extent of linear feet of existing character-defining railing at the historic 7th Street Bridge, resulting in a potentially significant historical resources impact. Thus, potentially significant direct impacts would be the same under the Original Alternative 2 and Modified Alternative 2. Construction vibration could also impact the structural integrity of the 7th Street Bridge under both the Original Alternative 2 and the Modified Alternative 2. Implementation of Mitigation Measures CUL-MM-1 through CUL-MM-4 and NOISE-MM-6 through NOISE-MM-8 would reduce impacts under the Original Alternative 2 and Modified Alternative 2 to levels that would be less than significant.

Based on the above, direct and indirect impacts would be similar under Modified Alternative 2 and the Original Alternative 2, which were found to be greater than the Original Project and similar to the Original Project with the Deck Concept in the Draft EIR.

**Threshold (b).** Modified Alternative 2 would require the same depth and volume of excavation for the subterranean parking levels as the Original Alternative 2. As with Original Alternative 2, grading and excavation for the Modified Alternative 2, including excavation for subterranean parking may encounter unknown archaeological resources. As such, excavation activities have the potential to disturb, damage, or degrade archaeological resources that could be encountered during construction and, thus, impact archaeological resources. With implementation of Mitigation Measures CUL-MM-5 through CUL-MM-7, impacts to archaeological resources under the Original Alternative 2 and Modified Alternative 2 would be reduced to less-than-significant levels.

As such, impacts to archeological resources under Modified Alternative 2 would be similar to the Original Alternative 2, which were found to be greater than the Original Project and less than the Original Project with the Deck Concept in the Draft EIR.

**Threshold (c).** Modified Alternative 2 would require the same depth and volume of excavation for the subterranean parking levels as the Original Alternative 2. As with the Original Alternative 2, grading and excavation for the Modified Alternative 2, including excavation for subterranean parking may encounter unrecorded human remains. Although no human remains have been recorded within the Project Site or within a 0.5-mile radius of the Project Site, all excavation activity under the Original Alternative 2 and Modified Alternative 2 has the potential to encounter unrecorded human remains. In the event that any human remains are recovered, the Original



Alternative 2 and Modified Alternative 2 would implement procedures codified in PRC Section 5097.98 and State Health and Safety Code Section 7050.5 to ensure appropriate handling of any recovered human remains and that any impacts to human remains would be less than significant.

As such, impacts to human remains under Modified Alternative 2 would be similar to the Original Alternative 2, which were found to be greater than the Original Project and less than the Original Project with the Deck Concept in the Draft EIR.

### **3.2.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?**

No substantial changes have occurred with respect to the circumstances under which the Project would be undertaken. Since the EIR was certified on January 22, 2024, no new major development has occurred around the Project Site. Land use patterns in the vicinity of the Project Site have remained the same and no major changes have occurred that would constitute changed circumstances for undertaking the Modified Alternative 2. Notably, the immediately adjacent uses surrounding the Project Site are the same as when the previous EIR was certified. The current circumstances in the immediate vicinity of the Project Site would not necessitate any changes to the conclusions presented in the Certified EIR.

### **3.2.4 Any New Information Requiring New Analysis or Verification?**

There is no new information such as new cumulative projects, studies, plans, policies or regulations of substantial importance associated with the Modified Alternative 2 relative to cultural resources that would show that: (1) the Modified Alternative 2 would have one or more significant effects not discussed in the Certified EIR; (2) significant effects previously examined will be substantially more severe than shown in the Certified EIR; (3) mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the Project, but the Project proponents declined to adopt the mitigation measure or alternative; or (4) mitigation measures or alternatives which are considerably different from those analyzed in the Certified EIR would substantially reduce one or more significant effects on the environment, but the Project proponents declined to adopt the mitigation measure or alternative.

### **3.2.5 EIR's Mitigation Measures Addressing Impact**

The following mitigation measures set forth in the Certified EIR and the associated MMRP to address cultural resource impacts would be implemented as part of the Modified Project. No additional mitigation measures are required, as no new significant cultural resource impacts would result from implementation of the Modified Project.

**CUL-MM-1: Standards Conformance Plan Review for 7th Street Bridge.** The Project proposes new vehicular/pedestrian ramps that would connect to the 7th Street Bridge and would result in removal of character-defining features and materials. To reduce potential impacts, the Applicant shall retain a qualified preservation consultant, meeting the Secretary of the Interior's Professional Qualifications Standards for History, Architectural History, or Architecture, pursuant to 36 CFR 61 and who has at least 10 years of experience in design review and collaboration applying the Standards (Qualified Preservation Professional) to review the draft and final plans for the Project,

to ensure conformance with the Secretary of the Interior's Standards for Rehabilitation (Standards).

- Where the Project could impact the physical materials of the 7th Street Bridge, the Qualified Preservation Professional shall provide recommendations for appropriate protective measures and preservation treatment (repair or in-kind replacement) of the affected historic bridge fabric to be retained, to ensure that historic features, materials and finishes are protected, and that the 7th Street Viaduct Plaque and the light post shall be protected during removal, storage, and relocation.
- The Qualified Preservation Professional shall prepare a Plan Review Report, documenting conformance with the Standards, which shall be submitted as a draft to the City's Department of City Planning Office of Historic Resources, within 30 days of completion of the final design plans, and shall make any recommendations necessary to bring the Project design for the alterations and additions to the 7th Street Bridge into conformance with the Standards.
- Once the Project plans have been revised and are ready to be finalized, the Qualified Preservation Professional shall review the 90 percent construction plans and prepare a final report documenting conformance with the Standards, which shall be submitted to the City's Department of City Planning Office of Historic Resources, for final approval.

**CUL-MM-2: Reproduction of the 7th Street Bridge Railings.** The 7th Street Bridge's existing concrete railings are not original but are reproductions of the originals. Prior to their removal, the Applicant shall prepare molds for the 7th Street Bridge's concrete railings. The molds shall be securely stored on-site, ensuring that the railings could be reinstalled in the future if necessary and that the 7th Street Bridge can be returned to its current condition.

**CUL-MM-3: Construction Monitoring for the 7th Street Bridge.** Prior to any demolition or construction activities that would affect the historic fabric of the 7th Street Bridge, including removal of steps, fencing, or other existing materials attached to or part of the bridge, removal of the bridge's concrete railings or light post, or alteration of structural features such as bents, a Qualified Preservation Professional shall be retained to document existing conditions and provide preservation treatment recommendations including protective measures and treatment recommendations.

- Prior to commencement of construction activities, the Qualified Preservation Professional shall document existing conditions at Project locations where alterations are to be made and meet with and provide preservation guidelines and instructions to the construction manager and team.
- During construction, the Qualified Preservation Professional shall monitor and document the Project, including demolition monitoring, preservation treatment oversight, and construction monitoring for Project components that would affect the character-defining features of the bridge such as any structural alterations of the 7th Street Bridge, removal/construction of pedestrian stairs, construction of vehicular ramps/intersections, removal of railings, relocation of the 7th Street Viaduct Plaque and light post and fixture, installation of new street signals, and if included, construction of the Deck. The Qualified

Preservation Professional shall provide oversight and monitoring for the preparation of molds of the 7th Street Bridge's existing concrete railings (see CUL-MM-2) and shall also provide preservation oversight and monitoring for the removal and relocation of the 7th Street Viaduct Plaque and the historic light post on the bridge's railings that would be removed and relocated. The Qualified Preservation Professional shall document the existing conditions of the railing, 7th Street Viaduct Plaque and light post prior to their removal; monitor the railing mold-making process and appropriate storage of the molds for potential future use; monitor the process of removal of the 7th Street Viaduct Plaque and light post; review and document procedures for temporary storage of the 7th Street Viaduct Plaque and light post; monitor the 7th Street Viaduct Plaque and light post relocation and reinstallation process; and provide preservation treatment recommendations for repair of the 7th Street Viaduct Plaque and light post in conformance with the Standards. Monitoring intervals are to be determined based upon construction schedule and timing of Project activities that will affect the 7th Street Bridge. The monitoring visits shall be documented in a monitoring report for each visit. Once the majority of the construction activities affecting the 7th Street Bridge are completed, the Qualified Preservation Professional shall document the Project's conformance with the Standards in a Substantial Completion Report that shall be submitted to the City's Department of City Planning Office of Historic Resources for review and approval.

**CUL-MM-4: Historic Structure Report for the 7th Street Bridge.** The 7th Street Bridge was previously documented in a Historic American Engineering Record report that summarized the history of the bridge and included copies of the historic bridge plans. The existing bridge exhibits several alterations from its original design, and under the Project will undergo additional alterations. To provide a baseline for the current Project and protect the integrity of the bridge under the current and future projects, a Historic Structures Report (HSR) shall be prepared by a Qualified Preservation Professional in accordance with guidelines set forth by the National Park Service in Preservation Brief No. 43: "The Preparation and Use of Historic Structure Reports" by Deborah Slaton (Slaton, 2005: 1). The HSR shall provide a summary of the bridge's history and existing condition through available historic plans, current plans, and physical information. The HSR shall act as a guidance document for the current project and any future projects on the 7th Street Bridge. The HSR shall include guidelines for the most appropriate approach to treatment for any currently proposed work, including, but not limited to, protective measures, rehabilitation, repair, in-kind replacement, preservation treatment of materials/features, and maintenance. The HSR shall follow the three-part format and organization as outlined in Preservation Brief No. 43, including the following: Part 1 – the bridge's history, chronology, physical description, significance, and existing condition assessment; Part 2 – Treatment and Work Recommendations for the Project; and Part 3 – Supplemental Record of Work Performed including planning or technical studies or other investigations, records of physical work, construction documents, annotated drawings, construction monitoring logs, photographs, the Project plans showing the proposed alterations to the 7th Street Bridge, the Substantial Completion Report, and any other pertinent technical data or documentation. This report shall be reviewed by the City's Office of Historic Resources and Bureau of Engineering, to ensure that that the HSR meets the City's requirements. Once the Project is completed, the Applicant shall file the HSR with the City's Department of City Planning Office of Historic Resources and Bureau of Engineering, and the South Central Coastal Information Center (SCCIC).

**CUL-MM-5:** Prior to the issuance of a demolition permit, the Applicant shall retain a qualified Archaeologist who meets the Secretary of the Interior’s Professional Qualifications Standards for professional archaeology (qualified Archaeologist) to carry out and ensure proper implementation of mitigation measures that address archaeological resources. The Applicant shall submit a letter of retention to the City of Los Angeles Department of City Planning (City) no fewer than 15 days before construction activities commence to demonstrate to the City that the Applicant has retained a qualified Archaeologist who meets the Secretary of the Interior’s Professional Qualifications Standards. The letter shall include a resume for the qualified Archaeologist. The letter shall also demonstrate that a Native American Monitor from the Gabrieleño Band of Mission Indians – Kizh Nation has been retained as required by Mitigation Measure TCR-MM-1.

The qualified Archaeologist shall oversee an archaeological monitor who has a bachelor’s degree in a relevant field of study and either two months of archaeological construction monitoring experience or two months of supervised training with prehistoric or historic archaeological materials in a field or laboratory setting. The archaeological monitor shall be present during construction activities on the Project Site deemed by the qualified Archeologist to have the potential for encountering archeological resources, such as demolition, pavement removal, clearing/grubbing, drilling/auguring, potholing, grading, trenching, excavation, tree removal, or other ground disturbing activity associated with the Project. The activities to be monitored may also include off-site improvements in the vicinity of the Project Site, such as utilities, sidewalks, or road improvements. The archeological monitor and Native American Monitor shall have the authority to direct the pace of construction equipment activity in areas of higher sensitivity and to temporarily divert, redirect or halt ground disturbance activities to allow identification, evaluation, and potential recovery of archaeological resources in coordination with the qualified Archaeologist. Full-time monitoring may be reduced to part-time inspections, or ceased entirely, if determined appropriate by the qualified Archaeologist after consulting with Native American Monitor.

**CUL-MM-6:** Prior to commencement of construction activities, a Sensitivity Training shall be given by the qualified Archaeologist and Native American Monitor for construction personnel. The training shall focus on how to identify archaeological resources and tribal cultural resources that may be encountered during construction activities, and the procedures to be followed in such an event. Within 5 days of completing the training, a list of those in attendance shall be provided by the qualified Archaeologist to the Applicant. Applicant shall maintain the documentation of this training, including the list of attendees, for inspection by the City upon its reasonable request.

**CUL-MM-7:** In the event that historic (e.g., bottles, foundations, refuse dumps/privies, railroads, etc.) or prehistoric (e.g., hearths, stone tools, shell and faunal bone remains, etc.) archaeological resources are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. An appropriate buffer area shall be established by the archaeological monitor and the Native American Monitor (in the case of prehistoric resources) in accordance with industry standards, reasonable assumptions regarding the potential for additional discoveries in the vicinity, and safety considerations for those making an evaluation and potential recovery of the discovery. This buffer area shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area.

All resources unearthed by Project construction activities shall be evaluated by the qualified Archaeologist. If a resource is determined by the qualified Archaeologist to constitute a “historical resource” pursuant to CEQA Guidelines Section 15064.5(a) or a “unique archaeological resource” pursuant to Public Resources Code Section 21083.2(g), the qualified Archaeologist shall coordinate with the Applicant and the City to develop a formal treatment plan that would serve to reduce impacts to the resource. The treatment plan established for the resource shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If in coordination with the City, it is determined that preservation in place is not feasible, appropriate treatment of the resource shall be developed by the qualified Archaeologist in coordination with the City and may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any archaeological material collected shall be curated at a public, non-profit institution with a research interest in the materials, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be donated to a local school, Tribe, or historical society in the area for educational purposes.

In the event encountered resources appear to qualify as tribal cultural resource, a meeting between the City, the qualified Archeologist, Native American Monitor, and the Applicant shall be held to discuss the significance of the find and whether it qualifies as a tribal cultural resource pursuant to Public Resources Code Section 21074(a). If the resource is determined to be a tribal cultural resource, appropriate treatment shall be determined per the procedures outlined in Mitigation Measure TCR-MM-2.

**CUL-MM-8:** Within 14 days of concluding the archaeological monitoring, the qualified Archaeologist shall prepare a memorandum stating that the archaeological monitoring requirement of the mitigation measure has been fulfilled and summarize the results of any archaeological finds. The memorandum shall be submitted to the Applicant and City. Following submittal of the memorandum, the qualified Archaeologist shall prepare a technical report that follows the format and content guidelines provided in California Office of Historic Preservation’s Archaeological Resource Management Reports (ARMR). The technical report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical Resources and CEQA. Appropriate California Department of Parks and Recreation Site Forms (Site Forms) shall also be prepared and provided in an appendix to the report. The technical report shall be prepared under the supervision of the qualified Archaeologist and submitted to the City within 150 days of completion of the monitoring. The final draft of the report shall be submitted to the South Central Coastal Information Center.

### **3.2.6 Conclusion**

Based on the Above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

### 3.3 ENERGY

Thresholds (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
<b>ENERGY:</b> Would the project:					
(a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?; or	Less than Significant	No	No	Yes	No
(b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	Less than Significant	No	No	No	No

#### 3.3.1 Impact Determination in the EIR

With regards to energy, the EIR concluded that energy impacts under thresholds (a) and (b) would be less than significant under both the Original Project and the Original Alternative 2.

#### 3.3.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

**Threshold (a).** As with the Original Alternative 2, Modified Alternative 2 would utilize fuel-efficient construction equipment consistent with State and federal regulations. During construction, either project would utilize only the energy necessary for the on-site activities and to transport construction materials and demolition debris to and from the Project Site, and construction energy impacts would be less than significant.

During operations, because of proximity to transit and services and location within a HQTAs, this would result in reductions in vehicle emissions, and with the installation of 10 percent EV stations and 30 percent EV-ready stations, Modified Alternative 2 (similar to Original Alternative 2), would minimize operational transportation fuel demand. Both the Original Alternative 2 and Modified Alternative 2 would incorporate Project Design Features GHG-PDF-1 and WS-PDF-1 to minimize water demand and energy use. Therefore, Modified Alternative 2, as with the Original Alternative 2, would not cause wasteful, inefficient, or unnecessary consumption of energy during construction or operation and, as such, impacts related to efficient energy consumption would be less than significant. While Modified Alternative 2 would have a similar overall building floor area as the Original Alternative 2, it would have reduced transportation energy demand with less trips and VMT than the Original Alternative 2 as discussed under subsection 3.12.2, below, and per the analysis included in Attachment A, Modified Alternative 2 Traffic Memorandum. As such, it can be expected that Modified Alternative 2 would have reduced energy consumption impacts than the Original Alternative 2, which were found to be less than the Original Project and the Original Project with the Deck Concept in the Draft EIR.

**Threshold (b).** As with the Original Alternative 2, Modified Alternative 2 would also comply with existing energy standards, would include a project design and building operation that would incorporate energy-conservation measures, including GHG-PDF-1 (Green Building Features) and WS-PDF-1 (Water Conservation Features), beyond those otherwise required by Code, and would incorporate similar Project Design Features and accommodate future EV charging stations to increase energy efficiency, and, as such, would not conflict with adopted plans for renewable energy or energy efficiency. By exceeding the regulatory standards, similar to the Original Alternative 2, Modified Alternative 2 would have a less-than-significant impact regarding the provisions of plans for renewable energy and energy efficiency. As Modified Alternative 2 would be in compliance with plans for renewable energy and energy efficiency, impacts under Modified Alternative 2 would be less than significant and similar to the Original Alternative 2, which were found to be similar to the Original Project and the Original Project with the Deck Concept in the Draft EIR.

### **3.3.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?**

No substantial changes have occurred with respect to the circumstances under which the Project would be undertaken. Since the EIR was certified on January 22, 2024, no new major development has occurred around the Project Site. Land use patterns in the vicinity of the Project Site have remained the same and no major changes have occurred that would constitute changed circumstances for undertaking the Modified Alternative 2. Notably, the immediately adjacent uses surrounding the Project Site are the same as when the previous EIR was certified. The current circumstances in the immediate vicinity of the Project Site would not necessitate any changes to the conclusions presented in the Certified EIR.

### **3.3.4 Any New Information Requiring New Analysis or Verification?**

There is no new information such as new cumulative projects, studies, plans, policies or regulations of substantial importance associated with the Modified Alternative 2 relative to energy that would show that: (1) the Modified Alternative 2 would have one or more significant effects not discussed in the Certified EIR; (2) significant effects previously examined will be substantially more severe than shown in the Certified EIR; (3) mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the Project, but the Project proponents declined to adopt the mitigation measure or alternative; or (4) mitigation measures or alternatives which are considerably different from those analyzed in the Certified EIR would substantially reduce one or more significant effects on the environment, but the Project proponents declined to adopt the mitigation measure or alternative.

### **3.3.5 EIR's Mitigation Measures Addressing Impact**

Refer to Project Design Features GHG-PDF-1 and WS-PDF-1. No mitigation measures are required to address energy impacts as impacts would be less than significant.

### 3.3.6 Conclusion

Based on the Above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

## 3.4 GEOLOGY AND SOILS

Thresholds (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
<b>GEOLOGY AND SOILS:</b> Would the project:					
(a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:					
(i) Rupture of a known earthquake fault, as delineated on Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. Refer to Division of Mines and Geology <sup>1</sup> Special Publication 42.)	Less than Significant	No	No	No	No
(ii) Strong seismic ground shaking?	Less than Significant	No	No	No	No
(iii) Seismic-related ground failure, including liquefaction?	Less than Significant	No	No	No	No
(iv) Landslides?	Less than Significant	No	No	No	No
(b) Result in substantial soil erosion or the loss of topsoil?	Less than Significant	No	No	No	No
(c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	Less than Significant	No	No	No	No
(d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	Less than Significant	No	No	No	No
(e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of waste water?	No Impact	No	No	No	No
(f) Directly or indirectly destroy a unique paleontological resource or site of unique geologic feature.	Less than Significant with Mitigation	No	No	No	Yes

<sup>1</sup> Now the California Geological Survey (CGS).



### 3.4.1 Impact Determination in the EIR

With regards to thresholds (a) through (e), the EIR concluded that geology and soils impacts would be less than significant for both the Original Project and the Original Alternative 2. Under Threshold (f), both the Original Project and the Original Alternative 2 would have a potentially significant impact to paleontological resources during the excavation phase of construction. This impact would be reduced to a less than significant level with the implementation of Mitigation Measures GEO-MM-1 through GEO-MM-4 under both the Original Project and the Original Alternative 2.

### 3.4.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

**Threshold (a)-(d).** As with the Original Alternative 2, Modified Alternative 2 is not located within an Alquist-Priolo Special Studies Zone (earthquake fault zone) or in proximity to any identified active faults, would implement the Los Angeles Building Code's seismic safety regulations, as well as CBC regulations related to specific seismic zones, and would comply with applicable code and regulatory requirements including BMPs as required under the SWPPP that control erosion of soils. Additionally, Modified Alternative 2 would require the same depth and volume of excavation for the subterranean parking levels as the Original Alternative 2. As such, geological impacts under Modified Alternative 2 would be similar to Original Alternative 2, which were found to be similar to the Original Project and the Original Project with the Deck Concept in the Draft EIR.

**Threshold (e).** Similar to the Original Alternative 2, Modified Alternative 2 would not use septic tanks or alternative wastewater systems and no impact would occur. As such, impacts under Modified Alternative 2 would be the same as the Original Alternative 2 and the Original Project.

**Threshold (f).** Modified Alternative 2 would require the same depth and volume of excavation for the subterranean parking levels as the Original Alternative 2, and would also implement Mitigation Measures GEO-MM-1 through GEO-MM-4 to reduce impacts to paleontological resources to less-than-significant levels. As such, impacts to paleontological resources under Modified Alternative 2 would be similar to the Original Alternative 2, which were found to be greater than the Original Project and less than the Original Project with the Deck Concept in the Draft EIR.

### 3.4.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

No substantial changes have occurred with respect to the circumstances under which the Project would be undertaken. Since the EIR was certified on January 22, 2024, no new major development has occurred around the Project Site. Land use patterns in the vicinity of the Project Site have remained the same and no major changes have occurred that would constitute changed circumstances for undertaking the Modified Alternative 2. Notably, the immediately adjacent uses surrounding the Project Site are the same as when the previous EIR was certified. The current circumstances in the immediate vicinity of the Project Site would not necessitate any changes to the conclusions presented in the Certified EIR.

### 3.4.4 Any New Information Requiring New Analysis or Verification?

There is no new information such as new cumulative projects, studies, plans, policies or regulations of substantial importance associated with the Modified Alternative 2 relative to geology and soils that would show that: (1) the Modified Alternative 2 would have one or more significant effects not discussed in the Certified EIR; (2) significant effects previously examined will be substantially more severe than shown in the Certified EIR; (3) mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the Project, but the Project proponents declined to adopt the mitigation measure or alternative; or (4) mitigation measures or alternatives which are considerably different from those analyzed in the Certified EIR would substantially reduce one or more significant effects on the environment, but the Project proponents declined to adopt the mitigation measure or alternative.

### 3.4.5 EIR's Mitigation Measures Addressing Impact

The following mitigation measures set forth in the Certified EIR and the associated MMRP to address paleontological impacts would be implemented as part of the Modified Project. No additional mitigation measures are required, as no new significant paleontological impacts would result from implementation of the Modified Project.

**GEO-MM-1:** A qualified paleontologist meeting the Society of Vertebrate Paleontology (SVP) Standards (Qualified Paleontologist) shall be retained prior to the approval of demolition or grading permits. The Qualified Paleontologist shall provide technical and compliance oversight of all ground-disturbing activities (e.g., clearing, grading and excavation) that relate to paleontological resources, shall attend the Project kick-off meeting and any construction progress meetings, and shall report to the Project Site in the event potential paleontological resources are encountered in order to assess the significance of the discovery and determine appropriate documentation and/or salvage.

**GEO-MM-2:** The Qualified Paleontologist shall conduct construction worker paleontological resources sensitivity training prior to the start of ground-disturbing activities (including vegetation removal, pavement removal, etc.), in accordance with SVP Standards. In the event construction crews are phased, additional trainings shall be conducted for new construction personnel. The training session shall focus on recognition of the types of paleontological resources that could be encountered within the Project Site and the procedures to be followed if they are found. Documentation shall be retained demonstrating that all construction personnel attended the training.

**GEO-MM-3:** Full-time paleontological resources monitoring shall be conducted for all ground-disturbing activities in previously undisturbed sediments that exceed 10 feet in depth, and are, therefore, likely to impact high-sensitivity older Alluvial sediments. The surficial Alluvium has low paleontological sensitivity, and, therefore, work in the upper 10 feet of the Project Site does not need to be monitored. The Qualified Paleontologist shall spot-check the excavation on an intermittent basis and recommend revision of the depth of required monitoring based on his/her observations. The frequency of spot-checks shall be determined based on the pace of excavations, both vertically and laterally. Paleontological resources monitoring shall be performed by a qualified paleontological monitor (meeting the standards of the SVP) under the direction of

the Qualified Paleontologist. Full-time monitoring can be reduced to part-time inspections or ceased entirely if determined adequate by the qualified paleontologist. Monitors shall have the authority to temporarily halt or divert work away from exposed fossils in order to recover the fossil specimens. Any significant fossils that could yield information important to prehistory, or that embody the distinctive characteristics of a type of organism, environment, period of time, or geographic region, collected during Project-related excavations shall be prepared to the point of identification and curated into an accredited repository with retrievable storage. Monitors shall prepare daily logs detailing the types of activities and soils observed, and any discoveries. The Qualified Paleontologist shall prepare a final monitoring and mitigation report to document the results of the monitoring effort, and shall provide the final report to the Department of City Planning.

**GEO-MM-4:** If construction or other Project personnel discover any potential fossils during construction, regardless of the depth of work or location, work at the discovery location shall cease within a 50-foot radius of the discovery until the Qualified Paleontologist has assessed the discovery and made recommendations as to the appropriate treatment. If the find is deemed significant, it shall be salvaged following the standards of the SVP and curated with a certified repository. If there are significant discoveries, fossil locality information and final disposition will be included within the final report which will be submitted to the appropriate repository and the Department of City Planning.

### 3.4.6 Conclusion

Based on the Above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

## 3.5 GREENHOUSE GAS EMISSIONS

Thresholds (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
<b>GREENHOUSE GAS EMISSIONS:</b> Would the project:					
(a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?; or	Less than Significant	No	No	No	No
(b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Less than Significant	No	No	No	No

### **3.5.1 Impact Determination in the EIR**

With regards to greenhouse gas emissions, the EIR concluded that impacts under thresholds (a) and (b) would be less than significant for both the Original Project and the Original Alternative 2.

### **3.5.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?**

**Thresholds (a)-(b).** As with the Original Alternative 2, Modified Alternative 2 would be consistent with applicable strategies outlined in the Climate Change Scoping Plan, 2020–2045 RTP/SCS, the L.A.’s Green New Deal (Sustainable City pLAn 2019), and the Los Angeles Green Building Code. Both the Original Alternative 2 and Modified Alternative 2 are located within an HQTAdesignated location, which would also encourage utilization of alternative modes of transportation in support of the applicable GHG emission reduction plans and policies, and would include features that comply with regulations that implement these regulation plans. The Project’s consistency with these applicable regulatory plans and policies to reduce GHG emissions, along with implementation of Project Design Features, such as GHG-PDF-1 (Green Building Features) and WS-PDF-1 (Water Conservation Features) would reduce the Project’s GHG emissions by approximately 25 percent for both scenarios (i.e., Project scenario and Project without Reduction Features scenario). As the Modified Project would implement the same Project Design Features as the Original Project and the Original Alternative 2, greenhouse gas emission impacts under Modified Alternative 2 would be similar to the Original Alternative 2, which were found to be similar to the Original Project and the Original Project with the Deck Concept in the Draft EIR.

### **3.5.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?**

No substantial changes have occurred with respect to the circumstances under which the Project would be undertaken. Since the EIR was certified on January 22, 2024, no new major development has occurred around the Project Site. Land use patterns in the vicinity of the Project Site have remained the same and no major changes have occurred that would constitute changed circumstances for undertaking the Modified Alternative 2. Notably, the immediately adjacent uses surrounding the Project Site are the same as when the previous EIR was certified. The current circumstances in the immediate vicinity of the Project Site would not necessitate any changes to the conclusions presented in the Certified EIR.

### **3.5.4 Any New Information Requiring New Analysis or Verification?**

There is no new information such as new cumulative projects, studies, plans, policies or regulations of substantial importance associated with the Modified Alternative 2 relative to greenhouse gas emissions that would show that: (1) the Modified Alternative 2 would have one or more significant effects not discussed in the Certified EIR; (2) significant effects previously examined will be substantially more severe than shown in the Certified EIR; (3) mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the Project, but the Project proponents declined to adopt the mitigation measure or alternative; or (4) mitigation measures or alternatives which are considerably different from those analyzed in the Certified EIR would substantially

reduce one or more significant effects on the environment, but the Project proponents declined to adopt the mitigation measure or alternative.

### **3.5.5 EIR's Mitigation Measures Addressing Impact**

No mitigation measures were required. The following PDF (Project Design Feature GHG-PDF-1) and Project Design Features AQ-PDF-1 and WS-PDF-1 set forth in the Certified EIR and the associated MMRP would be implemented as part of the Modified Project. No new mitigation measures are required, as no new significant greenhouse gas emission impacts would result from implementation of the Modified Project.

**Project Design Feature GHG-PDF-1: Green Building Features.** The Project will be designed to achieve the equivalent of the United States Green Building Council (USGBC) Leadership in Energy and Environmental Design (LEED) Silver Certification level for new buildings. The Project will demonstrate compliance with the LEED Silver Certification or equivalent green building standards by providing architectural and engineering documentation, building energy modeling simulations, and other supporting evidence consistent with USGBC accepted documentation standards. Pre-construction documentation that indicates the Project is designed to achieve the number of points required for LEED Silver Certification will be provided to the City prior to building permit issuance. Post-construction documentation that indicates the Project operates within the expected parameters to achieve the number of points required for LEED Silver Certification will be provided to the City after completion of the required LEED commissioning activities. As part of the Project's LEED Silver Certification or equivalent green building standards, the Project will optimize building energy performance and achieve a minimum of four points in the Energy and Atmosphere Credit 2 category (LEED version 4), which means a 12 percent reduction from the LEED baseline, which is based on the ASHRAE 90.1-2010 standard in LEED version 4. The Project will reduce water usage and achieve a minimum of one point in the Water Efficiency Credit 1 category (LEED version 4), which means a 50 percent reduction in outdoor water use for irrigation from the LEED baseline, and a minimum of five points in the Water Efficiency Credit 2 category (LEED version 4), which means a 45 percent reduction in indoor water use from the LEED baseline.

### **3.5.6 Conclusion**

Based on the Above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

## 3.6 HAZARDS AND HAZARDOUS MATERIALS

Thresholds (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
<b>HAZARDS AND HAZARDOUS MATERIALS:</b> Would the project:					
(a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Less than Significant	No	No	No	No
(b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	Less than Significant with Mitigation	No	No	No	Yes
(c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Less than Significant	No	No	No	No
(d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	Less than Significant	No	No	No	No
(e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	No Impact	No	No	No	No
(f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Less than Significant	No	No	No	No
(g) Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	No Impact	No	No	No	No

### 3.6.1 Impact Determination in the EIR

With regards to thresholds (a), and (c) through (g), the EIR concluded that impacts would be less than significant under the Original Project and the Original Alternative 2. Under threshold (b), both the Original Project and the Original Alternative 2 would have a potentially significant impact to construction workers and the environment due to potential elevated concentrations of hazardous materials that could be present in excavated soils. However, with the implementation of Mitigation

Measures HAZ-MM-1 through HAZ-MM-3, such impacts would be reduced to a less than significant level under both the Original Project and the Original Alternative 2.

### **3.6.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?**

**Threshold (a).** Construction of Modified Alternative 2, as with Original Alternative 2, would include demolition of existing warehouse buildings and surface parking lots. Construction equipment and materials, such as fuels, oils and lubricants, solvents and cleaners, adhesives, paints and thinners, degreasers, cement and concrete, and asphalt mixtures, which are all commonly used in construction, would be used, stored, and disposed of in consumer quantities and in accordance with applicable laws and regulations and manufacturers' instructions. As with the Original Alternative 2, operation of Modified Alternative 2 would involve the limited use of potentially hazardous materials typical of those used in residences, offices, and restaurants, including cleaning agents, paints, pesticides, and other materials used for landscaping. In addition, hazardous materials on the Project Site would continue to be acquired, handled, used, stored, and disposed of in accordance with all manufacturers' specifications and all applicable federal, State, and local requirements. Modified Alternative 2 would comply with all applicable regulations concerning the transport, use, and disposal of hazardous waste, as with the Original Alternative 2, and impacts would be less than significant. Due to the similarity in the developed floor area and the land uses that are proposed under Modified Alternative 2 and the Original Alternative 2, impacts with respect to the routine transport, use and disposal of hazardous materials would be similar. As such, impacts under Modified Alternative 2 would be similar to the Original Alternative 2, which were found to be similar to the Original Project and the Original Project with the Deck Concept in the Draft EIR.

**Threshold (b).** During construction, the potential release of hazardous materials in the soils including herbicides for weed control, hydrocarbons, metals, creosote, and naphthalene associated with the adjacent railroad operations could occur, resulting a potentially significant impact. Similar to the Original Alternative 2, Modified Alternative 2 would implement Mitigation Measure HAZ-MM-3 to address the potential release of hazardous materials and/or methane gas during performed earthwork at the Railway Properties. Mitigation Measure HAZ-MM-3 requires soil sampling at the Railway Properties prior to construction of the Deck. Similar to the Original Alternative 2, Modified Alternative 2 would also implement Mitigation Measures HAZ-MM-1 and HAZ-MM-2 in the event of elevated contaminant levels that exceed applicable regulatory standards. Implementation of these measures would reduce impacts to a level of less than significant under both the Original Alternative 2 and Modified Alternative 2. As such, construction impacts under Modified Alternative 2 would be similar to the Original Alternative 2, which were found to be greater than the Original Project and less than the Original Project with the Deck Concept in the Draft EIR.

During operation, similar to the Original Alternative 2, no hazardous materials under the Modified Alternative 2 would be used during day-to-day operations other than typical housekeeping, restaurant, vehicle, pool, and landscape maintenance materials, such as cleaning supplies, paints and thinners, fuels, oil and grease, pesticides, herbicides, water disinfectants, and fertilizers. In addition, the use of these materials would be in relatively small quantities and in accordance with the manufacturers' instructions for reasonably foreseeable upset or accident conditions involving

the release of hazardous materials. Impacts under Modified Alternative 2 would be less than significant, similar to the Original Alternative 2, the Original Project and the Original Project with the Deck Concept.

**Threshold (c).** Modified Alternative 2, as with the Original Alternative 2, is not located within one-quarter mile of a school. Therefore, similar to the Original Alternative 2, impacts regarding use of hazardous materials within one-quarter mile of a school under Modified Alternative 2 would be less than significant. As such, impacts under Modified Alternative 2 would be similar to the Original Alternative 2, which were found to be similar to the Original Project and the Original Project with the Deck Concept in the Draft EIR.

**Threshold (d).** While the Project Site is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, the listing was for a former on-site textile manufacturing facility that had a permit for air emissions and no record of violations and is no longer operating at the Project Site. Similar to the Original Alternative 2, footings for the Deck under Modified Alternative 2 would extend over the railroad tracks, which are also not listed hazardous material sites. As such, impacts related to hazardous materials sites under Modified Alternative 2 would be less than significant and similar to the Original Alternative 2, which were found to be similar to the Original Project and the Original Project with the Deck Concept in the Draft EIR.

**Threshold (e).** The Project Site is not within an airport land use plan, and it is not within two miles of a public airport or public use airport. The nearest airport is the Hawthorne Municipal Airport located over 10 miles southwest of the Project Site. No impacts would occur, and impacts under Modified Alternative 2 would be the same as the Original Alternative 2 and the Original Project.

**Threshold (f).** Modified Alternative 2, as with the Original Alternative 2, would involve new construction and increased traffic, as compared to current conditions. Modified Alternative 2, as with the Original Alternative 2, would not physically alter the City's designated disaster routes, and would implement Project Design Feature TRAF-PDF-1 to ensure that adequate access for emergency vehicles would be maintained. As with the Original Alternative 2, compliance with existing regulations would ensure that adequate emergency response and access would be maintained for Modified Alternative 2. Impacts under Modified Alternative 2 with respect to conflicts with or interfering with emergency response or evacuation plans would be less than significant and would be similar to the Original Alternative 2, which were found to be similar to the Original Project and the Original Project with the Deck Concept in the Draft EIR.

**Threshold (g).** The Project Site is located in an urbanized area. No wildlands are present on the Project Site or surrounding area. Furthermore, the Project Site is not within a City-designated wildfire hazard area, or a CAL FIRE, Fire Hazard Severity Zone. No impacts would occur, and impacts under Modified Alternative 2 would be the same as the Original Alternative 2 and the Original Project.

### **3.6.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?**

No substantial changes have occurred with respect to the circumstances under which the Project would be undertaken. Since the EIR was certified on January 22, 2024, no new major



development has occurred around the Project Site. Land use patterns in the vicinity of the Project Site have remained the same and no major changes have occurred that would constitute changed circumstances for undertaking the Modified Alternative 2. Notably, the immediately adjacent uses surrounding the Project Site are the same as when the previous EIR was certified. The current circumstances in the immediate vicinity of the Project Site would not necessitate any changes to the conclusions presented in the Certified EIR.

#### **3.6.4 Any New Information Requiring New Analysis or Verification?**

There is no new information of substantial importance associated with the Modified Alternative 2 relative to hazards and hazardous materials that would show that: (1) the Modified Alternative 2 would have one or more significant effects not discussed in the Certified EIR; (2) significant effects previously examined will be substantially more severe than shown in the Certified EIR; (3) mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents declined to adopt the mitigation measure or alternative; or (4) mitigation measures or alternatives which are considerably different from those analyzed in the Certified EIR would substantially reduce one or more significant effects on the environment, but the project proponents declined to adopt the mitigation measure or alternative.

#### **3.6.5 EIR's Mitigation Measures Addressing Impact**

The following mitigation measures set forth in the Certified EIR and the associated MMRP to address hazards and hazardous material impacts would be implemented as part of the Modified Project. No additional mitigation measures are required, as no new significant hazards and hazardous material impacts would result from implementation of the Modified Project.

**HAZ-MM-1: Health and Safety Plan.** The construction contractor(s) shall prepare and implement site-specific Health and Safety Plans (HASP) in accordance with 29 CFR 1910.120 to protect construction workers and the public during all excavation and grading activities, due to the potential to encounter TPH diesel, TPH oil, TPH gasoline, SVOCs, and total metals during construction. This HASP shall be submitted to the LADBS for review prior to commencement of demolition and construction activities and as a condition of the grading, construction, and/or demolition permit(s). The HASP shall include, but is not limited to, the following elements:

- Designation of a trained, experienced site safety and health supervisor who has the responsibility and authority to develop and implement the site HASP;
- A summary of all potential risks to demolition and construction workers and maximum exposure limits for all known and reasonably foreseeable site chemicals;
- Specified personal protective equipment and decontamination procedures, if needed;
- Emergency procedures, including route to the nearest hospital; and

Procedures to be followed in the event that evidence of potential soil contamination (such as soil staining, noxious odors, debris or buried storage containers) is encountered. These procedures shall be in accordance with hazardous waste operations regulations and specifically include, but are not limited to, the following: immediately stopping work in the vicinity of the unknown

hazardous materials release, and retaining a qualified environmental firm to perform sampling and remediation, as needed.

**HAZ-MM-2: Soil and Groundwater Management Plan.** In support of the HASP described above in Mitigation Measure HAZ-MM-1, the contractor(s) shall develop and implement a Soil and Groundwater Management Plan (SGMP) that includes a materials disposal plan specifying how the construction contractor(s) will remove, handle, transport, and dispose of all excavated materials and dewatering effluent in a safe, appropriate, and lawful manner. The SGMP shall include the following, at a minimum:

- Site description, including the hazardous materials that may be encountered.
- Roles and responsibilities of onsite workers, supervisors, and the regulatory agency.
- Training for site workers focused on the recognition of and response to encountering hazardous materials.
- Protocols for the materials (soil and/or dewatering effluent) testing, handling, removing, transporting, and disposing of all excavated materials and dewatering effluent in a safe, appropriate, and lawful manner.
- Confirmation sampling to verify that the remaining soil and/or groundwater at the site does not have chemical concentrations above screening levels for the applicable planned land use.
- Identification of licensed disposal sites permitted to accept the waste materials.
- Reporting requirement to the overseeing regulatory agency, documenting that site activities were conducted in accordance with the SGMP.

The SGMP shall include a groundwater dewatering control and disposal plan specifying how groundwater (dewatering effluent), if encountered, will be handled and disposed of in a safe, appropriate, and lawful manner. The groundwater portion of the SGMP shall include the following, at a minimum:

- The locations at which groundwater dewatering is likely to be required.
- Test methods to analyze groundwater for hazardous materials.
- Appropriate treatment and/or disposal methods.

This SGMP shall be submitted to the LADBS for review prior to commencement of demolition and construction activities and as a condition of the grading, construction, and/or demolition permit(s). Contract specifications shall mandate full compliance with all applicable local, state, and federal regulations related to the identification, transportation, and disposal of hazardous materials, including those encountered in excavated soil and dewatering effluent.

**HAZ-MM-3:** Prior to construction of the Deck and any associated soil disturbing activities at the Railway Properties, the construction contractor shall retain and consult a qualified environmental professional to conduct a soil sampling assessment, in accordance with applicable regulations. It is anticipated that the soil samples would be analyzed for TPH gasoline, TPH diesel, TPH oil,

SVOCs, and total metals. While the Railway Properties are not within a Methane Buffer Zone, methane/soil gas testing shall also be conducted as part of the soils sampling assessment. The soil analytical results shall be compared to applicable screening levels established by the appropriate regulating agencies. In the event that methane gas is detected above the laboratory RL, construction of the Project with the Deck would occur per the provisions of the LAMC, Division 71 Methane Mitigation Standards Ordinance.

### 3.6.6 Conclusion

Based on the Above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

## 3.7 HYDROLOGY AND WATER QUALITY

Thresholds (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
<b>HYDROLOGY AND WATER QUALITY:</b> Would the project:					
(a) Violate any water quality standards or waste discharge requirements?	Less than Significant with Mitigation	No	No	No	Yes
(b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	Less than Significant	No	No	No	No
(c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	Less than Significant	No	No	No	No
(i) Result in substantial erosion or siltation on- or off-site;	Less than Significant	No	No	No	No
(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	Less than Significant	No	No	No	No
(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	Less than Significant	No	No	No	No
(iv) Impede or redirect flood flows?	Less than Significant	No	No	No	No
(d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	Less than Significant	No	No	No	No
(e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	Less than Significant with Mitigation	No	No	No	Yes

### **3.7.1 Impact Determination in the EIR**

The EIR concluded that the Original Project and Original Alternative 2 under thresholds (a) and (e) could result in a potentially significant surface and groundwater water quality impacts during construction activities,. These impacts would be reduced to a less than significant level with implementation of Mitigation Measure HAZ-MM-2 under the Original Project and the Original Alternative 2. With regards to thresholds (b) through (d), the EIR concluded that impacts would be less than significant under both the Original Project and the Original Alternative 2.

### **3.7.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?**

**Thresholds (a) and (e).** Modified Alternative 2 would require the same depth and volume of excavation for the subterranean parking levels as the Original Alternative 2. Modified Alternative 2, as with the Original Alternative 2, could encounter contaminated soils during construction, and water quality impacts would be potentially significant. Modified Alternative 2, as with Original Alternative 2, would be required to implement Mitigation Measure HAZ-MM-2 to reduce impacts regarding water quality to less-than-significant levels. The State of California requires that all projects more than one acre in area implement a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP specifies best management practices (BMPs) and erosion control measures to be used during construction to prevent pollution, to contain and treat, as necessary, stormwater or construction watering on the Project Site so runoff does not impact off-site drainage facilities or receiving waters. Additionally, Modified Alternative 2, as with the Original Alternative 2, would incorporate similar Low Impact Development (LID) BMPs to improve the quality of stormwater runoff discharged from the Project Site. As with the Original Alternative 2, impacts related to hydrology and water quality under Modified Alternative 2 would be less than significant after mitigation, as applicable, and would be similar to the Original Alternative 2. The EIR found that Original Alternative 2 would result in greater construction-related water quality and drainage pattern impacts than the Original Project, but less construction-related water quality and drainage pattern impacts than the Original Project with the Deck Concept. Other impacts under the Original Alternative 2 related to operational water quality impacts, groundwater recharge and conflicts with water quality control plans or sustainable groundwater management plans were found to be similar to the Original Project and the Original Project with the Deck Concept.

### **3.7.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?**

No substantial changes have occurred with respect to the circumstances under which the Project would be undertaken. Since the EIR was certified on January 22, 2024, no new major development has occurred around the Project Site. Land use patterns in the vicinity of the Project Site have remained the same and no major changes have occurred that would constitute changed circumstances for undertaking the Modified Alternative 2. Notably, the immediately adjacent uses surrounding the Project Site are the same as when the previous EIR was certified. The current circumstances in the immediate vicinity of the Project Site would not necessitate any changes to the conclusions presented in the Certified EIR.

### 3.7.4 Any New Information Requiring New Analysis or Verification?

There is no new information such as new cumulative projects, studies, plans, policies or regulations of substantial importance associated with the Modified Alternative 2 relative to hydrology and water quality that would show that: (1) the Modified Alternative 2 would have one or more significant effects not discussed in the Certified EIR; (2) significant effects previously examined will be substantially more severe than shown in the Certified EIR; (3) mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the Project, but the Project proponents declined to adopt the mitigation measure or alternative; or (4) mitigation measures or alternatives which are considerably different from those analyzed in the Certified EIR would substantially reduce one or more significant effects on the environment, but the Project proponents declined to adopt the mitigation measure or alternative.

### 3.7.5 EIR’s Mitigation Measures Addressing Impact

Refer to Mitigation Measure HAZ-MM-2. No additional mitigation measures are required, as no new significant hydrology and water quality impacts would result from implementation of the Modified Project.

### 3.7.6 Conclusion

Based on the Above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

## 3.8 LAND USE AND PLANNING

Thresholds (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR’s Mitigation Measures Addressing Impacts
<b>LAND USE AND PLANNING:</b> Would the project:					
(a) Physically divide an established community?	Less than Significant	No	No	No	No
(b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	Less than Significant	No	No	No	No

### 3.8.1 Impact Determination in the EIR

With regards to land use and planning, the EIR concluded that impacts would be less than significant under the Original Project and the Original Alternative 2.

### **3.8.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?**

**Threshold (a).** As with the Original Alternative 2, Modified Alternative 2 would open the Project Site to north-south and east-west access between the Arts District neighborhoods north and south of the Project Site and between the neighborhoods west of the Project Site and the Los Angeles River and Boyle Heights to the east; expand pedestrian access to future Metro transit projects; and improve access from the Mesquit Street Level to the 7th Street Level and Deck via the Entry Plazas. Implementation of Modified Alternative 2 would, similar to the Original Alternative 2, increase the direct connections through the Project Site and allow for connectivity between the neighborhoods, and thus would not physically divide an established community. Impacts related to potential division of an established community under both the Original Alternative 2 and Modified Alternative 2 would be less than significant and similar. Impacts under Modified Alternative 2 would be similar to the Original Alternative 2, which were found to be similar to the Original Project and the Original Project with the Deck Concept in the Draft EIR.

**Threshold (b).** Modified Alternative 2 would not conflict with applicable plans adopted to avoid or mitigate environmental effects. Modified Alternative 2 would develop 895 residential units within an HQTAs and TPA, including affordable units. Modified Alternative 2 would, therefore, not conflict with plans and policies that support greater housing densities, including affordable housing within an HQTAs and a TPA, and would therefore be consistent with plans and policies that would promote a reduction in VMT and air pollution. Modified Alternative 2 would be consistent with the same applicable policies and plans of the 2020–2045 RTP/SCS, Framework Element, Central City North Community Plan, RIO District Ordinances and the LAMC as the Original Alternative 2. As with the Original Alternative 2, because Modified Alternative 2 would support policies and plans to increase housing, residents, and co-located commercial uses within HQTAs and TPAs, impacts with respect to conflict with applicable plans under Modified Alternative 2 would be less than significant. Impacts under Modified Alternative 2 would be similar to the Original Alternative 2, which were found to be similar to the Original Project and the Original Project with the Deck Concept in the Draft EIR.

### **3.8.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?**

No substantial changes have occurred with respect to the circumstances under which the Project would be undertaken. Since the EIR was certified on January 22, 2024, no new major development has occurred around the Project Site. Land use patterns in the vicinity of the Project Site have remained the same and no major changes have occurred that would constitute changed circumstances for undertaking the Modified Alternative 2. Notably, the immediately adjacent uses surrounding the Project Site are the same as when the previous EIR was certified. The current circumstances in the immediate vicinity of the Project Site would not necessitate any changes to the conclusions presented in the Certified EIR.

### **3.8.4 Any New Information Requiring New Analysis or Verification?**

With regard to new plans, the DTLA 2040 Plan and associated updates to the City's Zoning Code is now pending City Council review, but are not yet fully adopted or effective. In addition, SCAG's 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy (2024-2050 RTP/SCS) known as Connect SoCal, similar to its 2019-2045 RTP, includes policies that support improved mobility, accessibility, reliability, and travel safety for people and goods, reducing GHG emissions and improving air quality, and encouraging development of diverse housing types in areas that are supported by multiple transportation options. As with the Original Project and the Original Alternative 2, the Modified Alternative 2 would support the SoCal Connect policies through features and characteristics such as: siting a high density mixed-use development within a Transit Priority Area (TPA) and HQTAs; providing bicycle parking spaces, bike lockers, and showers in accordance with the LAMC; facilitating active transportation with publicly accessible open space; facilitating connections to Downtown Los Angeles and adjacent communities; compliance with LEED Silver certification or equivalent standards; provisions for on-site electric vehicle (EV) charging stations; incorporating green building features, such as heat reduction strategies, on-site recycling, use of materials meeting sustainability standards, and use of high efficiency fixtures, appliances, and heating, ventilation and air conditioning systems. As such, Modified Project would support an infill growth pattern near transit facilities that is encouraged by SCAG policies.

Otherwise, there is no new information such as new cumulative projects, studies, plans, policies or regulations of substantial importance associated with the Modified Alternative 2 relative to land use and planning that would show that: (1) the Modified Alternative 2 would have one or more significant effects not discussed in the Certified EIR; (2) significant effects previously examined will be substantially more severe than shown in the Certified EIR; (3) mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the Project, but the Project proponents declined to adopt the mitigation measure or alternative; or (4) mitigation measures or alternatives which are considerably different from those analyzed in the Certified EIR would substantially reduce one or more significant effects on the environment, but the Project proponents declined to adopt the mitigation measure or alternative.

### **3.8.5 EIR's Mitigation Measures Addressing Impact**

None required.

### **3.8.6 Conclusion**

Based on the Above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

### 3.9 NOISE

Thresholds (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
<b>NOISE:</b> Would the project:					
(a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Significant and Unavoidable (Construction)	No	No	Yes	Yes
(b) Generation of excessive groundborne vibration or groundborne noise levels?	Significant and Unavoidable (Construction)	No	No	Yes	Yes
(c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	No Impact	No	No	No	No

#### 3.9.1 Impact Determination in the EIR

With regards to threshold (a), the EIR concluded that impacts would be significant and unavoidable during the construction phase of both the Original Project and the Original Alternative 2, even with implementation of Mitigation Measures NOISE-MM-1 through NOISE-MM-3. During operations, potentially significant impacts during the operational phase associated with amplified speakers in outdoor spaces would be reduced to a less than significant level with implementation of Mitigation Measures NOISE-MM-4 and NOISE-MM-5 under both the Original Project and the Original Alternative 2. With regards to threshold (b), the EIR concluded that impacts would be significant and unavoidable during the construction phase under both the Original Project and the Original Alternative 2, even with implementation of Mitigation Measures NOISE-MM-6 through NOISE-MM-9. During operations, less than significant vibration impacts would occur under the Original Project and the Original Alternative 2. Under threshold (c), neither the Original Project nor the Original Alternative 2 would result in any impact regarding noise impacts within the vicinity of a private airstrip or an airport land use plan.

#### 3.9.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

**Threshold (a).** Modified Alternative 2 would require the same types of construction activities as the Original Alternative 2 and as such, off-site construction traffic noise impacts under Modified Alternative 2 could be potentially significant, but Mitigation Measure NOISE-MM-3 would reduce off-site construction traffic noise impacts to less-than-significant levels. Similar to the Original Alternative 2, on-site construction activities for Modified Alternative 2 would result in a temporary



increase in ambient noise that would exceed thresholds of significance at R1, R2, R3, and R4, and would implement Mitigation Measures NOISE-MM-1 and NOISE-MM-2 to reduce impacts at all receptors. This would reduce impacts at R2 and R3 to less-than-significant levels. However, similar to the Original Alternative 2, on-site construction noise impacts under Modified Alternative 2 would remain significant and unavoidable at R1 and R4. While Modified Alternative 2 would have similar maximum daily noise levels as the Original Alternative 2, the duration of construction activity under Modified Alternative 2 would be shorter than the Original Alternative 2 due to changes in building design and construction, specifically reduced concrete framing. For this reason, impacts related to construction noise would be less in duration under Modified Alternative 2 than under the Original Alternative 2.

As with the Original Alternative 2, operation of Modified Alternative 2 would increase off-site traffic compared to existing conditions and generate on-site composite noise associated with fixed equipment, vehicle activity, heliport operation, and human outdoor activity. Both Modified Alternative 2 and the Original Alternative 2 would have similar outdoor amplification sound systems for the outdoor open space areas, and impacts related to daytime and nighttime operation of outdoor spaces would be less than significant levels with implementation of Mitigation Measures NOISE-MM-4 and NOISE-MM-5 for both the Original Alternative 2 and Modified Alternative 2. However, Modified Alternative 2 would result in less off-site traffic (reduced trips and VMT) than the Original Alternative 2 (see Attachment A, Modified Alternative 2 Traffic Memorandum). Because of reduced traffic compared to the Original Alternative 2, operational noise impacts under Modified Alternative 2 would be less than the Original Alternative 2.

Based on the above, construction and operational impacts under Modified Alternative 2 would be less than the Original Alternative 2, which were found to be greater than the Original Project and less than the Original Project with the Deck Concept in the Draft EIR.

**Threshold (b).** Similar to the Original Alternative 2, construction of Modified Alternative 2 would generate groundborne construction vibration during construction activities when heavy construction equipment is used. Because the construction activities under Modified Alternative 2 would be similar to the Original Alternative 2, Modified Alternative 2 would have similar impacts associated with structural damage from on-site construction activities for Receptors V1 (multi-family residential use to the west of the Project Site at 2101 E. 7th Street) and V6 (7th Street Bridge). As with the Original Alternative 2, Modified Alternative 2 would implement Mitigation Measures NOISE-MM-6 through NOISE-MM-9 to attempt to reduce impacts. Impacts with regard to structural damage for Receptor V6 would be mitigated to a less-than-significant level except for temporary shoring activities. However, because Receptor V1 is a privately owned structure, inspections and repair pursuant Mitigation Measure NOISE-MM-8 would require the consent of the property owner, who may not agree. Thus, impacts to receptor V1 would be significant and unavoidable should consent for inspections and repairs not be granted. Therefore, construction vibration impacts for building damage under Modified Alternative 2 would be significant and unavoidable, and would be similar to the Original Alternative 2 since the extent of construction vibration and shoring activities would be similar.

Regarding human annoyance, the estimated vibration levels due to maximum construction activity under the Original Alternative 2 and Modified Alternative 2 would exceed the significance criteria at V1, and impacts would be potentially significant. As with the Original Alternative 2, Modified Alternative 2 would implement Mitigation Measures NOISE-MM-6 through NOISE-MM-9, but

construction vibration impacts would remain significant and unavoidable. Vibration impacts with respect to human annoyance that would result from temporary and intermittent off-site vibration from construction trucks traveling along the local roadway network would be less than significant. While Modified Alternative 2 would result in a similar maximum daily vibration levels, the duration of construction activity under Modified Alternative 2 would be less than the Original Alternative 2. Because of the shorter construction duration of Modified Alternative 2, impacts related to construction vibration for human annoyance would be less under Modified Alternative 2 compared to the Original Alternative 2.

Overall, construction-related vibration impacts under Modified Alternative 2 would be less than the Original Alternative 2, which were found to be greater than the Original Project and less than the Original Project with the Deck Concept in the Draft EIR.

During operation, Modified Alternative 2, as with the Original Alternative 2, would include typical commercial-grade stationary mechanical and electrical equipment, which would produce vibration at low levels that would not cause damage or annoyance impacts to on-site or off-site environment. Primary sources of transient vibration would include vehicle circulation within the proposed parking areas, which would be confined to the immediate area and would not be expected to be perceptible off the Project Site. It is anticipated that mechanical equipment under Modified Alternative 2 would be located in similar locations as for the Original Alternative 2. Therefore, as with the Original Alternative 2, groundborne vibration from the operation of such mechanical equipment under Modified Alternative 2 would not impact any of the off-site sensitive receptors. Operational vibration impacts under Modified Alternative 2 would be similar to the Original Alternative 2, which were found to be similar to the Original Project, and the Original Project with the Deck Concept, in the Draft EIR.

**Threshold (c).** The Project Site is not within an airport land use plan, and it is not within two miles of a public airport or public use airport. The nearest airport is the Hawthorne Municipal Airport located over 10 miles southwest of the Project Site. No impacts would occur, and impacts under Modified Alternative 2 would be the same Original Alternative 2.

### **3.9.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?**

No substantial changes have occurred with respect to the circumstances under which the Project would be undertaken. Since the EIR was certified on January 22, 2024, no new major development has occurred around the Project Site. Land use patterns in the vicinity of the Project Site have remained the same and no major changes have occurred that would constitute changed circumstances for undertaking the Modified Alternative 2. Notably, the immediately adjacent uses surrounding the Project Site are the same as when the previous EIR was certified. The current circumstances in the immediate vicinity of the Project Site would not necessitate any changes to the conclusions presented in the Certified EIR.

### **3.9.4 Any New Information Requiring New Analysis or Verification?**

There is no new information such as new cumulative projects, studies, plans, policies or regulations of substantial importance associated with the Modified Alternative 2 relative noise that would show that: (1) the Modified Alternative 2 would have one or more significant effects not

discussed in the Certified EIR; (2) significant effects previously examined will be substantially more severe than shown in the Certified EIR; (3) mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the Project, but the Project proponents declined to adopt the mitigation measure or alternative; or (4) mitigation measures or alternatives which are considerably different from those analyzed in the Certified EIR would substantially reduce one or more significant effects on the environment, but the Project proponents declined to adopt the mitigation measure or alternative.

### **3.9.5 EIR's Mitigation Measures Addressing Impact**

The following mitigation measures set forth in the Certified EIR and the associated MMRP to address noise impacts would be implemented as part of the Modified Project. No additional mitigation measures are required, as no new significant noise impacts would result from implementation of the Modified Project.

**NOISE-MM-1: Noise Barriers.** Prior to issuance of any demolition, grading or building permit, the Project shall provide temporary ground-level 20-foot-tall construction noise barriers equipped with noise blankets or equivalent noise reduction materials rated to achieve sound level reductions of at least 15 dBA between the Project Site and the ground-level and second-levels at sensitive receptor location R1 and between the Project Site and R4 (if R4, the future 6th Street PARC is constructed and operational at the time of Project construction). These temporary noise barriers shall be used to block the line-of-sight between the construction equipment and the noise-sensitive receptor(s) during the duration of construction activities. The Project applicant shall provide documentation prepared by a qualified noise consultant verifying compliance with this measure.

**NOISE-MM-2: Construction Equipment Noise Shielding and Muffling Devices.** Contractors shall ensure that all construction equipment, fixed or mobile, are equipped with properly operating and maintained noise shielding and muffling devices, consistent with manufacturers' standards. Prior to the issuance of demolition permits, certification of muffler installation shall be submitted to the City for review. The construction contractor shall keep documentation onsite demonstrating that the equipment has been maintained in accordance with the manufacturers' specifications. Most of the noise from construction equipment originates from the intake and exhaust portions of the engine cycle. According to FHWA, use of adequate mufflers systems can achieve reductions in noise levels of up to 10 dBA. The contractor shall use muffler systems that provide a minimum reduction of 8 dBA compared to the same equipment without an installed muffler system, reducing maximum construction noise levels. Contractors shall include the muffler requirements in contract specifications. The contractor shall also keep documentation on-site prepared by a noise consultant verifying compliance with this measure.

**NOISE-MM-3: Truck Deliveries.** Contractors shall include in all vendor and concrete supplier contracts a requirement for truck deliveries to and from the Project Site to prohibit travel on Jesse Street between Mateo Street and Santa Fe Avenue or on Mateo Street between 4th Place and Willow Street when traveling to or from the Project Site during Project demolition, grading and construction. The construction contractor shall provide a flag person along Jessie Street near the segment between Mateo Street and Santa Fe Avenue and along Mateo Street between 4th Place

and Willow Street to ensure that all concrete and vendor trucks do not travel along both of these identified segments.

**NOISE-MM-4: Amplified Speakers – All Outdoor Spaces.** Outdoor amplified sound systems, if any, will be limited to a sound level equivalent to 85 dBA ( $L_{eq-1hr}$ ) measured at a distance of 25 feet from the amplified speaker sound system. A qualified noise consultant shall provide written documentation that the design of the system complies with the maximum noise level. Compliance will be ensured through pre-performance noise tests/measurements for performances or ambient music speakers with potential to exceed the sound level, along with any necessary adjustments to the location and nature of proposed performances or ambient music speakers. Speakers will be downward or inward facing and shielded from off-site sensitive uses. The Applicant or Operator shall prepare standard operating procedures for the use of amplified speakers at this location consistent with this requirement. The standard operating procedures shall be provided to the City and the Los Angeles Police Department (LAPD) prior to the issuance of a building permit for the Project and posted onsite in the event of LAPD response to noise complaints.

**NOISE-MM-5: Amplified Speakers – River Balcony North.** Amplified speaker volumes within the River Balcony North area shall be limited to a level that would not exceed 75 dBA at a distance of 25 feet from the speaker. A qualified noise consultant shall provide written documentation that the design of the system complies with the maximum noise level. Compliance will be ensured through pre-performance noise tests/measurements for performances or ambient music speakers with potential to exceed the sound level, along with any necessary adjustments to the location and nature of proposed performances or ambient music speakers. Speakers will be downward or inward facing and shielded from off-site sensitive uses. The Applicant or Operator shall prepare standard operating procedures for the use of amplified speakers at this location consistent with this requirement. The standard operating procedures shall be provided to the City and Los Angeles Police Department (LAPD) prior to the issuance of a building permit for the Project and posted onsite in the event of LAPD response to noise complaints.

**NOISE-MM-6: Construction Vibration (Except Shoring).** The operation of construction equipment that generates high levels of vibration, such as large bulldozers, loaded trucks, jackhammers, and small bulldozers shall be prohibited within 21 feet, 19 feet, 12 feet, and 3 feet, respectively, of receptor V1 (multi-family residential uses located at 2101 E. 7th Street). The use of large bulldozers and loaded trucks shall be prohibited within 8 feet, the use of jackhammers shall be prohibited within 5 feet, and the use of small bulldozers shall be prohibited within 1 foot of receptor V6 (the 7th Street Bridge). The contractor(s) shall require and document compliance with the minimum allowable setbacks in a construction vibration management plan, which shall be provided to the City prior to issuance of a demolition permit. The construction vibration management plan shall detail the types of equipment to be used during demolition, grading, and building construction, estimated vibration velocities, and distance to vibration receptors V1 and V6. Equipment and or alternative construction techniques to be used within the required setbacks for large bulldozers, loaded trucks, jackhammers, and small bulldozers shall be identified to ensure that vibration velocities will not exceed thresholds for potential structural damage. This measure does not apply to temporary shoring activities and shoring infrastructure that must be installed to provide adequate physical support for subterranean excavation.

**NOISE-MM-7: Construction Vibration (Shoring).** The following procedures are required for shoring system design and monitoring of excavation, grading, and shoring activities:

- Prior to the issuance of a shoring or grading permit, excavation and shoring plans for temporary shoring walls shall be prepared by a California Registered Civil Engineer experienced in the design and construction of shoring systems. The shoring systems shall be selected and designed in accordance with all current code requirements, industry best practices, and the recommendations of the Project Geotechnical Engineer. Maximum allowable lateral deflections for the Project Site are to be developed by the Project Geotechnical Engineer in consideration of adjacent structures, property, and public rights-of-way. These deflection limits shall be prepared in consideration of protecting the adjacent older structure at receptor location V1 (multi-family residential uses located at 2101 E. 7th Street) and the historic bridge at receptor location V6 (the 7th Street Bridge). The shoring engineer shall produce a shoring design, incorporating tie-backs, soldier piles, walers, or other appropriate supports that is of sufficient capacity and stiffness to meet or exceed the Project strength and deflection requirements. Calculations shall be prepared by the shoring engineer showing the anticipated lateral deflection of the shoring system and its components and demonstrating that these deflections are within the allowable limits. Where tie-back anchors shall extend across property lines or encroach into the public rights-of-way, appropriate notification and approval procedures shall be followed. The final excavation and shoring plans shall include all appropriate details, material specifications, testing and special inspection requirements and shall be reviewed by the Project Geotechnical Engineer for conformance with the design intent and submitted to LADBS for review and approval during the Grading Permit application submission. The Project Geotechnical Engineer shall provide on-site observation during the excavation and shoring work.
- Appropriate parties, including but not limited to the lead Contractor, City of Los Angeles Public Works, and Los Angeles Department of Building and Safety, shall be notified immediately and corrective steps shall be identified and implemented if maximum allowable lateral deflections for the Project Site that are developed by the Project Geotechnical Engineer are exceeded, or if new cracks, distress, or other damage are observed in adjacent structures, sidewalks, buildings, utilities, façades, etc.
- Foundation systems shall be designed in accordance with all applicable loading requirements, including seismic, wind, settlement, and hydrostatic loads, as determined by the California Building Code and in accordance with the recommendations provided by the Project Geotechnical Engineer. Foundation systems are anticipated to consist of cast-in-place concrete mat foundations supported by cast-in-place concrete drilled shaft or auger cast piles. Driven (impact) piles shall not be used.

**NOISE-MM-8: Inspections.** Prior to the issuance of a demolition or building permit, the Applicant shall retain the services of a third party licensed building inspector or structural engineer to inspect and document (video and/or photographic) V1 (multi-family residential located at 2101 E. 7th Street) and V6 (7th Street Bridge) for the apparent physical condition of the building's readily-visible features. Inspection and documentation shall also be carried out by and in coordination with a qualified preservation consultant for the historic bridge at receptor location V6 (7th Street Bridge). Daily inspections shall occur when construction activities involving vibration-generating

equipment such as bulldozers, jackhammers, loaded trucks, and drill rigs are used within 21 feet of V1 and within 8 feet of V6. In the event that damage occurs due to construction vibration the adjacent older structure at receptor location V1 (multi-family residential uses) or the historic bridge at receptor location V6 (the 7th Street Bridge) based on assessment by the third-party inspector or engineer, the Applicant/or the Applicants designated representative, shall arrange for repairs during the construction phase. Such repairs, if needed shall be undertaken by a qualified contractor. Repair of historic features on the historic bridge at receptor V6 (the 7th Street Bridge) shall be performed in consultation with a qualified preservation consultant, and, if warranted, in a manner that meets the Secretary of the interior's Standards.

*Additional Requirements during Shoring.* Prior to the issuance of a demolition or building permit, the general contractor shall hire a California Registered Professional Engineer or California Professional Land Surveyor to prepare an Adjacent Structures Construction Monitoring Plan, subject to review and approval by LADBS, prior to initiation of any excavation and shoring activities to ensure the protection of the adjacent older structure at receptor location V1 (multi-family residential uses) and the historic bridge at receptor location V6 (the 7th Street Bridge) from damage due to settlement during excavation and shoring. The Adjacent Structures Construction Monitoring Plan shall be carried out by a California Professional Land Surveyor and establish survey markers and document and record through any necessary means, including video, photography, survey, etc. the initial positions of and existing cracks on the adjacent structures and facades to form a baseline for determining settlement or deformation. Upon installation of soldier piles, survey monuments shall be affixed to the tops of representative piles so that deflection can be measured. The shored excavation and adjacent structures, sidewalks, buildings, utilities, facades, cracks, etc. shall be visually inspected each day. Survey monuments shall be measured at critical stages of dewatering, excavation, shoring, and construction but shall not occur less frequently than once every 30 days. Reports shall be prepared by the California Professional Land Surveyor documenting the movement monitoring results. In the event that vibration or settlement due to excavation or construction activity causes damage requiring repairs to the adjacent older structure at receptor location V1 (multi-family residential uses) or the historic bridge at receptor location V6 (the 7th Street Bridge) based on assessment by the third-party inspector or engineer, the Applicant/or the Applicants designated representative, shall arrange for repairs during the construction phase. The repair work shall be performed by a qualified contractor. Repair of historic features on the historic bridge at receptor V6 (the 7th Street Bridge) shall be performed in consultation with a qualified preservation consultant and in accordance with the California Historical Building Code and the Secretary of the Interior's Standards, as appropriate. A log of all complaints submitted and actions taken to address those complaints shall be kept on site and shall be provided to the City prior to full build permit issuance/at the conclusion of demolition and shoring, and review by Office of Historic Resources (OHR) shall be required if any damage occurs related to the bridge.

**NOISE-MM-9: Construction Vibration (Human Annoyance).** Prior to the issuance of a demolition or building permit, to address potential vibration impacts regarding human annoyance, the Applicant shall designate a construction relations officer to serve as a liaison with the adjacent sensitive receptor location V1. The liaison shall be responsible for responding to concerns regarding vibration within 24 hours of receiving a complaint. The liaison shall respond to concerns by ensuring that steps are taken to reduce vibration levels at V1 (multi-family residential uses located at 2101 E. 7th Street) as deemed appropriate and safe by the on-site construction manager. Such steps could include substituting lower vibration generating equipment or activity, rescheduling of high vibration-generating construction activity, or other potential adjustments to the construction program to reduce vibration levels at the adjacent sensitive receptor location V1. A log of all complaints submitted and actions taken to address those complaints shall be kept on site and shall be provided to the City prior to full build permit issuance/at the conclusion of demolition and shoring.

### 3.9.6 Conclusion

Based on the Above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

## 3.10 POPULATION AND HOUSING

Thresholds (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
<b>POPULATION AND HOUSING:</b> Would the project:					
(a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	Less than Significant	No	No	Yes	No
(b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	Less than Significant	No	No	No	No

### 3.10.1 Impact Determination in the EIR

With regards to population and housing, the EIR concluded that impacts would be less than significant for the Original Project and the Original Alternative 2.

### 3.10.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

**Thresholds (a)-(b).** Modified Alternative 2 would increase occupancy and use of the existing Project Site. The projected residential population and housing stock under Modified Alternative 2 are summarized **Table 2**, *Estimate of Modified Alternative 2 Population*. Modified Alternative 2's projected employment is summarized in **Table 3**, *Estimate of Modified Alternative 2's Employment*.

**TABLE 2  
ESTIMATE OF MODIFIED ALTERNATIVE 2 POPULATION**

	Total Housing Units	Average Household Size <sup>a</sup>	Total Population
Modified Alternative 2	895	2.41	2,157
Original Alternative 2	420	2.41	1,103
Difference	+475		+1,054

NOTE(S):

<sup>a</sup> Based on 2018 Census American Community Survey 5-Year Estimate data (2014–2018).

SOURCE: ESA, 2024

Modified Alternative 2 would provide 895 residential units, generating approximately 2,157 new residents. Modified Alternative 2 would generate 2,868 net new employees. By comparison, the Original Alternative 2 would generate 420 new residents and 4,292 net new employees. Modified Alternative 2's population increase of 2,157 new residents would represent 0.83 percent of SCAG's 2017–2026 population growth projection of 259,913 and approximately 0.26 percent of SCAG's 2017–2045 population growth projection of 808,620. Modified Alternative 2's 2,868 net new employees would represent approximately 3.21 percent of SCAG's 2017–2026 employment growth projection of 89,254 and approximately 1.03 percent of SCAG's 2017–2045 employment growth projection of 277,682.<sup>3</sup> Modified Alternative 2, as with the Original Alternative 2, would not exceed SCAG's growth projections, would help the City meet its housing obligation under SCAG's RHNA allocation, and would provide the type of transit oriented development encouraged in the City's General Plan and SCAG 2020–2045 RTP/SCS policies. Because there are no existing housing units on the Project Site, no existing residences would be displaced. As such, Modified Alternative 2, as with the Original Alternative 2, would result in a less than significant population, housing, and employment impacts. As SCAG population and housing projections would not be exceeded, impacts with respect to substantial unplanned population growth under Modified Alternative 2 would be less than significant and similar to the Original Alternative 2, which were found to be similar to the Original Project and the Original Project with the Deck Concept in the Draft EIR.

<sup>3</sup> Population increase calculations:  $2,157 \div 259,913 = 0.83\%$ ;  $2,157 \div 808,620 = 0.26\%$ . Employment increase calculations:  $2,868 \div 89,254 = 3.21\%$ ;  $2,868 \div 277,682 = 1.03\%$ .



**TABLE 3  
ESTIMATE OF MODIFIED ALTERNATIVE 2'S EMPLOYMENT**

<b>Use</b>	<b>Amount</b>	<b>Employment Generation Factor<sup>a</sup></b>	<b>Number of Employees<sup>b</sup></b>
Office	676,437 sf	4 emp/ksf	2,706
Retail	14,345 sf	2 emp/ksf	29
Restaurant	28,688 sf	4 emp/ksf	115
Hotel	271 rms 200,210 sf	0.5 emp/rm	136
Studio/Gallery	35,515 sf	1 emp/ksf	36
Gym	34,000 sf	1 emp/ksf	34
Elementary School	30,000 sf (300 students)	0.1 emp/student	30
<i>Proposed Subtotal</i>			<b>3,086</b>
<b>Existing Uses</b>			
Freezer/Cooler	161,854 sf	1 emp/ksf	162
Office	11,157 sf	4 emp/ksf	45
Dry Storage	32,382 sf	0.33 emp/ksf	11
<i>Existing Subtotal</i>			<b>218</b>
<b>Modified Alternative 2 Net New Employees</b>			<b>2,868</b>
<b>Original Alternative 2 New Employees</b>			<b>4,292</b>
<b>Difference</b>			<b>-1,424</b>

NOTE(S): sf = SQUARE FEET; rm = ROOM; emp = EMPLOYEE

<sup>a</sup> The employee generation factors are taken from Table 1, Land Use and Trip Generation Base Assumptions, from the City of Los Angeles Vehicle Miles Traveled (VMT) Calculator Documentation, Version 1.3, provided by the LADOT and Los Angeles Department of City Planning.

<sup>b</sup> Totals are rounded.

<sup>c</sup> Number of Original Alternative 2 employees from Table V-4, *Estimate of Alternative 2's Employment*, in the Certified EIR.

SOURCE: ESA, 2024

### 3.10.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

No substantial changes have occurred with respect to the circumstances under which the Project would be undertaken. Since the EIR was certified on January 22, 2024, no new major development has occurred around the Project Site. Land use patterns in the vicinity of the Project Site have remained the same and no major changes have occurred that would constitute changed circumstances for undertaking the Modified Alternative 2. Notably, the immediately adjacent uses surrounding the Project Site are the same as when the previous EIR was certified. The current

circumstances in the immediate vicinity of the Project Site would not necessitate any changes to the conclusions presented in the Certified EIR.

#### **3.10.4 Any New Information Requiring New Analysis or Verification?**

With regard to new plans, SCAG's 2024–2045 RTP/SCS, known as Connect SoCal, includes SCAG's updated population, households and employment projections for the region as well as local jurisdictions up through 2050. As with the Draft EIR's analysis of SCAG's growth projections which are forecasted through 2045, the Modified Project's contribution of population, households and employment would be a small fraction of and well within the 2050 buildout projections. Further, the Project's contribution to households and population growth would continue an infill growth pattern near transit facilities that is encouraged locally in the City's plans and regionally by SCAG policies. As such, the Modified Project would not result in substantial population growth relative to that projected by SCAG's Connect SoCal Plan. Otherwise, there is no new information such as new cumulative projects, studies, plans, policies or regulations of substantial importance associated with the Modified Alternative 2 relative to population and housing that would show that: (1) the Modified Alternative 2 would have one or more significant effects not discussed in the Certified EIR; (2) significant effects previously examined will be substantially more severe than shown in the Certified EIR; (3) mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the Project, but the Project proponents declined to adopt the mitigation measure or alternative; or (4) mitigation measures or alternatives which are considerably different from those analyzed in the Certified EIR would substantially reduce one or more significant effects on the environment, but the Project proponents declined to adopt the mitigation measure or alternative.

#### **3.10.5 EIR's Mitigation Measures Addressing Impact**

None required.

#### **3.10.6 Conclusion**

Based on the Above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

### 3.11 PUBLIC SERVICES

Thresholds (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
<b>PUBLIC SERVICES:</b> Would the project:					
(a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:					
i) Fire protection?	Less than Significant	No	No	Yes	No
ii) Police protection?	Less than Significant	No	No	Yes	No
iii) Schools?	Less than Significant	No	No	Yes	No
iv) Parks?	Less than Significant	No	No	Yes	No
v) Libraries?	Less than Significant	No	No	Yes	No
(b) Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	Less than Significant	No	No	Yes	No
(c) Would the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	Less than Significant	No	No	Yes	No

#### 3.11.1 Impact Determination in the EIR

With regards to public services, the EIR concluded that impacts would be less than significant for the Original Project and the Original Alternative 2.

#### 3.11.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

**Threshold (a.i).** Modified Alternative 2, as with the Original Alternative 2, would involve construction activities and intensify the use of the Project Site so that it would increase demand on fire protection and emergency medical services, as well as potentially affect emergency access. Modified Alternative 2, as with the Original Alternative 2, would incorporate Project Design Feature TRAF-PDF-1 to provide a Construction Traffic Management Plan to improve vehicular access around the construction site. Project Design Feature TRAF-PDF-2 would identify and enforce parking location requirements for construction workers. The implementation of these

Project Design Features would facilitate emergency access. As such, similar to the Original Project, construction under Modified Alternative 2 would result in less-than-significant impacts with respect to emergency response times and emergency access.

During operation, Modified Alternative 2 would result in a population increase of 2,157 new residents and 2,868 net new employees, for a total service area increase of 5,025 in the service population. By comparison, the Original Alternative 2 would result in a population increase of 1,013 residents and 4,391 new employees, for a total service area increase of 5,404 persons. Modified Alternative 2, as with the Original Alternative 2, would comply with the applicable Occupational Safety and Health Administration (OSHA), Building Code, Fire Code, other LAMC, and LAFD requirements and recommendations, which would reduce demand on LAFD facilities and equipment without creating the need for new or expanded fire facilities. In addition, the Project Site is located within a highly urbanized area accessed via an established street system. Fire Station 17 is located 1.032 miles from the Project Site and Fire Station 9 is located 1.632 miles from the Project Site, none of the stations that would serve the Project Site meet the LAFD distance standard to the Project Site of 1 mile for an Engine Company or 1.5 miles for a Truck Company. However, both the Original Alternative 2 and Modified Alternative 2 would include an automatic sprinkler system that would support compliance with the relevant requirements in Section 57.107.6 of the Fire Code. The LAFD recommended a variety of fire prevention and protection features regarding building identification, emergency access lanes, building setbacks, and private roadway widths that will be incorporated into Modified Alternative 2. Additionally, plans and specifications would be submitted to LAFD prior to the provision of necessary permits for development. The inclusion of these recommendations would reduce potential impacts.

Furthermore, Modified Alternative 2, as with the Original Alternative 2, would be required to upgrade the nearby fire-flow infrastructure to have available flow to serve the Project Site. With the inclusion of these system upgrades, the hydrants would have adequate fire flow available to meet the flow required for Modified Alternative 2, similar to the Original Alternative 2. As such, Modified Alternative 2, as with the Original Alternative 2, would not result in substantial adverse physical impacts associated with the provision of or need for new or altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives. Impacts under Modified Alternative 2, as with the Original Alternative 2, would be less than significant. Because Modified Alternative 2 would decrease Project Site service population (employees plus residents) compared to the Original Alternative 2, impacts related to fire protection services under Modified Alternative 2 would be incrementally less than the Original Alternative 2, which were found to be greater than the Original Project and the Original Project with the Deck Concept in the Draft EIR. However, neither the Original Alternative 2 or Modified Alternative 2 would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts. As such, impacts in this regard are considered to be similar between the Original Alternative 2 and the Modified Alternative 2 to those analyzed in the Draft EIR.

**Threshold (a.ii).** Modified Alternative 2, as with the Original Alternative 2, would result in construction activities that could affect emergency access and increase demand for police protection services. As with the Original Alternative 2, the construction of Modified Alternative 2 could increase potential demand for LAPD services related to theft or vandalism and increased

worker activity, as well as construction traffic that could affect emergency response times. To reduce LAPD demand during construction, Modified Alternative 2, as with the Original Alternative 2, would implement a number of security measures under Project Design Feature POL-PDF-1 to limit access to construction areas, including private security, construction fencing, and locked entry. Similar to the Original Alternative 2, construction activities under Modified Alternative 2 may involve temporary lane closures to accommodate trucks entering and exiting the Project Site. Under Project Design Feature TRAF-PDF-1, a Construction Traffic Management Plan would ensure that adequate and safe access remains available at the Project Site during construction activities. The Construction Traffic Management Plan would be approved by the LADOT to ensure maintenance of emergency access. Project Design Feature TRAF-PDF-2 would implement a Construction Worker Parking Plan to identify and enforce parking location requirements for construction workers. Furthermore, construction-related traffic generated by Modified Alternative 2, as with the Original Alternative 2, would not significantly affect LAPD response times within the Project vicinity as LAPD vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic during construction. With implementation of the various safety features to reduce the potential for incidents that would require police responses, construction of the Original Alternative 2 or Modified Alternative 2 would not result in substantial adverse physical impacts requiring new or altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives, and impacts would be less than significant. Accordingly, impacts during construction under Modified Alternative 2 would be similar to the Original Alternative 2.

Alternative 2 would result in a population increase of 2,157 new residents who would increase demand for police protection services. As with the Original Alternative 2, Modified Alternative 2 would incorporate Project Design Feature POL-PDF-2 to provide a 24-hour/seven-day security program to ensure the safety of its employees and site visitors. These measures would reduce demand on police services during operation. Similar to the Original Alternative 2, with the implementation of these features, Modified Alternative 2 would not increase police services demand to the extent that the addition of a new police facility, or the expansion, consolidation, or relocation of an existing facility would be required to maintain service. As such, Modified Alternative 2, as with Original Alternative 2, would result in less than significant impacts with respect police protection services. Because Modified Alternative 2 would increase the Project Site's residential population compared to the Original Alternative 2, impacts to police protection services under Modified Alternative 2 would be incrementally greater than the Original Alternative 2, which were found to be greater than the Original Project and the Original Project with the Deck Concept in the Draft EIR. However, neither the Original Alternative 2 or Modified Alternative 2 would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts. As such, impacts in this regard are considered to be similar between the Original Alternative 2 and the Modified Alternative 2 to those analyzed in the Draft EIR.

**Threshold (a.iii).** LAUSD has student generation rates for residential, office, and commercial uses within their 2018 Developer Fee Justification Study. Trip generation rates and total estimated students for Modified Alternative 2 are presented in **Table 4**, *Estimated Number of Students Generated by Modified Alternative 2*.

**TABLE 4**  
**ESTIMATED NUMBER OF STUDENTS GENERATED MODIFIED ALTERNATIVE 2**

Land Use <sup>a,b</sup>	Use	Generation Factors	Elementary School	Middle School	High School	Total <sup>c</sup>
<b>Proposed Uses</b>						
Residential Multi-Family	895 units	Elm: 0.2269/unit MS:0.0611/unit HS: 0.1296/unit	203	55	113	371
Retail	14,345 sf	0.610/1,000 sf	5	1	3	9
Office	676,437 sf	1.077/1,000 sf	394	109	226	729
Restaurant	28,688 sf	0.610/1,000 sf	9	3	5	17
Hotel	200,210 sf	0.96/1,000 sf	104	29	59	192
Studio/Gallery	35,515 sf	0.610/1,000 sf	12	3	7	22
Gym	34,000 sf	0.610/1,000 sf	11	3	7	21
Elementary School	30,000 sf	0.684/1,000 sf	11	3	7	21
<i>Total Students Generated by Proposed Uses</i>			<b>49</b>	<b>206</b>	<b>427</b>	<b>1,382</b>
<b>Existing Uses</b>						
Office	11,157 sf	0.610/1,000 sf	7	2	4	13
Dry Storage	32,382 sf	0.013/1,000 sf	1	1	1	3
Freezer/Cooler	161,854 sf	0.013/1,000 sf	2	1	1	4
<i>Total Students Generated by Existing Uses</i>			<b>10</b>	<b>4</b>	<b>6</b>	<b>20</b>
<b>Net Increase (Proposed-Existing)</b>			<b>739</b>	<b>202</b>	<b>421</b>	<b>1,362</b>

NOTE(S):

- <sup>a</sup> Student generation rates for residential uses are based on Table 3 of the LAUSD 2018 Developer Fee Justification Study: Elementary
- <sup>b</sup> Student generation for the office, hotel, retail, restaurant, studio space, and gym uses is based on the Neighborhood Shopping Center student generation rates as provided in Table 15 of the LAUSD 2018 Developer Fee Justification Study. Student generation for the school use is based on Research and Development (no school uses are listed) in Table 15. Since the Developer Fee Justification Study does not specify grade levels for non-residential land uses, the students generated by the non-residential uses are assumed to be divided among the elementary school, middle school, and high school levels at the same distribution ratio observed for the residential generation factors (i.e., approximately 54 percent elementary school, 15 percent middle school, and 31 percent high school). For the existing dry storage and freezer/cooler uses, the Rental Self Storage factor was used.
- <sup>c</sup> Rounded to the nearest whole number.

SOURCE: ESA, 2024

Based on these rates, Modified Alternative 2 would generate approximately 739 elementary school students, 202 middle school students, and 421 high school students, resulting in a total of 1,362 students. The Original Alternative 2 would generate approximately 764 elementary school students, 211 middle school students, and 440 high school students, resulting in a total of 1,415 students. Similar to the Original Alternative 2, Modified Alternative 2 would incorporate a charter elementary school that would accommodate up to 300 students. In addition, pursuant to Section 65995 of the California Government Code, the Project Applicant would be required to pay fees in

accordance with SB 50. Payment of such fees is intended for the general purpose of addressing the construction of new school facilities, whether schools serving the Project are at capacity or not and, pursuant to Section 65995(h), payment of such fees is deemed to be full mitigation of a project's development impacts. As such, impacts to school facilities and services under Modified Alternative 2 would, as with the Original Alternative 2, would be less than significant. Because Modified Alternative 2 would result in fewer net new students as compared to the Original Alternative 2, due to its reduction in office floor area, impacts to school services under Modified Alternative 2 would be incrementally less than the Original Alternative 2, which were found to be less than the Original Project and the Original Project with the Deck Concept in the Draft EIR. However, neither the Original Alternative 2 or Modified Alternative 2 would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts. As such, impacts in this regard are considered to be similar between the Original Alternative 2 and the Modified Alternative 2 to those analyzed in the Draft EIR.

**Threshold (a.iv), (b), and (c).** Modified Alternative 2 would generate approximately 2,157 new residents who would utilize parks and recreation facilities. In contrast, the Original Alternative 2 would generate approximately 1,013 new residents. Modified Alternative 2 would provide 184,000 square feet of open space with the inclusion of the 72,990 square foot Deck, whereas the Original Alternative 2 would provide 213,139 square feet of open space with the Deck. Modified Alternative 2, as with the Original Alternative 2, would comply with LAMC requirements to pay the \$200 tax per new eligible residential unit. In addition, Modified Alternative 2, as with the Original Alternative 2, would exceed LAMC regulations regarding the provision of useable open space and would comply with LAMC section 17.12 (the City's parkland dedication ordinance) in accordance with the Quimby Act. As with the Original Alternative 2, Modified Alternative 2 would largely offset demand for recreational facilities through provision of on-site recreational and open space facilities in excess of Code requirements for the benefit of on-site residents, employees, and visitors. As such, Modified Alternative 2 would not result in a high use of public parks and recreational facilities that would result in the substantial deterioration of public recreational facilities, and Modified Alternative 2 would also not require the construction of new, or expansion of existing, park facilities, which could have an adverse impact on the environment. Although Modified Alternative 2 would generate more population compared to the Original Alternative 2, Modified Alternative 2 would generate more revenue to create or improve existing parkland space. Nonetheless, because Modified Alternative 2 would increase the Project Site's residential population compared to the Original Alternative 2, impacts to parks and recreation services/facilities under Modified Alternative 2 would be incrementally greater than the Original Alternative 2, which were found to be greater than the Original Project and the Original Project with the Deck Concept in the Draft EIR. However, neither the Original Alternative 2 or Modified Alternative 2 would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts. As such, impacts in this regard are considered to be similar between the Original Alternative 2 and the Modified Alternative 2 to those analyzed in the Draft EIR.

**Threshold (a.v).** The residential population of Modified Alternative 2 would increase demand for library services. Modified Alternative 2 would generate approximately 2,157 new residents compared to the Original Alternative 2 that would generate approximately 1,013 new residents. The LAPL has indicated they have no plans for a new branch library in the Project vicinity.

However, the service population would not reach the recommended level at which the LAPL would consider building a new branch library in the area. Therefore, Modified Alternative 2 would not create the need for new or physically altered library facilities, the construction of which would result in substantial adverse physical environmental impacts, in order to maintain acceptable service ratios or objectives. Therefore, as with the Original Alternative 2, impacts to libraries under Modified Alternative 2 would be less than significant. Nonetheless, because Modified Alternative 2 would increase the Project Site's residential population compared to the Original Alternative 2, impacts to library services/facilities under Modified Alternative 2 would be incrementally greater than the Original Alternative 2, which were found to be greater than the Original Project and the Original Project with the Deck Concept in the Draft EIR. However, neither the Original Alternative 2 or Modified Alternative 2 would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts. As such, impacts in this regard are considered to be similar between the Original Alternative 2 and the Modified Alternative 2 to those analyzed in the Draft EIR.

### **3.11.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?**

No substantial changes have occurred with respect to the circumstances under which the Project would be undertaken. Since the EIR was certified on January 22, 2024, no new major development has occurred around the Project Site. Land use patterns in the vicinity of the Project Site have remained the same and no major changes have occurred that would constitute changed circumstances for undertaking the Modified Alternative 2. Notably, the immediately adjacent uses surrounding the Project Site are the same as when the previous EIR was certified. The current circumstances in the immediate vicinity of the Project Site would not necessitate any changes to the conclusions presented in the Certified EIR.

### **3.11.4 Any New Information Requiring New Analysis or Verification?**

There is no new information such as new cumulative projects, studies, plans, policies or regulations of substantial importance associated with the Modified Alternative 2 relative to public services that would show that: (1) the Modified Alternative 2 would have one or more significant effects not discussed in the Certified EIR; (2) significant effects previously examined will be substantially more severe than shown in the Certified EIR; (3) mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the Project, but the Project proponents declined to adopt the mitigation measure or alternative; or (4) mitigation measures or alternatives which are considerably different from those analyzed in the Certified EIR would substantially reduce one or more significant effects on the environment, but the Project proponents declined to adopt the mitigation measure or alternative.

### **3.11.5 EIR's Mitigation Measures Addressing Impact**

No mitigation measures were required. Refer to Project Design Features TRAF-PDF-1 and TRAF-PDF-2. In addition, the following PDFs set forth in the Certified EIR and the associated MMRP to address police protection impacts would be implemented as part of the Modified Project. No new



mitigation measures are required, as no new significant public services impacts would result from implementation of the Modified Project.

**Project Design Feature POL-PDF-1: Security Features During Construction.** Private security personnel will monitor vehicle and pedestrian access to the construction areas and patrol the Project Site, construction fencing with gated and locked entry will be installed around the perimeter of the construction site, and security lighting will be provided in and around the construction site.

**Project Design Feature POL-PDF-2: Security Features During Operation.** The following security features will be implemented during Project operation:

- Controlled access of the multifamily residential uses, office uses, hotel units, and the residential and hotel common open space areas.
- Access to commercial and restaurant uses and publicly accessible open space areas will be unrestricted during business hours, but public access will be discontinued after businesses have closed.
- Facility operations will include staff training and building access/design to assist in crime prevention efforts and to reduce the demand for police protection services.
- Project Site security will include provision of 24-hour video surveillance and full-time security personnel.
- Duties of the security personnel will include, but would not be limited to, assisting residents and visitors with Project Site access; monitoring entrances and exits of buildings; managing and monitoring fire/life/safety systems; and patrolling the property.
- Project design will include lighting of entryways, publicly accessible areas, and common building and open space residential areas for security purposes.
- Public amenity areas, including the Mesquit Paseo, Elevated Pedestrian Walkway and River Balconies, Entry Plazas, Northern Landscaped Area, and the Deck (under the Project with the Deck Concept) will be generally open to the public from 6 A.M. to 11 P.M., and will otherwise have restricted access through fencing and gates designed in compliance with LAMC and RIO design standards. These areas will be well lit at night and regularly patrolled by security personnel

### **3.11.6 Conclusion**

Based on the Above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

### 3.12 TRANSPORTATION

Thresholds (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
<b>TRANSPORTATION:</b> Would the project:					
(a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	Less than Significant	No	No	No	No
(b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	Significant and Unavoidable	No	No	Yes	Yes
(c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Significant and Unavoidable	No	No	No	Yes
(d) Result in inadequate emergency access?	Less than Significant	No	No	No	No

#### 3.12.1 Impact Determination in the EIR

With regards to thresholds (a) and (d), the EIR concluded that impacts would be less than significant for the Original Project and the Original Alternative 2. With regards to threshold (b), the EIR concluded that VMT impacts would be significant and unavoidable, even with implementation of Mitigation Measure TRAF-MM-1 for the Original Project, and was found to be less than significant under the Original Alternative 2. With regards to threshold (c), the EIR concluded that impacts under both the Original Project and the Original alternative 2 regarding freeway safety due to off-ramp queueing at the intersection of the US-101 Southbound Off-ramp and 7th Street would be significant and unavoidable even with implementation of Mitigation Measure TRAF-MM-2. Mitigation Measure TRAF-MM-2 would signalize the intersection of the US-101 Southbound Off-ramp and 7th Street and sufficiently reduce the off-ramp queue so as to not extend onto the freeway mainline under both the Original Project and the Original alternative 2. However, since the intersection is within the jurisdiction of another public agency (Caltrans), and the improvement would involve a decision by Caltrans, the City cannot guarantee that Caltrans will agree with implementation of this mitigation measure. Therefore, the Draft EIR conservatively concluded that the impacts related to freeway safety would remain significant and unavoidable.

#### 3.12.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

**Threshold (a).** Modified Alternative 2, as with the Original Alternative 2, would not conflict with any programs, plans, ordinances, or policies addressing the circulation system, transit, roadways, bicycle and pedestrian facilities. Modified Alternative 2 would increase population and employment density in close proximity to a major transit stop. and would also provide for road and pedestrian improvements, including multiple pedestrian and vehicle access points throughout the

Project Site, similar to the Original Alternative 2. As such, impacts related to conflicts with programs, plans, ordinances or policies under Modified Alternative 2 would be less than significant and similar to the Original Alternative 2, which were found to be similar to the Original Project and the Original Project with the Deck Concept in the Draft EIR.

**Threshold (b).** Both the Original Alternative 2 and Modified Alternative 2 are estimated to generate fewer daily vehicle trips and fewer daily VMT than then Original Project with the Deck Concept. The Original Alternative 2 is estimated to produce a total of 17,855 daily vehicle trips and a total daily VMT of 129,528. Modified Alternative 2 is estimated to produce a total of 15,336 daily vehicle trips and a total daily VMT of 109,507 (see Attachment A, Modified Alternative 2 Traffic Memorandum). The Original Alternative 2 would have a daily household VMT per capita of 4.4 and a daily work VMT per employee of 6.2, while the Modified Alternative 2 would have a daily household VMT per capita of 4.9 and a daily work VMT per employee of 6.7. While the daily household and work VMT would be increased under the Modified Alternative 2, both would be well below the City's impact thresholds for VMT. Despite this minor increase in daily VMT per capita and employee, the total daily VMT would be reduced under the Modified Alternative 2 and for this reason, VMT impacts under Modified Alternative 2 would be less than the Original Alternative 2, which were found to be less than the Original Project and less than the Original Project with the Deck Concept in the Draft EIR.

**Threshold (c).** As with the Original Alternative 2, Modified Alternative 2's access locations would provide adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls that meet the City's requirements to protect pedestrian safety. Pedestrian entrances separated from vehicular driveways would provide access from the adjacent streets, parking facilities, and transit stops. The provided driveways would be designed to comply with LADOT standards. Therefore, the Original Alternative 2 or Modified Alternative 2 would not substantially increase geometric hazards due to a design feature or incompatible uses, and impacts on local safety would be less than significant.

Regarding freeway safety, Modified Alternative 2 is projected to increase the queue onto the mainline lines by more than two but less than five car lengths compared to the five car lengths under the Original Alternative 2. Similar to the Original Alternative 2, Modified Alternative 2 would be required to implement Mitigation Measure TRAF-MM-2 to signalize the intersection of the US-101 Southbound Off-ramp and 7th Street, which would sufficiently reduce the off-ramp queue and would not extend onto the freeway mainline. However, since the intersection is within the jurisdiction of Caltrans, and the improvement would involve a decision by Caltrans, the City cannot guarantee that Caltrans will agree with implementation of this mitigation measure. Therefore, it is conservatively concluded that the impacts related to freeway safety would remain significant and unavoidable. However, as Modified Alternative 2 would result in fewer car lengths projected onto the mainline lines than the Original Alternative 2, impacts under Modified Alternative 2 would be less than the Original Alternative 2, which were found to be less than the Original Project and less than the Original Project with the Deck Concept in the Draft EIR.

**Threshold (d).** Similar to the Original Alternative 2, Modified Alternative 2 would implement TRAF-PDF-1 to ensure that emergency access and emergency response implementation would be maintained during construction. Further, the site plan would be reviewed prior to issuance of a building permit to ensure that all Los Angeles Fire Department fire safety requirements (including those related to emergency access) are met as part of the City's standard plan check

review process. During operation, under Modified Alternative 2 and the Original Alternative 2, a section of Mesquit Street, a designated Collector Street, would be permanently closed for the development of the Mesquit Paseo between 6th Street and 7th Street. Mesquit Street, which is currently not accessible from 7th Street because of 7th Street's elevated approach to the 7th Street Bridge, consists entirely of the two-block segment between 6th Street and 7th Street. Mesquit Street, thus, does not currently provide through access to surrounding neighborhoods. With development, access to Mesquit Street and the Paseo would continue to be accessible from 6th Street and emergency access would be newly available from 7th Street. With review and approval of Project Site access and circulation plans by the LAFD, Modified Alternative 2, as with the Original Alternative 2, would not impair implementation of or physically interfere with adopted emergency response or emergency evacuation plans. Impacts regarding emergency access under Modified Alternative 2 would be less than significant and similar to the Original Alternative 2, which were found to be similar to the Original Project and the Original Project with the Deck Concept in the Draft EIR.

### **3.12.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?**

**Thresholds (a)-(d).** No substantial changes have occurred with respect to the circumstances under which the Project would be undertaken. Since the EIR was certified on January 22, 2024, no new major development has occurred around the Project Site. Land use patterns in the vicinity of the Project Site have remained the same and no major changes have occurred that would constitute changed circumstances for undertaking the Modified Alternative 2. Notably, the immediately adjacent uses surrounding the Project Site are the same as when the previous EIR was certified. The current circumstances in the immediate vicinity of the Project Site would not necessitate any changes to the conclusions presented in the Certified EIR.

### **3.12.4 Any New Information Requiring New Analysis or Verification?**

There is no new information such as new cumulative projects, studies, plans, policies or regulations of substantial importance associated with the Modified Alternative 2 relative to transportation that would show that: (1) the Modified Alternative 2 would have one or more significant effects not discussed in the Certified EIR; (2) significant effects previously examined will be substantially more severe than shown in the Certified EIR; (3) mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the Project, but the Project proponents declined to adopt the mitigation measure or alternative; or (4) mitigation measures or alternatives which are considerably different from those analyzed in the Certified EIR would substantially reduce one or more significant effects on the environment, but the Project proponents declined to adopt the mitigation measure or alternative.

### **3.12.5 EIR's Mitigation Measures Addressing Impact**

The following PDFs and mitigation measures set forth in the Certified EIR and the associated MMRP to address transportation impacts would be implemented as part of the Modified Project. No additional mitigation measures are required, as no new significant transportation impacts would result from implementation of the Modified Project.

**Project Design Feature TRAF-PDF-1: Construction Traffic Management Plan.** Prior to the issuance of a demolition permit or building permit for the Project, a detailed Construction Management Plan will be prepared and submitted to the City for review and approval. The Construction Management Plan will include, but not be limited to, the following elements as appropriate:

- As traffic lane, parking lane and/or sidewalk closures are anticipated, worksite traffic control plan(s), approved by the City of Los Angeles, will be developed and implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures.
- Ensure that access will be maintained for land uses in proximity to the Project Site during project construction.
- Coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project Site and neighboring businesses and residences.
- Provide off-site truck staging in a legal area furnished by the construction truck contractor.
- Schedule deliveries and pick-ups of construction materials during non-peak travel periods to the extent possible and coordinate to reduce the potential of trucks waiting to load or unload for protracted periods.
- Describe the haul truck routes and avoid haul truck routes that travel past Los Angeles Unified School District facilities.

**Project Design Feature TRAF-PDF-2: Construction Worker Parking Plan.** The Applicant will prepare a Construction Worker Parking Plan prior to commencement of construction to identify and enforce parking location requirements for construction workers. The Construction Worker Parking Plan will include, but not be limited to, the following elements as appropriate:

- During construction activities when construction worker parking cannot be accommodated on the Project Site, the plan will identify alternate parking location(s) for construction workers and the method of transportation to and from the Project Site (if beyond walking distance) for approval by the City 30 days prior to commencement of construction.
- Construction workers will not be permitted to park on street with the exception of Mesquit Street and Jesse Street east of Santa Fe Avenue.
- Provide all construction contractors with written information on where their workers and their subcontractors are permitted to park and provide clear consequences to violators for failure to follow these regulations.

**TRAF-MM-1: Transportation Demand Management (TDM) Program.** The Applicant shall implement a TDM Program aimed at discouraging single-occupancy vehicle trips and encouraging alternative modes of transportation, such as carpooling, taking transit, walking, and biking. The TDM Program shall detail additional program elements beyond the site design features already incorporated into the Project. The TDM Program shall be subject to review and approval by LADOT. The exact measures to be implemented shall be determined when the Program is prepared. A preliminary TDM Program shall be submitted for LADOT review prior to issuance of the first building permit for the Project, with final TDM approval by LADOT required

before issuance of the first certificate of occupancy for the Project. Required strategies in the TDM Program shall include, but are not necessarily limited to:

### Parking

- Parking cost unbundled from leases for office and commercial tenants, coupled with employee parking cash-out and pricing workplace parking.
- Parking costs unbundled from rent for residential tenants.

### Transit

- Tenants in the office and commercial uses and residents shall be provided with the opportunity to obtain subsidized/discounted daily or monthly public transit passes to use locally/regionally. These passes can be partially or wholly subsidized by the employer and residential management company, respectively.
- Public bus stop enhancements/amenities, such as curb cuts and continental crosswalks, at bus stops nearest to Project Site:
  - Decatur Street & 7th Street: Metro Rapid 720
  - Alameda Street & 7th Street: Metro Rapid 760
  - Imperial Street & 7th Street: Metro 18, 60, 62
  - Molino Street & Palmetto Street: LADOT DASH A
- Improved first-mile/last-mile connections to nearby bus stops

### Commute Trip Reductions

- Commute trip reduction program for office and commercial workers and residents including established performance standards, required implementation, monitoring, and reporting.

### Shared Mobility

- A ride-sharing program shall be provided by designating a certain percentage of parking spaces for ride sharing vehicles, designing adequate passenger loading/unloading and waiting areas for ride-sharing vehicles, and providing a website or message board for coordinating rides.

### Education & Encouragement

- TDM marketing and promotion (website and possible mobile app for transportation information specific to the Project).
- Mobility hub (car share, bike share, bike repair facilities, and real-time transit information).

**TRAF-MM-2: US-101 Southbound Off-ramp/7th Street Intersection Signalization.** The Applicant shall work with the City of Los Angeles and Caltrans to signalize the intersection of the US-101 Southbound Off-ramp and 7th Street. This would require complying with the Caltrans project development process as a local agency-sponsored project.

### 3.12.6 Conclusion

Based on the Above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

## 3.13 TRIBAL CULTURAL RESOURCES

Thresholds (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
<b>TRIBAL CULTURAL RESOURCES:</b> Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:					
(i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or)?	Less than Significant with Mitigation	No	No	No	Yes
(ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	Less than Significant with Mitigation	No	No	No	Yes

### 3.13.1 Impact Determination in the EIR

The EIR concluded that impacts to tribal cultural resources would be less than significant with implementation of Mitigation Measures TCR-MM-1 through TCR-MM-3 under the Original Project and the Original Alternative 2.

### **3.13.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?**

**Thresholds (i)-(ii).** Modified Alternative 2 would require the same depth and volume of excavation for the subterranean parking levels as the Original Alternative 2. As with Original Alternative 2, grading and excavation for the Modified Alternative 2, including excavation for subterranean parking may encounter unknown tribal cultural resources. As such, excavation activities have the potential to disturb, damage, or degrade tribal cultural resources that could be encountered during construction and, thus, impact tribal cultural resources. During AB 52 consultation, which occurred during the preparation of the EIR, the Gabrieleño Band of Mission Indians–Kizh Nation indicated that the Project Site is located near former villages and trade routes and as such maintains a high sensitivity for potential to encounter resources of prehistoric and historic origins that may be identified as tribal cultural resources, and mitigation was added as a result of tribal consultation. Similar to the Original Alternative 2, Modified Alternative 2 would be required to implement mitigation measures TCR-MM-1 through TCR-MM-3 to address potential impacts to tribal cultural resources. With mitigation, Modified Alternative 2, as with the Original Alternative 2, would result in less-than-significant impacts to tribal cultural resources.

As such, impacts to tribal cultural resources under Modified Alternative 2 would be similar to the Original Alternative 2, which were found to be greater than the Original Project and less than the Original Project with the Deck Concept in the Draft EIR.

### **3.13.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?**

**Thresholds (i)-(ii).** No substantial changes have occurred with respect to the circumstances under which the Project would be undertaken. Since the EIR was certified on January 22, 2024, no new major development has occurred around the Project Site. Land use patterns in the vicinity of the Project Site have remained the same and no major changes have occurred that would constitute changed circumstances for undertaking the Modified Alternative 2. Notably, the immediately adjacent uses surrounding the Project Site are the same as when the previous EIR was certified. The current circumstances in the immediate vicinity of the Project Site would not necessitate any changes to the conclusions presented in the Certified EIR.

### **3.13.4 Any New Information Requiring New Analysis or Verification?**

There is no new information such as new cumulative projects, studies, plans, policies or regulations of substantial importance associated with the Modified Alternative 2 relative to tribal cultural resources that would show that: (1) the Modified Alternative 2 would have one or more significant effects not discussed in the Certified EIR; (2) significant effects previously examined will be substantially more severe than shown in the Certified EIR; (3) mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the Project, but the Project proponents declined to adopt the mitigation measure or alternative; or (4) mitigation measures or alternatives which are considerably different from those analyzed in the Certified EIR would substantially reduce one or more significant effects on the environment, but the Project proponents declined to adopt the mitigation measure or alternative.



### 3.13.5 EIR's Mitigation Measures Addressing Impact

The following mitigation measures set forth in the Certified EIR and the associated MMRP to address tribal cultural resource impacts would be implemented as part of the Modified Project. No additional mitigation measures are required, as no new significant tribal cultural resources impacts would result from implementation of the Modified Project.

**TCR-MM-1:** Prior to the issuance of a demolition permit, the Applicant shall retain a Native American Monitor from the Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation or Tribe) who shall be present during construction activities deemed by the Native American Monitor to have the potential for encountering tribal cultural resources, such as demolition, pavement removal, clearing/grubbing, drilling/augering, potholing, grading, trenching, excavation, tree removal or other ground disturbing activity associated with the Original Project. The activities to be monitored may also include off-site improvements in the vicinity of the Project Site, such as utilities, sidewalks, or road improvements. A monitoring agreement between the Applicant and Kizh Nation shall be prepared that outlines the roles and responsibilities of the Native American Monitor and shall be submitted to the City prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity. The Native American Monitor shall also provide Sensitivity Training to construction personnel as required by Mitigation Measure CUL-MM-6.

The Native American Monitor, in coordination with the qualified Archaeologist and archaeological monitor as identified in Mitigation Measure CUL-MM-5, shall have the authority to direct the pace of construction equipment activity in areas of higher sensitivity and to temporarily divert, redirect or halt ground disturbance activities to allow identification, evaluation, and potential recovery of tribal cultural resources. Full-time monitoring may be reduced to part-time inspections, or ceased entirely, if determined appropriate by the Native American Monitor in the event there appears to be little to no potential for impacting tribal cultural resources. Native American monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh Nation from a designated point of contact for the Applicant or Lead Agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the Project Site or in connection with the Project are complete; or (2) a determination and written notification by the Kizh Nation to the Project Applicant/Lead Agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact tribal cultural resources.

**TCR-MM-2:** The Native American Monitor shall complete daily monitoring logs that provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs shall identify and describe any discovered tribal cultural resources, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs shall be provided to the Project Applicant/Lead Agency upon written request to the Tribe.

**TCR-MM-3:** In the event that prehistoric/Native American (e.g., hearths, stone tools, shell and faunal bone remains, etc.) archaeological resources are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. An

appropriate buffer area shall be established by the Native American Monitor and archaeological monitor in accordance with industry standards, reasonable assumptions regarding the potential for additional discoveries in the vicinity, and safety considerations for those making and evaluation and potential recovery of the discovery. This buffer area shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. A meeting shall take place between the Applicant, the qualified Archaeologist, the Gabrieleno Tribe, and the City to discuss the significance of the find and whether it qualifies as a tribal cultural resource pursuant to Public Resources Code Section 21074(a). If, as a result of the meeting and after consultation with the Gabrieleno Tribe and the qualified Archaeologist, a decision that the resource is in fact a tribal cultural resource, a treatment plan shall be developed by the Gabrieleno Tribe, with input from the qualified Archaeologist as necessary, and with the concurrence of the City's Planning Director. The treatment measures in the treatment plan shall be implemented prior to construction work continuing in the buffer around of the find. The preferred treatment is avoidance, but if not feasible may include, but would not be limited to, capping in place, excavation and removal of the resource and follow-up laboratory processing and analysis, interpretive displays, sensitive area signage, or other mutually agreed upon measures. The treatment plan shall also include measures regarding the curation of the recovered resources. The recovered prehistoric or Native American resources may be placed in the custody of the Gabrieleno Tribe who may choose to use them for their educational purposes or they may be curated at a public, non-profit institution with a research interest in the materials. If neither the Gabrieleno Tribe or institution accepts the resources, they may be donated to a local school or historical society in the area for educational purposes.

### 3.13.6 Conclusion

Based on the Above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

## 3.14 UTILITIES AND SERVICE SYSTEMS

Thresholds (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
<b>UTILITIES AND SERVICE SYSTEMS:</b> Would the project:					
(a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	Less than Significant	No	No	No	No
(b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	Less than Significant	No	No	Yes	No

Thresholds (and Supporting Information Sources)	Impact Determination in the Certified EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIR's Mitigation Measures Addressing Impacts
(c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	Less than Significant	No	No	Yes	No
(d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	Less than Significant	No	No	Yes	No
(e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	Less than Significant	No	No	No	No

### 3.14.1 Impact Determination in the EIR

With regards to utilities and service systems, the EIR concluded that impacts would be less than significant under the Original Project and the Original Alternative 2.

### 3.14.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

**Threshold (a).** Modified Alternative 2 would consist of the reconfiguration of uses within the Project site, within the same proposed total developed floor area as the Original Alternative 2. Similar to the Original Alternative 2, Modified Alternative 2 would not require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities that could cause significant environmental effects. As such, impacts under Modified Alternative 2 would be similar to the Original Alternative 2, which were found to be similar to the Original Project and the Original Project with the Deck Concept in the Draft EIR.

**Threshold (b).** Similar to the Original Alternative 2, construction and operation of Modified Alternative 2 would increase demand on water supplies and off-site infrastructure. As shown in **Table 5, *Estimated Water Demand for Modified Alternative 2***, Modified Alternative 2 would generate an estimated net water demand of 317,687 gallons per day (gpd) or 356 acre-feet per year (afy). In comparison, the Original Alternative 2 would have a net water demand of 393,560 gpd or 441 afy. Modified Alternative 2's gross water demand of 377,325 gpd or 422 afy would be 75,873 gpd or 85 afy less than the Original Alternative 2's 453,198 gpd or 508 afy.

Similar to the Original Alternative 2, Modified Alternative 2's water demand projections would be within LADWP's 2015 UWMP's projected increases in Citywide water demands, while anticipating multi-dry year water conditions through the planning horizon of 2040.

**TABLE 5  
ESTIMATED WATER DEMAND FOR MODIFIED ALTERNATIVE 2**

Proposed Uses	Quantity	Water Use Factor (gpd/unit) <sup>a</sup>	Base Demand (gpd)	Water Efficiency Requirements Ordinance Savings (gpd) <sup>b,c</sup>	Net Proposed Water Demand	
					(gpd)	(afy)
<b>Residential</b>						
Studio	356 du	75/du	26,700			
1 Bedroom	530 du	110/du	58,300			
3–5 Bedrooms	9 du	190/du	1,710			
Base Demand Adjustment (Residential Units)			12,175			
<i>Residential Units Subtotal</i>	<i>895 du</i>		<i>98,885</i>	<i>33,446</i>	<i>90,429</i>	<i>101</i>
Lobby	8,300 sf	0.05/sf	415			
Pool/Spa	2,000 sf		192			
BBQ area	500 sf	0.13/sf	65			
<i>Residential Amenities Subtotal</i>			<i>672</i>	<i>672</i>	<i>0</i>	<i>0</i>
Hotel Room	271 room	120/room	32,520			
Base Demand Adjustment (Hotel Room)			2,945			
<i>Hotel Room Subtotal</i>			<i>35,465</i>	<i>3,869</i>	<i>31,596</i>	<i>36</i>
Lobby	3,000 sf	0.05/sf	150			
Pool Deck	5,000 sf	0.30/sf	1,500			
Gym	1,700 sf	0.65/sf	1,105			
Bar	2,000 sf	0.72/sf	1,440			
Meeting Room	800 sf	0.35/sf	280			
<i>Hotel Amenities Subtotal</i>			<i>4,475</i>	<i>557</i>	<i>3,918</i>	<i>3.3</i>
Restaurant: Full Service	28,688 sf (1,912 seats)	30/seat	57,360			
General Retail	14,345 sf	0.03/sf	431			
Office	676,437 sf	0.12/sf	81,172			
Office Lobby	11,000 sf	0.05/sf	550			
Water Features	200 sf		19			
Gallery Space	35,515 sf	0.03/sf	1,065			
Gym	34,000 sf	0.65/sf	22,100			
Elementary School	300 students	9/student	2,700			
Base Demand Adjustment (Commercial)			1,221			
<i>Commercial Subtotal</i>			<i>167,811</i>	<i>15,504</i>	<i>152,307</i>	<i>171</i>
Landscaping <sup>c</sup>	54,825 sf		5,121	2,794	2,327	2.6
Covered Parking Structure	854,140 sf	0.02/sf	562	0	562	0.63
Cooling Tower Total	6,000 ton	25.25	151,470	30,294	121,176	136
<b>Proposed Total</b>			<b>464,461</b>	<b>87,136</b>	<b>377,325</b>	<b>422</b>

**TABLE 5  
ESTIMATED WATER DEMAND FOR MODIFIED ALTERNATIVE 2**

Proposed Uses	Quantity	Water Use Factor (gpd/unit) <sup>a</sup>	Base Demand (gpd)	Water Efficiency Requirements Ordinance Savings (gpd) <sup>b,c</sup>	Net Proposed Water Demand	
					(gpd)	(afy)
Less Existing Uses to Be Removed					-58,526	-65.6
Less Additional Conservation					-1,112	-1.3
<b>Net Water Demand</b>					<b>317,687</b>	<b>356</b>
<b>Gross Water Demand Compared to Original Alternative 2</b>					<b>-75,873</b>	<b>-85</b>

NOTE(S):

- <sup>a</sup> Water Use Factor is based on City's Department of Public Works, Bureau of Sanitation, Sewage Generation Factors for Residential and Commercial Categories, dated April 6, 2012.
- <sup>b</sup> The Water Efficiency Requirements Ordinance Savings used for Modified Alternative 2 are based on similar applicable savings (in percentage) provided in the approved WSA for the Original Project.
- <sup>c</sup> Water conservation due to conservation commitments, as detailed in approved WSA for the Project and as WS-PDF-1, is the same as the Original Project as for Alternative 2, as Alternative 2 would apply the same conservation commitments as under the Original Project.

SOURCE: ESA, 2024

Because Modified Alternative 2 would generate less water demand than the Original Alternative 2, impacts under Alternative 2 would be less than the Original Alternative 2, which were found to be less than the Original Project and the Original Project with the Deck Concept in the Draft EIR.

**Threshold (c).** Similar to the Original Alternative 2, Modified Alternative 2 would generate additional wastewater and increase demand on the HWRP and the Hyperion Sanitary Sewer System. **Table 6, Wastewater Generation for Modified Alternative 2,** shows that Modified Alternative 2 would result in an estimated average gross wastewater generation of approximately 454,118 gpd. Modified Alternative 2 would have an estimated net wastewater generation volume of 414,176 gpd or 0.414 mgd. This estimate does not account for reductions in wastewater generation that would result from required compliance with applicable LAMC requirements or water conservation measures, as presented in Project Design Feature WS-PDF-1. Comparatively, the Original Alternative 2 is estimated to increase on-site wastewater generation by a net of 509,871 gpd or 0.509 mgd. Modified Alternative 2's gross wastewater demand of 420,338 gpd would be 61,915 gpd less than the Original Alternative 2's 516,033 gpd.

Similar to the Original Alternative 2, the increase in wastewater generation by Modified Alternative 2 would be within the capacity limits of the conveyance and treatment facilities serving the Project Site as determined in the WWSI for the Original Project. Similar to the Original Alternative 2, impacts on wastewater conveyance and treatment systems under Modified Alternative 2 would be less than significant. However, because Modified Alternative 2 would generate a lower volume of wastewater, impacts under Modified Alternative 2 would be less than the Original Alternative 2, which were found to be less than the Original Project and the Original Project with the Deck Concept in the Draft EIR.

**TABLE 6  
WASTEWATER GENERATION FOR MODIFIED ALTERNATIVE 2**

<b>Land Use</b>	<b>Units</b>	<b>Generation Rate (gpd/unit)</b>	<b>Total Wastewater Generation (gpd)</b>
<b>Existing to Be Removed</b>			
Cold Storage	205,393 sf	30/1,000 sf	6,162
<b>Proposed</b>			
Residential: Apt – Bachelor	356 rooms	75/Room	26,700
Residential: Apt – 1 Bedroom	530 rooms	110/Room	58,300
Residential: Apt – 3–5 Bedrooms	9 rooms	190/Room	1,710
Hotel: Use Guest Rooms Only	271 room	120/room	26,700
Hotel Bar: Cocktail, Fixed Seat <sup>a,b</sup>	2,000 sf (134 seats)	15/seat	2,010
Meeting Room	800 sf	350/1,000 sf	280
Restaurant: full Service Indoor Seat <sup>a</sup>	28,688 sf (1,912 seats)	30/seat	57,360
Retail	14,345 sf	25/1,000 sf	358
Office Building w/Cooling Towers	676,437 sf	170/1,000 sf	114,994
Museum: All Area	35,515 sf	30/1,000 sf	1,066
Health Club/Spa	34,000 sf	650/1,000 sf	22,100
Water Features	1,000 cf		7,480
Reflecting Pools	1,000 cf		7,480
Pools	11,500 cf		86,020
Spas	1,000 cf		7,450
Elementary School <sup>b</sup>	300 students	11/student	3,300
<b>Gross Wastewater Generation</b>			<b>420,338</b>
Less Existing to be Removed			-6,162
<b>Net Wastewater Generation</b>			<b>414,176</b>
<b>Gross Wastewater Generation Compared to Original Alternative 2</b>			<b>-95,695gpd</b>

NOTE(S): sf = square feet; cf = cubic feet; gpd = gallons per day

<sup>a</sup> It is assumed that each seat requires 15 square feet.

<sup>b</sup> Water demand generation factors for the school use are based on LA Sanitation’s Sewage Generation Factors for Residential and Commercial Categories, dated April 6, 2012.

SOURCE: ESA, 2024

**Threshold (d).** Modified Alternative 2 would generate solid waste at the Project Site that would need to be landfilled. As Modified Alternative 2 would demolish the same buildings and hardscape and would construct the same 1,792,103 square feet of buildings as under the Original Alternative 2, construction of Modified Alternative 2 would be the same as under the Original Alternative 2. The C&D waste generated by construction of Modified Alternative 2 would be disposed of at the County’s Azusa Land Reclamation landfill or one of the Inert Debris Engineered Fill Operations located in the County that is permitted to receive C&D waste or exported to an out-of-county

facility currently accepting waste from Los Angeles County, all of which have remaining disposal capacity to receive the C&D waste. Similar to the Original Alternative 2, Modified Alternative 2 construction would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals, and construction impacts on solid waste would be less than significant.

Modified Alternative 2's estimated solid waste output during operation is presented in **Table 7, *Estimated Operational Generation for Modified Alternative 2***. As shown in Table 7, Modified Alternative 2 would generate, post-diversion, 2,375 net tons of solid waste per year and 13,013 pounds of solid waste per day.

The Sunshine Canyon Landfill, the primary recipient of Class III solid waste from the City, has a maximum daily capacity of 12,100 tons per day and a disposal rate of 6,919 tons per day, indicating a residual daily capacity of 5,181 tons per day. Modified Alternative 2's net addition of 7.6 tons per day<sup>4</sup> would represent 0.15 percent of Sunshine Canyon's residual daily capacity, assuming diversion. By comparison, the Original Alternative 2, with diversion, would generate approximately 3,236 net tons per year (10.37 tons per day) of solid waste, representing approximately 0.20 percent of Sunshine Canyon's residual capacity. Modified Alternative 2's gross solid waste generation (post-diversion) of 2,423 tons/year or 13,275 lbs/day would be 861 tons/year or 4,718 lbs/day less than the Original Alternative 2's 3,284 tons/year or 17,993 lbs/day, respectively.

Similar to the Original Alternative 2, Modified Alternative 2's additional solid waste generation would be accommodated by the County's City-certified waste processing facilities. As with the Original Alternative 2, Modified Alternative 2's operation would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Similar to the Original Alternative 2, impacts with respect to solid waste under Modified Alternative 2 would be less than significant. However, because Modified Alternative 2 would generate less solid waste as compared to the Original Alternative 2, impacts under Alternative 2 would be less than the Original Alternative 2, which were found to be less than the Original Project and the Original Project with the Deck Concept in the Draft EIR.

**Threshold (e).** Modified Alternative 2, as with the Original Alternative 2, would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. Therefore, similar to the Original Alternative 2, impacts regarding consistency with solid waste regulations under Modified Alternative 2 would be less than significant. As such, impacts under Modified Alternative 2 would be similar to the Original Alternative 2, which were found to be similar to the Original Project and the Original Project with the Deck Concept in the Draft EIR.

---

<sup>4</sup> Modified Alternative 2's daily disposal in tons assumes that landfills operate six days per week. 52 weeks \* 6 days = 312 days. Therefore, Modified Alternative 2's daily disposal is calculated as 2,375 net tons per year/ 312 days = 7.6 net tons per day.

**TABLE 7**  
**ESTIMATED OPERATIONAL SOLID WASTE GENERATION FOR MODIFIED ALTERNATIVE 2**

Land Use	Quantity <sup>a</sup>	Daily Generation Factor <sup>b</sup>	Solid Waste Generation (tons/year)	Solid Waste Generation (lbs/day)
<b>Proposed New Uses</b>				
Residential	895 units	0.87 tons/unit/year	779	4,268
Office	676,437 sf (2,706 emp)	2.02 tons/emp/year	5,466	29,951
Restaurant/Retail/Other Commercial <sup>c</sup>	112,548 sf (214 emp)	1.96 tons/emp/year	419	2,296
Hotel	271 rooms (136 emp)	1.76 tons/emp/year	239	1,310
Elementary School	30,000 sf (300 students: 30 emp)	0.63 tons/emp/year	19	104
<i>Proposed Subtotal<sup>d</sup></i>	<i>(3,981 emp)</i>	—	6,922	37,929
Existing Uses <sup>e</sup>	205,393 sf (218 emp)		(137)	(748)
<b>Net Increase (pre-diversion)</b>	—	—	<b>6,785</b>	<b>37,181</b>
<b>Net Increase (post-diversion)<sup>f</sup></b>	—	—	<b>2,375</b>	<b>13,013</b>
<b>Gross Solid Waste Generation Compared to Original Alternative 2 (Post-Diversion)</b>			<b>-861</b>	<b>-4,718</b>

NOTE(S): lb = pounds; sf = square feet; emp = employees

<sup>a</sup> Number of employees per use are detailed in Table 3, *Estimate of Modified Alternative 2's Employment*.

<sup>b</sup> Generation factors are provided by CalRecycle's Disposal and Diversion Rates for Business Groups, <https://www2.calrecycle.ca.gov/wastecharacterization/businessgroup rates>. Accessed November 1, 2021.

<sup>c</sup> Commercial uses include the gym, restaurants, retail, and studio/event/gallery/museum uses.

<sup>d</sup> Totals may not add up due to rounding.

<sup>e</sup> Existing subtotal is taken from Table IV.N.3-1, in Section IV. N.3. In Chapter IV of the Draft EIR. The amount here is based on the post-diversion existing operational generation as using a lower number for the existing uses would result in a higher net increase for the Original Project.

<sup>f</sup> Based on an anticipated diversion rate of 65 percent for operations, which was assumed in the CoIWMP 2019 Annual Report. This is conservative as the actual diversion is likely to be higher with increasing compliance with the state's recycling goal of 75 percent.

SOURCE: ESA, 2024

### 3.14.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

**Thresholds (a)-(e).** No substantial changes have occurred with respect to the circumstances under which the Project would be undertaken. Since the EIR was certified on January 22, 2024, no new major development has occurred around the Project Site. Land use patterns in the vicinity of the Project Site have remained the same and no major changes have occurred that would



constitute changed circumstances for undertaking the Modified Alternative 2. Notably, the immediately adjacent uses surrounding the Project Site are the same as when the previous EIR was certified. The current circumstances in the immediate vicinity of the Project Site would not necessitate any changes to the conclusions presented in the Certified EIR.

#### **3.14.4 Any New Information Requiring New Analysis or Verification?**

There is no new information such as new cumulative projects, studies, plans, policies or regulations of substantial importance associated with the Modified Alternative 2 relative to utility and service systems that would show that: (1) the Modified Alternative 2 would have one or more significant effects not discussed in the Certified EIR; (2) significant effects previously examined will be substantially more severe than shown in the Certified EIR; (3) mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the Project, but the Project proponents declined to adopt the mitigation measure or alternative; or (4) mitigation measures or alternatives which are considerably different from those analyzed in the Certified EIR would substantially reduce one or more significant effects on the environment, but the Project proponents declined to adopt the mitigation measure or alternative.

#### **3.14.5 EIR's Mitigation Measures Addressing Impact**

No mitigation measures were required. Refer to Project Design Features TRAF-PDF-1. In addition, the following PDF set forth in the Certified EIR and the associated MMRP to address water supply impacts would be implemented as part of the Modified Project. No new mitigation measures are required, as no new significant water supply impacts would result from implementation of the Modified Project.

**Project Design Feature WS-PDF-1: Water Conservation Features.** The Project will provide the following specific water efficiency features:

- High Efficiency Toilets with a flush volume of 1.06 gallons of water per flush, or less;
- Domestic water heating system located in close proximity to point(s) of use, where feasible;
- Leak detection system for swimming pools and Jacuzzis;
- Drip/subsurface irrigation (Micro-Irrigation);
- Proper hydro-zoning/zoned irrigation (group plants with similar water requirements together);
- Drought-tolerant plants – 62 percent of total landscaping
- Water conserving turf – 3 percent of total landscaping with a 0.6 Plant Factor being committed;
- Automated pool chemical delivery system; and
- Installation of thermal pool covers on all outdoor pools/spas.

### **3.14.6 Conclusion**

Based on the Above, the Modified Project would not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

### **3.15 ADDENDUM CONCLUSION**

As demonstrated by the discussion above, impacts associated with the Modified Project would be similar to or less than the impacts addressed in the Certified EIR. No substantial changes would occur with respect to the circumstances under which the Modified Project is undertaken that will require major revisions of the Certified EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects. In addition, no new information of substantial importance has become available relative to any of the environmental topic categories that would result in new or more severe significant environmental impacts. In addition, the applicable mitigation measures included as part of the Certified EIR would continue to be implemented under the Modified Project. As all of the impacts of the Modified Project would be within the envelope of impacts analyzed in the Certified EIR, none of the conditions described in PRC Section 21166 and CEQA Guidelines Sections 15162 and 15163 requiring a Supplemental or Subsequent EIR would occur. Additionally, there are no known mitigation measures or Project alternatives that were previously considered infeasible but are now considered feasible that would substantially reduce one or more significant effects on the environment identified in the Certified EIR. Therefore, the Modified Project would not create any potential adverse impacts beyond those evaluated in the Certified EIR. As such, the preparation of an addendum that amends the description of Alternative 2 in the Certified EIR to include a Modified Alternative 2 is appropriate and fully complies with the requirements of PRC Section 21166 and CEQA Guidelines Sections 15162, 15163, and 15164.

Attachment A  
**Modified Alternative 2  
Traffic Memorandum**

# Technical Memorandum

Date: June 10, 2024  
To: Mike Harden, ESA  
From: Spencer Reed and Tom Gaul  
Subject: **Analysis of 670 Mesquit Modified Design Alternative 2**

LA16-2847

---

## 1. Introduction

Fehr & Peers conducted a study to evaluate the potential transportation impacts of the proposed project located at 670 Mesquit Street (Project/Project Site), situated east and west of Mesquit Street, south of the Sixth Street Viaduct, north of the 7th Street Bridge, and west of the Los Angeles River in the City of Los Angeles. The study included an evaluation of the Project and the Project with the Deck Concept. The findings are documented in a Draft Transportation Assessment dated April 2021<sup>1</sup> which is included as Appendix M in the Draft Project Draft Environmental Impact Report<sup>2</sup> (Draft EIR) dated December 2021. The Final EIR for the Project was released in November 2022.

This technical memorandum documents the assumptions, methodologies, and findings of a vehicle miles traveled (VMT) analysis and freeway safety impact analysis for a revision to the proposed Project Alternative 2 project description (Modified Design Alternative 2) originally included in the 670 Mesquit Project Draft EIR. Modified Design Alternative 2 was analyzed using the same methodologies used to analyze the Project and Original Project Alternative 2, which are in accordance with the City's CEQA transportation thresholds of significance, LADOT's *Transportation Assessment Guidelines* (TAG)<sup>3</sup>, and LADOT's Interim Guidance on Freeway Safety Analysis<sup>4,5</sup>. This memorandum provides a description of the Modified Design Alternative 2, the trip generation

---

<sup>1</sup> Fehr & Peers, *670 Mesquit Draft Transportation Assessment* (April 2021).

<sup>2</sup> Los Angeles Department of City Planning, *Draft Environmental Impact Report, 670 Mesquit Project* (December 2021).

<sup>3</sup> Los Angeles Department of Transportation, *Transportation Assessment Guidelines* (July 2020).

<sup>4</sup> Los Angeles Department of Transportation, *LADOT Transportation Assessments – Interim Guidance for Freeway Safety Analysis* (May 2020).

<sup>5</sup> LADOT's *Transportation Assessment Guidelines* were updated in August 2022, subsequent to the release of the Transportation Assessment and the Draft EIR for the 670 Mesquit project. The August 2022 update folded the methodology described in the prior Interim Guidance document into the body of the TAG itself.

estimates used for a comparison to the completed freeway safety analysis and VMT analysis, and the findings of the freeway safety analysis and VMT analysis. References to Appendix P of the 670 Mesquit Project DEIR are made throughout the memorandum to draw comparisons between the Project, Project 2 Alternative, and Modified Design Alternative 2.

## 2. Description of Modified Design Alternative 2

The Modified Design Alternative 2 project description was evaluated to determine its potential impacts on the surrounding transportation system as compared to the Project and Original Project Alternative 2. Modified Design Alternative 2 is described below and compared to the Project and Original Project Alternative 2 in **Table 1**.

Modified Design Alternative 2 would relocate the hotel use from Building 1, where it would be co-located with residential uses under the Project, to Building 3 as a standalone hotel building. Building 1 would then be comprised of residential and retail uses. Building 2 would have an increased footprint with more office floor area, less retail space, and a smaller gym. Building 4 would consist of office use, studio/event/gallery and potential museum uses. Building 5 would consist of office space and a neighborhood-serving charter elementary school.

Modified Design Alternative 2 would increase the number of residential units by 475 units from 420 units, under Original Project Alternative 2, to 895 units, 144 of which would be affordable. Modified Design Alternative 2 would decrease office floor area by 324,229 square feet from 1,000,666 square feet under Original Project Alternative 2 to 676,437 square feet. Modified Design Alternative 2 would maintain the 30,000 square feet of a neighborhood-serving charter school, which would accommodate up to 300 K-5 students. Modified Design Alternative 2 would increase the retail floor area by 2,681 square feet from 11,664 square feet under Original Project Alternative 2, which includes general retail, grocery, and food hall, to 14,345 square feet of general retail. Modified Design Alternative 2 would reduce the restaurant floor area by 31,012 square feet from 59,700 square feet under Alternative 2 to 28,688 square feet. The hotel would increase the number of rooms by 35 rooms from 236 rooms under Original Project Alternative 2 to 271 rooms, and decrease in size by 9,350 square feet of floor area from 209,560 square feet of floor area under Alternative 2 to 200,210 square feet of floor area. The space available for the studio/event/gallery/potential museum would be reduced by 8,554 square feet of floor area from 44,069 square feet of floor area under the Original Project Alternative 2 to 35,515 square feet of floor area. The gym would be reduced by 18,424 square feet of floor area from 52,424 square feet of floor area under Alternative 2 to 34,000 square feet of floor area.

Similar to Original Project Alternative 2, Modified Design Alternative 2 will include a Deck Concept however the size will be reduced by 2,010 square feet from 75,000 square feet to 72,990 square feet. The outdoor programming would remain the same under Modified Design Alternative 2 as Original Project Alternative 2 and would include the weekly farmers' market, group exercise classes,

and busking. This programming would draw people from the Project Site and adjacent neighborhood.

### 3. Peak Hour Trip Generation Estimates for Project Alternatives

The AM and PM peak hour trip generation for Modified Design Alternative 2 was estimated using the same methodology that was used for the Project and Original Project Alternative 2, described in Chapter 4.2 of the Transportation Assessment. The resulting trip generation estimates for Modified Design Alternative 2 are detailed in **Table 2**. As shown in **Table 2**, Modified Design Alternative 2 is expected to generate a net increase of 1,235 trips in the AM peak hour and 1,186 trips in the PM peak hour. **Table 3** compares estimated peak hour trip generation for the different Alternative 2 options with the estimated peak hour trip generation for the Project and the Project with the Deck Concept. As shown in **Table 3**, the estimated peak hour trip generation for this Alternative would be 8% to 30% lower than that of the Project, 16% to 34% lower than that of the Project with the Deck Concept, and 8% to 34% lower than that of Original Project Alternative 2.

### 4. Freeway Safety Analysis of Project Alternatives

Freeway off-ramp queuing was reviewed for Modified Design Alternative 2 using the same methodology outlined in Chapter 3.4 of the Transportation Assessment for the Original Project Alternative 2 and the proposed Project. This methodology followed LADOT's Interim Guidance on Freeway Safety Analysis.<sup>6</sup> This analysis utilized an impact threshold of a project's traffic adding more than two car lengths (50 feet) to an off-ramp queue that is projected to extend past the ramp storage capacity with a speed differential greater than 30 mph from the mainline freeway.

#### Freeway Safety Impact Analysis

As described in Chapter 3.4 of the Transportation Assessment and in Section IV.L of the Draft EIR, the Project with the Deck Concept is projected to have a significant safety impact on Intersection H, the US-101 Southbound Off-ramp to 7<sup>th</sup> Street, in Future Year 2026 and Future Year 2040. It is projected to increase the southbound queue at this off-ramp onto the mainline lanes by six car lengths. As presented in Appendix P of the 670 Mesquit Project Draft EIR, Original Project Alternative 2 is projected to increase the southbound queue at this off-ramp onto the mainline lanes by five car lengths.

Using the same methodology as the Project, Caltrans Performance Measurement System (PeMS) data were used to identify freeway operating speed(s) during the peak hour being analyzed. The PeMS data showed that the average mainline speed on US-101 Southbound freeway near the 7th Street Off-ramp is 57 miles per hour. Assuming that the traffic queued on the ramp is traveling at

---

<sup>6</sup> See footnote 5.

zero miles per hour since the vehicles extend past the ramp length, this constitutes a potential safety issue at the US-101 Southbound Off-ramp to 7th Street for each Project Alternative.

Although Modified Design Alternative 2 is estimated to generate less traffic than both the Project and Original Project Alternative 2, the reduction in the traffic assumed at the US-101 Southbound Off-ramp to 7th Street (Study Intersection H) will not be sufficient to reduce the queue lengths (six vehicles for the Project and five vehicles for Alternative 2) to below the impact threshold of two vehicles. Therefore, it is determined that the US-101 Southbound Off-ramp to 7th Street will be impacted under Modified Design Alternative 2.

### **Freeway Safety Mitigation**

To offset the potential safety issue, the following mitigation measure, which is the same mitigation measure presented for the Project and for Original Project Alternative 2, was identified:

- The Project applicant shall work with the City of Los Angeles and Caltrans to signalize the intersection of the US-101 Southbound Off-ramp & 7<sup>th</sup> Street. This would require complying with the Caltrans project development process as a local agency-sponsored project.

As described in Chapter 3.4 and 4.2 of the Transportation Assessment, the peak hour signal warrant would be met in the AM and PM peak hours. As presented in Appendix P of the 670 Mesquit Project DEIR, signalization is estimated to reduce the off-ramp queue such that it would no longer extend onto the freeway mainline and would mitigate the impact of the Project or Original Project Alternative 2 in both Future Base (2026 and 2040) plus Project scenarios. Therefore, it can be presumed that the signalization mitigation would also mitigate the impact of Modified Design Alternative 2 as less traffic is generated in this alternative.

However, since the improvement involves another jurisdiction (Caltrans) beyond the City of Los Angeles, its implementation cannot be guaranteed, and the impact is therefore considered to be significant and unavoidable.

## **5. Vehicle Miles Traveled Analysis of Project Alternatives**

### **VMT Impact Criteria**

As described in Chapter 3.2 of the Transportation Assessment and in Section IV.L and Appendix P of the 670 Mesquit Project Draft EIR, the Project and Original Project Alternative 2 were analyzed using the City's analysis procedures and Version 1.4 of the VMT Calculator. Modified Design Alternative 2 was analyzed for potential significant impacts using the same methodology and criteria, as follows:

- For residential projects, a development project may have a potential significant impact if it generates daily household VMT per capita exceeding 15% below the existing average daily

household VMT per capita for the Area Planning Commission (APC) area in which the project is located (see table below). This criterion was used for the multifamily residential component of Modified Design Alternative 2.

- For office projects, a development project may have a potential significant impact if it generates daily work VMT per employee exceeding 15% below the existing average daily work VMT per employee for the APC in which the project is located (see the table below). This criterion was used for the office component of Modified Design Alternative 2.
- Local-serving retail development tends to shorten trips and reduce VMT whereas regional-serving retail development can lead to substitution of longer trips for shorter ones and could increase VMT. In the latter case, any net increase in VMT is considered to be significant. Local-serving is defined as retail uses less than 50,000 square feet. Schools that are intended to primarily serve the immediate community, such as the charter elementary school in Modified Design Alternative 2, may also be screened out from further VMT analysis. However, the charter school was included in the full mixed-use analysis of Modified Design Alternative 2. The proposed retail components of Modified Design Alternative 2 total more than 50,000 square feet and are therefore considered regional-serving. Per the City’s procedures, the City of Los Angeles’ citywide travel demand forecasting model was run to evaluate the potential for the proposed retail uses to result in a net increase in VMT. The methodology and results for the regional-serving retail uses is further detailed in the next section.
- For mixed-use projects, reductions in daily trips and VMT due to internal capture between the project’s land uses should be considered, after which the impact criteria above are applied to each individual land use.

**VMT Impact Criteria (15% Below APC Average)**

<b>Area Planning Commission</b>	<b>Daily Household VMT per Capita</b>	<b>Daily Work VMT per Employee</b>
<b>Central</b>	6.0	7.6
<b>East LA</b>	7.2	12.7
<b>Harbor</b>	9.2	12.3
<b>North Valley</b>	9.2	15.0
<b>South LA</b>	6.0	11.6



**VMT Impact Criteria (15% Below APC Average)**

<b>Area Planning Commission</b>	<b>Daily Household VMT per Capita</b>	<b>Daily Work VMT per Employee</b>
<b>South Valley</b>	9.4	11.6
<b>West LA</b>	7.4	11.1

The Project is located in the Central APC.

Per the TAG, a project could have a significant cumulative impact on VMT if the project has both a significant project-level impact, as determined above, and is not consistent with the Southern California Association of Governments' Regional Transportation Plan/Sustainable Communities Strategy (SCAG RTP/SCS) in terms of development location, density, and intensity.

**VMT Impact Analysis**

Per the City's procedures, daily household VMT per capita and daily work VMT per employee were estimated using the City's VMT Calculator tool for Modified Design Alternative 2. As described in Chapter 3.2 of the Transportation Assessment, the VMT Calculator allows for the selection of a wide variety of potential land uses including the multi-family housing, hotel, office, retail and restaurant uses (which was analyzed as half quality restaurant and half high-turnover restaurant) proposed as part of the Project, Original Project Alternative 2, and Modified Design Alternative 2. However, certain components of the Project and Alternative land uses are not explicitly included in the VMT Calculator. For the purposes of the VMT analysis, the farmer's market was analyzed as grocery, the food hall was included with the quality restaurant, the charter elementary school was analyzed as elementary school, and the studio/event/gallery, group exercise classes and busking were included with the gym.

In addition to the VMT Calculator, the City of Los Angeles' citywide travel demand forecasting model was run with and without the retail components to evaluate the potential for the proposed retail uses in Alternatives 2, 3, and 4 to result in a net increase in VMT. Per the City's procedures, retail VMT was estimated through the following steps:

1. The model traffic analysis zone (TAZ) in which the Project is located was determined.
2. The Project land uses were converted into the appropriate socioeconomic categories utilized in the model. The socioeconomic parameters in the TAZ were adjusted appropriately to reflect removal of the existing land uses and addition of the Project land uses.

3. The model process was run for the model existing base year for the four time periods in the model (AM peak period, midday period, PM peak period, nighttime period) for the following scenarios:
  - a. Base ("without project") scenario
  - b. "Project without retail" scenario, consisting of all of the Project's proposed land uses except the retail uses
  - c. "Project with retail" scenario including all Project land uses
4. The total VMT on the model network within a 12-mile radius of the Project TAZ was calculated for each time period and summed to determine the estimated daily citywide VMT for each scenario. The daily VMT for the "Project without retail" scenario was subtracted from the daily VMT for the "Project with retail" scenario to determine the net change in daily VMT caused by the Project retail uses.

#### *Total VMT*

**Figure 1** presents the City's VMT Calculator dashboard as analyzed for Modified Design Alternative 2. **Table 4** compares the residential and work VMT results for the Project and Project with the Deck Concept with Original Project Alternative 2 and Modified Design Alternative 2. The Project is estimated to produce a total of 27,040 daily vehicle trips and a total daily VMT of 195,304. The Project with the Deck Concept is estimated to produce a total of 27,493 daily vehicle trips and a total daily VMT of 198,540. Both Original Project Alternative 2 and Modified Design Alternative 2 are estimated to generate less daily vehicle trips and less daily VMT than the Project with the Deck Concept. Original Project Alternative 2 is estimated by the Calculator to produce a total of 17,855 daily vehicle trips and a total daily VMT of 129,528. Modified Design Alternative 2 is estimated by the Calculator to produce a total of 15,336 daily vehicle trips and a total daily VMT of 109,507. This is substantially lower than the Project, Project with Deck Concept, and Original Project Alternative 2.

#### *Residential VMT*

As indicated in **Figure 1**, the daily residential VMT per capita is estimated at 4.9 for Modified Design Alternative 2, below the threshold of 6.0 for the Central APC. Thus, neither the Project nor Original Project Alternative 2 or Modified Design Alternative 2 would have a significant impact on residential VMT per capita as estimated by the VMT Calculator. Additional details regarding the VMT analysis are available in **Attachment A**.

#### *Work VMT*

The daily work VMT per employee was estimated at 6.7 for Modified Design Alternative 2. Similar to the Project, this is below the threshold of significance for the Central APC of 7.6 work VMT per employee. Thus, neither the Project nor Original Project Alternative 2 or Modified Design Alternative 2 would have a significant impact on work VMT per employee as estimated by the VMT Calculator. Additional details regarding the analysis are available in **Attachment A**.

### *Regional Serving Retail VMT*

For the purposes of this analysis, consistent with the TAG, the retail components of the Project Alternatives include the restaurant uses (quality restaurant and high-turnover restaurant), the studio/event/gallery, the gym, general retail, farmers' market, group exercise classes, and busking. Since the retail components of Modified Design Alternative 2 are greater than 50,000 square feet, they were evaluated using the City's travel demand forecasting model.

**Table 5** compares the retail VMT results for the Project with the Deck Concept with Original Project Alternative 2 and Modified Design Alternative 2. The Project with the Deck Concept is estimated to have a significant retail impact with an estimated increase of 32,000 miles when the retail components are added to the Project. Original Project Alternative 2 was determined to not be a significant impact as there was found to be an estimated decrease of 6,000 miles when the retail component was added. Project

Original Project Alternative 2 utilized the City's model to estimate a total daily VMT of 92,760,000 miles within a 12-mile radius from the Project TAZ when run without the retail components of Modified Design Alternative 2. With all the Modified Design Alternative 2 retail uses included, the model estimated a total daily VMT of 92,760,000 miles within a 12-mile radius from the Project TAZ. This indicates no change in daily miles on the network before or after the retail was added. This no change in VMT is not considered to be a significant impact since an impact is considered to be significant when any increase in VMT due to retail occurs.

## **6. Summary and Conclusions**

This study was undertaken to analyze the potential VMT and freeway safety impacts of Modified Design Alternative 2 to the proposed Project at 670 Mesquit Street.

- Modified Design Alternative 2 involves the construction of 676,437 square feet of creative office, 30,000 square feet of neighborhood-serving charter school, 14,344 square feet of quality restaurant, 14,344 square feet of high-turnover restaurant, 271 hotel rooms, 751 residential dwelling units, 144 affordable housing dwelling units, 35,515 square feet of studio/event/gallery, 34,000 square feet of gym, 14,345 square feet of general retail, and a deck that is approximately 1.7 acres and includes programmatic features.
- During each of the analyzed peak hours, Modified Design Alternative 2 is projected to generate 8% to 30% fewer trips than the Project, 16% to 34% fewer trips than the Project with the Deck Concept, and 8% to 34% fewer trips than Original Project Alternative 2.
- A freeway safety analysis was conducted for Study Intersection H, US-101 Southbound Off-ramp to 7<sup>th</sup> Street. In the AM peak hour, the Project with the Deck Concept is projected to increase the queue onto the mainline lanes by six car lengths and Original Project Alternative 2 is projected to increase the queue onto the mainline lanes by five car lengths. Modified Design Alternative 2 is projected to increase the queue onto the mainline by more

than two car lengths but less than five car lengths based on its trip generation estimates. Therefore, similar to the Project with the Deck Concept, Original Project Alternative 2, and Modified Design Alternative 2 are projected to have a significant safety impact on the US-101 Southbound Off-ramp to 7<sup>th</sup> Street as, in the AM peak hour, they are each projected to add more than two car lengths (50 feet) to a queue that is extending past the ramp capacity with speed differential greater than 30 mph from the mainline freeway. Signalization of the intersection would mitigate the identified safety issue by reducing the off-ramp queues onto the freeway. However, since the improvement involves another jurisdiction (Caltrans) beyond the City of Los Angeles, its implementation cannot be guaranteed, and the impact is therefore considered to be significant and unavoidable.

- Based on the Project Alternatives' mix of land uses, location, and other characteristics, and like the Project, Original Project Alternative 2 and Modified Design Alternative 2 are projected to have less than significant VMT impacts for the residential, office, and retail land uses. The basic TDM requirements per the Los Angeles Municipal Code would be applicable to each project alternative.

**TABLE 1**  
**670 MESQUIT PROJECT**  
**PROJECT AND PROJECT ALTERNATIVE 2 COMPARISON - SUMMARY OF PROPOSED LAND USES**

<b>Land Use</b>	<b>Units</b>	<b>Project</b>	<b>Original Alternative 2 - Reduced Retail</b>	<b>Alternative 2 Revised</b>
Residential	dwelling units	258	353	751
Affordable Housing	dwelling units	50	67	144
Office	ksf	944.055	1000.666	676.437
General Retail	ksf	79.24	11.664	14.345
Quality Restaurant	ksf	44.788	29.85	14.344
High-Turnover Restaurant	ksf	44.788	29.85	14.344
Hotel	rooms (ksf)	236 (158.647)	236 (209.560)	271 (200.210)
Studio/Event/Gallery	ksf	93.617	44.069	35.515
Gym	ksf	62.148	52.424	34
Grocery	ksf	28.054	0	0
Food Hall	ksf	28.858	0	0
Charter Elementary School	students	0	300	300
Farmers' Market	persons	500	500	500
<b>Deck Size and Programming</b>	<b>Units</b>	<b>Project with the Deck Concept</b>	<b>Original Alternative 2</b>	<b>Alternative 2 Revised</b>
Deck	acres	3.03	1.7	1.7
Group Exercise Classes	persons	280	280	280
Busking	persons	20	20	20

**TABLE 2  
PROPOSED PROJECT ALTERNATIVE 2 REVISED TRIP GENERATION  
670 MESQUIT PROJECT**

Land Use	ITE Land Use Code	Size	Trip Generation Rates [a]						Estimated Trip Generation									
			AM Peak Hour			PM Peak Hour			AM Peak Hour Trips			PM Peak Hour Trips						
			Rate	In%	Out%	Rate	In%	Out%	In	Out	Total	In	Out	Total				
<b>PROPOSED PROJECT</b>																		
<u>Creative Office</u>	710	676.437 ksf	[b]	86%	14%	[b]	17%	83%	438	71	509	97	472	569				
<i>Internal Capture [c]</i>				15%	71%		13%	7%	(67)	(50)	(117)	(13)	(31)	(44)				
<i>Transit, Bike, Ped Adjustment [d]</i>																		
Net External Office (before TNC adjustment)									371	21	392	84	441	525				
Added TNC - from transit			2.5%			2.5%			10	10	20	13	13	26				
Added TNC - from vehicles			2.5%			2.5%			1	9	10	11	2	13				
TNCs already in vehicle trip generation									9	1	10	2	11	13				
Total TNC									20	20	40	26	26	52				
Non-TNC									362	20	382	82	430	512				
Total Vehicle									382	40	422	108	456	564				
<u>Quality Restaurant</u>	931	14.344 ksf	0.73	50%	50%	7.8	67%	33%	5	5	10	75	37	112				
<i>Internal Capture [c]</i>				61%	51%		38%	70%	(3)	(3)	(6)	(28)	(26)	(54)				
<i>Transit, Bike, Ped Adjustment [d]</i>			25%			25%			(1)	(1)	(2)	(12)	(3)	(15)				
Net Driveway Trips (before TNC adjustment)									1	1	2	35	8	43				
Added TNC - from transit			2.5%			2.5%			0	0	0	1	1	2				
Added TNC - from vehicles			2.5%			2.5%			0	0	0	0	1	1				
TNCs already in vehicle trip generation									0	0	0	1	0	1				
Total TNC									0	0	0	2	2	4				
Non-TNC (before pass-by adjustment)									1	1	2	34	8	42				
Total Vehicle									1	1	2	36	10	46				
<i>Pass-by adjustment [e]</i>			10%			10%			0	0	0	(3)	0	(3)				
Non-TNC									1	1	2	31	8	39				
<u>High-Turnover Restaurant</u>	932	14.344 ksf	9.94	55%	45%	9.77	62%	38%	79	64	143	87	53	140				
<i>Internal Capture [c]</i>				61%	51%		38%	70%	(48)	(33)	(81)	(33)	(37)	(70)				
<i>Transit, Bike, Ped Adjustment [d]</i>			25%			25%			(8)	(8)	(16)	(14)	(4)	(18)				
Net Driveway Trips (before TNC adjustment)									23	23	46	40	12	52				
Added TNC - from transit			2.5%			2.5%			1	1	2	1	1	2				
Added TNC - from vehicles			2.5%			2.5%			1	1	2	0	1	1				
TNCs already in vehicle trip generation									1	1	2	1	0	1				
Total TNC									3	3	6	2	2	4				
Non-TNC (before pass-by adjustment)									22	22	44	39	12	51				
Total Vehicle									25	25	50	41	14	55				
<i>Pass-by adjustment [e]</i>			20%			20%			(4)	(4)	(8)	(7)	(2)	(9)				
Non-TNC									18	18	36	32	10	42				
<u>Hotel</u>	310	271 rooms	0.47	59%	41%	0.6	51%	49%	75	52	127	83	80	163				
<i>Internal Capture [c]</i>				3%	36%		20%	15%	(3)	(19)	(22)	(16)	(12)	(28)				
<i>Transit, Bike, Ped Adjustment [d]</i>			25%			25%			(18)	(8)	(26)	(17)	(17)	(34)				
Net External Hotel (before TNC adjustment)									54	25	79	50	51	101				
Added TNC - from transit			2.5%			2.5%			2	2	4	3	3	6				
Added TNC - from vehicles			2.5%			2.5%			1	1	2	1	1	2				
TNCs already in vehicle trip generation									1	1	2	1	1	2				
Total TNC									4	4	8	5	5	10				
Non-TNC									53	24	77	49	50	99				
Total Vehicle									57	28	85	54	55	109				
<u>Residential*</u>	222	751 DU	0.23	12%	88%	0.30	70%	30%	21	152	173	158	67	225				
<i>Internal Capture [c]</i>				7%	14%		35%	45%	(2)	(21)	(23)	(55)	(30)	(85)				
<i>Transit, Bike, Ped Adjustment [d]</i>																		
Net External Residential (before TNC adjustment)									19	131	150	103	37	140				
Added TNC - from transit			2.5%			2.5%			4	4	8	4	4	8				
Added TNC - from vehicles			2.5%			2.5%			3	0	3	1	3	4				
TNCs already in vehicle trip generation									0	3	3	3	1	4				
Total TNC									7	7	14	8	8	16				
Non-TNC									19	128	147	100	36	136				
Total Vehicle									26	135	161	108	44	152				
<u>Affordable Housing</u>	[f]	144 DU	0.5	40%	60%	0.34	55%	45%	29	43	72	27	22	49				
<i>Internal Capture [c]</i>				7%	14%		35%	45%	(2)	(6)	(8)	(9)	(10)	(19)				
<i>Transit, Bike, Ped Adjustment [d]</i>																		
Net External Affordable Housing									27	37	64	18	12	30				
Added TNC - from transit			2.5%			2.5%			2	2	4	1	1	2				
Added TNC - from vehicles			2.5%			2.5%			1	1	2	0	0	0				
TNCs already in vehicle trip generation									1	1	2	0	0	0				
Total TNC									4	4	8	1	1	2				
Non-TNC									26	36	62	18	12	30				
Total Vehicle									30	40	70	19	13	32				
<u>Studio, Event, Gallery [g]</u>	495	35.515 ksf	1.76	66%	34%	2.31	47%	53%	42	21	63	39	43	82				
<i>Internal Capture [c]</i>									(11)	(5)	(16)	(10)	(11)	(21)				
<i>Transit, Bike, Ped Adjustment [d]</i>			25%			25%												
Net External Gallery (before TNC adjustment)									31	16	47	29	32	61				
Added TNC - from transit			2.5%			2.5%			1	1	2	2	2	4				
Added TNC - from vehicles			2.5%			2.5%			0	1	1	1	1	2				
TNCs already in vehicle trip generation									1	0	1	1	1	2				
Total TNC									2	2	4	4	4	8				
Non-TNC									30	16	46	28	31	59				
Total Vehicle									32	18	50	32	35	67				

**TABLE 2  
PROPOSED PROJECT ALTERNATIVE 2 REVISED TRIP GENERATION  
670 MESQUIT PROJECT**

Land Use	ITE Land Use Code	Size	Trip Generation Rates [a]						Estimated Trip Generation					
			AM Peak Hour			PM Peak Hour			AM Peak Hour Trips			PM Peak Hour Trips		
			Rate	In%	Out%	Rate	In%	Out%	In	Out	Total	In	Out	Total
<b>Gym (Health / Fitness Club)</b>	492	34.000 ksf	1.31	51%	49%	3.45	57%	43%	23	22	45	67	50	117
<i>Internal Capture [c]</i>				24%	27%		48%	62%	(5)	(6)	(11)	(32)	(31)	(63)
<i>Transit, Bike, Ped Adjustment [d]</i>			25%			25%			(5)	(4)	(9)	(9)	(5)	(14)
Net Driveway Trips (before TNC adjustment)									13	12	25	26	14	40
Added TNC - from transit			2.5%			2.5%			1	1	2	1	1	2
Added TNC - from vehicles			2.5%			2.5%			0	0	0	0	1	1
TNCs already in vehicle trip generation									0	0	0	1	0	1
Total TNC									1	1	2	2	2	4
Non-TNC (before pass-by adjustment)									13	12	25	25	14	39
Total Vehicle									14	13	27	27	16	43
<i>Pass-by adjustment [e]</i>			20%			20%			(2)	(2)	(4)	(5)	(2)	(7)
Non-TNC									11	10	21	20	12	32
<b>General Retail</b>	820	14.345 ksf	[h]	62%	38%	[h]	48%	52%	99	60	159	62	67	129
<i>Internal Capture [c]</i>				24%	27%		48%	62%	(23)	(16)	(39)	(30)	(42)	(72)
<i>Transit, Bike, Ped Adjustment [d]</i>			25%			25%			(19)	(11)	(30)	(8)	(6)	(14)
Net Driveway Trips (before TNC adjustment)									57	33	90	24	19	43
Added TNC - from transit			2.5%			2.5%			2	2	4	1	1	2
Added TNC - from vehicles			2.5%			2.5%			1	1	2	0	1	1
TNCs already in vehicle trip generation									1	1	2	1	0	1
Total TNC									4	4	8	2	2	4
Non-TNC (before pass-by adjustment)									56	32	88	23	19	42
Total Vehicle									60	36	96	25	21	46
<i>Pass-by adjustment [e]</i>			40%			40%			(22)	(12)	(34)	(9)	(7)	(16)
Non-TNC									34	20	54	14	12	26
<b>Charter Elementary School</b>	537	300 students	[i]	53%	47%	0.14	35%	65%	167	149	316	15	27	42
<i>Transit, Bike, Ped Adjustment [d]</i>			25%			25%			(42)	(37)	(79)	(4)	(7)	(11)
Total Vehicle									125	112	237	11	20	31
<b>Deck</b>	[j]	1.7 acres	2.6	50%	50%	1.8	50%	50%	2	2	4	2	1	3
Net External Deck (before TNC adjustment)									2	2	4	2	1	3
Added TNC - from transit			2.5%			2.5%			0	0	0	0	0	0
Added TNC - from vehicles			2.5%			2.5%			0	0	0	0	0	0
TNCs already in vehicle trip generation									0	0	0	0	0	0
Total TNC									0	0	0	0	0	0
Non-TNC									2	2	4	2	1	3
Total Vehicle									2	2	4	2	1	3
<b>Farmers' Market</b>	[k]	500 persons	n/a	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	0
<i>Internal Capture [c]</i>									0	0	0	0	0	0
<i>Transit, Bike, Ped Adjustment [d]</i>									0	0	0	0	0	0
Net External Farmers' Market (before TNC adjustment)									0	0	0	0	0	0
Added TNC - from transit			2.5%			2.5%			0	0	0	0	0	0
Added TNC - from vehicles			2.5%			2.5%			0	0	0	0	0	0
TNCs already in vehicle trip generation									0	0	0	0	0	0
Total TNC									0	0	0	0	0	0
Non-TNC									0	0	0	0	0	0
Total Vehicle									0	0	0	0	0	0
<b>Group Exercise Classes</b>	[l]	280 persons	1.0	50%	50%	1.0	50%	50%	140	140	280	140	140	280
<i>Internal Capture [c]</i>				50%	50%		50%	50%	(70)	(70)	(140)	(70)	(70)	(140)
<i>Transit, Bike, Ped Adjustment [d]</i>			25%			25%			(18)	(18)	(36)	(18)	(18)	(36)
Net External Exercise Classes (before TNC adjustment)									52	52	104	52	52	104
Added TNC - from transit			2.5%			2.5%			3	3	6	3	3	6
Added TNC - from vehicles			2.5%			2.5%			1	1	2	1	1	2
TNCs already in vehicle trip generation									1	1	2	1	1	2
Total TNC									5	5	10	5	5	10
Non-TNC									51	51	102	51	51	102
Total Vehicle									56	56	112	56	56	112
<b>Busking</b>	[m]	20 persons	n/a	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	0
<i>Internal Capture [c]</i>									0	0	0	0	0	0
<i>Transit, Bike, Ped Adjustment [d]</i>									0	0	0	0	0	0
Net External Busking (before TNC adjustment)									0	0	0	0	0	0
Added TNC - from transit			2.5%			2.5%			0	0	0	0	0	0
Added TNC - from vehicles			2.5%			2.5%			0	0	0	0	0	0
TNCs already in vehicle trip generation									0	0	0	0	0	0
Total TNC									0	0	0	0	0	0
Non-TNC									0	0	0	0	0	0
Total Vehicle									0	0	0	0	0	0
<b>TOTAL PROJECT DRIVEWAY TRIPS</b>									760	456	1,216	462	684	1,146
<b>NET EXTERNAL VEHICLE TRIPS</b>									782	488	1,270	495	730	1,225
<b>EXISTING USE CREDIT</b>														
Warehousing	150	205.4 ksf	0.17	77%	23%	0.19	27%	73%	27	8	35	11	28	39
<i>Total Existing Use Credit</i>									27	8	35	11	28	39
<b>NET INCREMENTAL EXTERNAL TRIPS</b>									755	480	1,235	484	702	1,186

**TABLE 2  
PROPOSED PROJECT ALTERNATIVE 2 REVISED TRIP GENERATION  
670 MESQUIT PROJECT**

Land Use	ITE Land Use Code	Size	Trip Generation Rates [a]						Estimated Trip Generation					
			AM Peak Hour			PM Peak Hour			AM Peak Hour Trips			PM Peak Hour Trips		
			Rate	In%	Out%	Rate	In%	Out%	In	Out	Total	In	Out	Total

**Notes:**

The proliferation of shared mobility transportation network companies (TNCs), such as Lyft and Uber, in recent years is important to consider in a project of this size. In order to account for TNCs, it was assumed that TNCs would account for 5% of the vehicle trips generated by each land use. Available empirical evidence indicates that TNC trips replace both transit/bike/walk trips and private vehicle trips. Therefore, 2.5% of the TNC trips were considered to replace transit trips, which results in an additional vehicle trip in and out of the site that would not have been considered in the basic trip generation rates. The 2.5% of TNC trips attributed to the replacement of private vehicles result in an additional vehicle trip added only to the opposite movement of the vehicle trip already considered in the basic trip generation rates. TNC vehicles will have a loading/unloading zone at the front of the project site and were not included in the total project driveway trips, but were included in the net external vehicle trips (which do not include pass-by vehicles).

\* Local data collected at high-rise residential sites was approved by LADOT to use for AM and PM peak period trip rates.

[a] Source: Institute of Transportation Engineers (ITE), *Trip Generation, 10th Edition*, 2017.

[b] ITE office trip generation equations used rather than linear trip generation rate:  
 AM Peak Hour:  $Ln(T) = 0.72 * A + 21.64$ , where T = trips, A = area in ksf (Dense Multi-Use Urban equation used)  
 PM Peak Hour:  $Ln(T) = 0.83 * A + 7.99$ , where T = trips, A = area in ksf (Dense Multi-Use Urban equation used)

[c] Internal capture represents the percentage of trips between land uses that occur within the site. This percentage is informed by Multi-Use Trip Generation Methodology described in ITE Trip Generation Handbook, 9th Edition. Internalization percentages are derived from NCHRP Report 684: Enhancing Internal Trip Capture Estimation for Mixed-Use Developments, Transportation Research Board, 2011.

[d] The transit credit is based on LADOT's *Transportation Assessment Guidelines*, July 2020. The guidelines state that up to 15% transit credit may be taken for projects within 1/4 mile of a Rapid bus line. In addition to the 15% transit credit, a 10% walking/biking credit was applied to land uses due to the walkable nature of the area (only 5% walking/biking credit was taken for office land use). For Dense Multi-Use Urban location rates, a transit credit was not explicitly added since the effects of transit are assumed to be implicit in the rates.

[e] The pass-by adjustment is based on Attachment H, Pass-By Trip Rates, from LADOT'S *Transportation Assessment Guidelines*, July 2020.

[f] Trip rates for affordable housing taken from LADOT's *Transportation Assessment Guidelines*, July 2020.

[g] Trip generation rates for recreation center used for Studio, Event, Gallery.

[h] ITE retail trip generation equations used rather than linear trip generation rate:  
 AM Peak Hour:  $Ln(T) = 0.50 * A + 151.78$ , where T = trips, A = area in ksf  
 PM Peak Hour:  $T = 0.74 * Ln(A) + 2.89$ , where T = trips, A = area in ksf

[i] ITE charter elementary school trip generation equation used rather than linear trip generation rate in the AM peak hour:  
 AM Peak Hour:  $Ln(T) = 1.17 * A - 34.68$ , where T = trips, A = number of students

[j] Regional Park (Developed) rate from San Diego Association of Governments, (*Not So*) *Brief Guide of Vehicular Traffic Generation Rates* for the San Diego Region, April 2002.

[k] Weekly farmers market from 11am-2pm, no peak hour trips generated. Assumes an average vehicle occupancy of 2 person per vehicle. A larger monthly farmers' market is planned, but is not be part of the weekday traffic analysis because it is proposed for weekends only.

[l] Group exercise classes are proposed 3-4 times a week, from 7am-9am & 4pm-7pm. Assumes an average vehicle occupancy of 1 person per vehicle and that a class will begin and end (generating both inbound and outbound trips) during the AM and PM peak hours.

[m] Busking is proposed to occur six times a month from 12pm-2pm & 7pm-9pm, no peak hour trips generated. Assumes an average vehicle occupancy of 2 person per vehicle.



**TABLE 3**  
**670 MESQUIT PROJECT**  
**PROJECT AND PROJECT ALTERNATIVE 2 COMPARISON - PEAK HOUR TRIP GENERATION ESTIMATES**

Project Option/Alternative	AM Peak Hour Trips			PM Peak Hour Trips		
	In	Out	Total	In	Out	Total
<b>Proposed Project</b>						
Net New Trips	942	402	1,344	709	979	1,688
<b>Proposed Project with the Deck Concept</b>						
Net New Trips	1,002	462	1,464	768	1,037	1,805
<b>Original Alternative 2 - Reduced Retail</b>						
Net New Trips	927	410	1,337	543	929	1,472
Percent Change: Original Alt 2 vs. Proposed Project			-1%			-13%
Percent Change: Original Alt 2 vs. Proposed Project with the Deck Concept			-9%			-18%
<b>Modified Alternative 2</b>						
Net New Trips	755	480	1,235	484	702	1,186
Percent Change: Modified Alt 2 vs. Proposed Project			-8%			-30%
Percent Change: Modified Alt 2 vs. Proposed Project with the Deck Concept			-16%			-34%
Percent Change: Modified Alt 2 vs. Original Alt 2			-8%			-34%

**TABLE 4  
PROJECT AND PROJECT ALTERNATIVE 2 COMPARISON  
DAILY HOUSEHOLD VMT PER CAPITA AND DAILY WORK VMT PER EMPLOYEE ANALYSIS  
670 MESQUIT PROJECT**

<b>Project Option/Alternative</b>	<b>Daily VMT</b>	<b>Daily Vehicle Trips</b>	<b>Daily Household VMT per Capita</b>	<b>Daily Household VMT per Capita Impact?</b>	<b>Daily Work VMT per Employee</b>	<b>Daily Work VMT per Employee Impact?</b>
<b>Proposed Project</b>	195,304	27,040	4.0	No	6.6	No
<b>Proposed Project with the Deck Concept</b>	198,540	27,493	4.0	No	6.6	No
<b>Original Alternative 2 - Reduced Retail</b>	129,528	17,855	4.4	No	6.2	No
Percent Change: Original Alt 2 vs. Proposed Project	-34%	-34%	10%		-6%	
Percent Change: Original Alt 2 vs. Proposed Project with the Deck Concept	-35%	-35%	10%		-6%	
<b>Modified Alternative 2</b>	109,507	15,336	4.9	No	6.7	No
Percent Change: Modified Alt 2 vs. Proposed Project	-44%	-43%	23%		2%	
Percent Change: Modified Alt 2 vs. Proposed Project with the Deck Concept	-45%	-44%	23%		2%	
Percent Change: Modified Alt 2 vs. Original Alt 2	-15%	-14%	11%		8%	

**TABLE 5  
PROJECT AND PROJECT ALTERNATIVE 2 COMPARISON  
RETAIL VMT ANALYSIS  
670 MESQUIT PROJECT**

	<b>Proposed Project with the Deck Concept</b>	<b>Original Alternative 2 - Reduced Retail</b>	<b>Modified Alternative 2</b>
<b>No Retail</b>	96,866,000	96,924,000	92,760,000
<b>Full Project</b>	96,898,000	96,918,000	92,760,000
<b>Difference</b>	32,000	-6,000	0
<b>Retail VMT Impact?</b>	Yes	No	No

# CITY OF LOS ANGELES VMT CALCULATOR Version 1.4

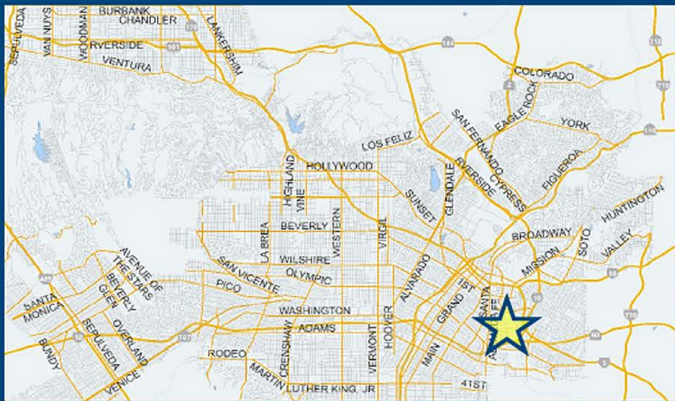


## Project Information

Project:

Scenario:

Address:



Proposed Project Land Use Type	Value	Unit
Office   General Office	676.437	ksf
Retail   Quality Restaurant	14.344	ksf
Retail   High-Turnover Sit-Down Restaurant	14.344	ksf
Housing   Hotel	271	Rooms
Housing   Multi-Family	751	DU
Housing   Affordable Housing - Family	144	DU
Retail   Health Club	87.128	ksf
Retail   Supermarket	4.683	ksf
Retail   General Retail	14.345	ksf
School   Elementary	300	Students

## TDM Strategies

Select each section to show individual strategies  
Use  to denote if the TDM strategy is part of the proposed project or is a mitigation strategy

	Proposed Project	With Mitigation
Max Home Based TDM Achieved?	No	No
Max Work Based TDM Achieved?	No	No

### A Parking

Proposed Prj  Mitigation

Reduce Parking Supply:  city code parking provision for the project site

Proposed Prj  Mitigation  actual parking provision for the project site

Unbundle Parking:  monthly parking cost (dollar) for the project site

Proposed Prj  Mitigation

Parking Cash-Out:  percent of employees eligible

Proposed Prj  Mitigation

Price Workplace Parking:  daily parking charge (dollar)

Proposed Prj  Mitigation  percent of employees subject to priced parking

Residential Area Parking Permits:  cost (dollar) of annual permit

Proposed Prj  Mitigation

- B Transit
- C Education & Encouragement
- D Commute Trip Reductions
- E Shared Mobility
- F Bicycle Infrastructure
- G Neighborhood Enhancement

## Analysis Results

Proposed Project	With Mitigation
<b>15,336</b> Daily Vehicle Trips	<b>15,336</b> Daily Vehicle Trips
<b>109,507</b> Daily VMT	<b>109,507</b> Daily VMT
<b>4.9</b> Household VMT per Capita	<b>4.9</b> Household VMT per Capita
<b>6.7</b> Work VMT per Employee	<b>6.7</b> Work VMT per Employee
<b>Significant VMT Impact?</b>	
<b>Household: No</b> Threshold = 6.0 15% Below APC	<b>Household: No</b> Threshold = 6.0 15% Below APC
<b>Work: No</b> Threshold = 7.6 15% Below APC	<b>Work: No</b> Threshold = 7.6 15% Below APC



Figure 1

VMT Calculator Results for Modified Design Alternative 2

**Attachment A**  
**VMT Analysis Worksheets**

# Modified Design Alternative 2

## CITY OF LOS ANGELES VMT CALCULATOR Version 1.4



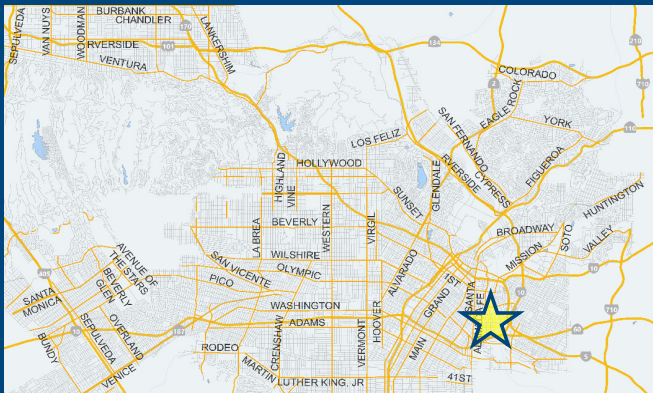
*Project Screening Criteria: Is this project required to conduct a vehicle miles traveled analysis?*

### Project Information

Project:

Scenario:  [WWW](#)

Address:



**Is the project replacing an existing number of residential units with a smaller number of residential units AND is located within one-half mile of a fixed-rail or fixed-guideway transit station?**

Yes  No

### Existing Land Use

Land Use Type	Value	Unit
Industrial   Warehousing/Self-Storage	205.4	ksf

[Click here to add a single custom land use type \(will be included in the above list\)](#)

### Proposed Project Land Use

Land Use Type	Value	Unit
School   Elementary	300	Students
Office   General Office	676.437	ksf
Retail   Quality Restaurant	14.344	ksf
Retail   High-Turnover Sit-Down Restaurant	14.344	ksf
Housing   Hotel	271	Rooms
Housing   Multi-Family	751	DU
Housing   Affordable Housing - Family	144	DU
Retail   Health Club	87.128	ksf
Retail   Supermarket	4.683	ksf
Retail   General Retail	14.345	ksf
School   Elementary	300	Students

[Click here to add a single custom land use type \(will be included in the above list\)](#)

### Project Screening Summary

Existing Land Use	Proposed Project
428 Daily Vehicle Trips	15,846 Daily Vehicle Trips
3,135 Daily VMT	113,152 Daily VMT
Tier 1 Screening Criteria	
Project will have less residential units compared to existing residential units & is within one-half mile of a fixed-rail station. <input type="checkbox"/>	
Tier 2 Screening Criteria	
The net increase in daily trips < 250 trips	15,418 Net Daily Trips
The net increase in daily VMT ≤ 0	110,017 Net Daily VMT
The proposed project consists of only retail land uses ≤ 50,000 square feet total.	134.844 ksf
<b>The proposed project is required to perform VMT analysis.</b>	

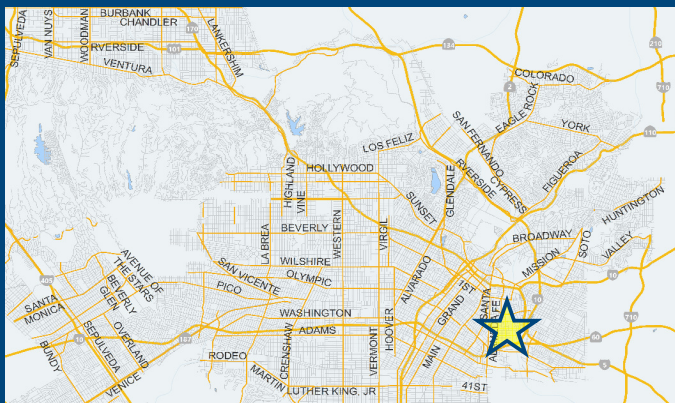


# CITY OF LOS ANGELES VMT CALCULATOR Version 1.4



## Project Information

**Project:** 670 Mesquit  
**Scenario:** Project Alternative 2 Revised  
**Address:** 670 S MESQUIT ST, 90021



Proposed Project Land Use Type	Value	Unit
Office   General Office	676.437	ksf
Retail   Quality Restaurant	14.344	ksf
Retail   High-Turnover Sit-Down Restaurant	14.344	ksf
Housing   Hotel	271	Rooms
Housing   Multi-Family	751	DU
Housing   Affordable Housing - Family	144	DU
Retail   Health Club	87.128	ksf
Retail   Supermarket	4.683	ksf
Retail   General Retail	14.345	ksf
School   Elementary	300	Students

## TDM Strategies

Select each section to show individual strategies  
 Use  to denote if the TDM strategy is part of the proposed project or is a mitigation strategy

**Max Home Based TDM Achieved?** Proposed Project: No, With Mitigation: No  
**Max Work Based TDM Achieved?** Proposed Project: No, With Mitigation: No

**A Parking**

Proposed Prj  Mitigation

**Reduce Parking Supply**  city code parking provision for the project site  
 actual parking provision for the project site

**Unbundle Parking**  Proposed Prj  Mitigation  monthly parking cost (dollar) for the project site

**Parking Cash-Out**  Proposed Prj  Mitigation  percent of employees eligible

**Price Workplace Parking**  Proposed Prj  Mitigation  daily parking charge (dollar)  
 percent of employees subject to priced parking

**Residential Area Parking Permits**  Proposed Prj  Mitigation  cost (dollar) of annual permit

- B Transit**
- C Education & Encouragement**
- D Commute Trip Reductions**
- E Shared Mobility**
- F Bicycle Infrastructure**
- G Neighborhood Enhancement**

## Analysis Results

Proposed Project	With Mitigation
<b>15,336</b> Daily Vehicle Trips	<b>15,336</b> Daily Vehicle Trips
<b>109,507</b> Daily VMT	<b>109,507</b> Daily VMT
<b>4.9</b> Household VMT per Capita	<b>4.9</b> Household VMT per Capita
<b>6.7</b> Work VMT per Employee	<b>6.7</b> Work VMT per Employee

Significant VMT Impact?	
<b>Household: No</b> Threshold = 6.0 15% Below APC	<b>Household: No</b> Threshold = 6.0 15% Below APC
<b>Work: No</b> Threshold = 7.6 15% Below APC	<b>Work: No</b> Threshold = 7.6 15% Below APC



# CITY OF LOS ANGELES VMT CALCULATOR

## Report 1: Project & Analysis Overview

Date: May 8, 2024

Project Name: 670 Mesquit

Project Scenario: Project Alternative 2 Revised

Project Address: 670 S MESQUIT ST, 90021



Version 1.4

Project Information			
	Land Use Type	Value	Units
<b>Housing</b>	<i>Single Family</i>	0	DU
	<b>Multi Family</b>	751	DU
	<i>Townhouse</i>	0	DU
	<b>Hotel</b>	271	Rooms
	<i>Motel</i>	0	Rooms
<b>Affordable Housing</b>	<b>Family</b>	144	DU
	<i>Senior</i>	0	DU
	<i>Special Needs</i>	0	DU
	<i>Permanent Supportive</i>	0	DU
<b>Retail</b>	<b>General Retail</b>	14.345	ksf
	<i>Furniture Store</i>	0.000	ksf
	<i>Pharmacy/Drugstore</i>	0.000	ksf
	<b>Supermarket</b>	4.683	ksf
	<i>Bank</i>	0.000	ksf
	<b>Health Club</b>	87.128	ksf
	<b>High-Turnover Sit-Down Restaurant</b>	14.344	ksf
	<i>Fast-Food Restaurant</i>	0.000	ksf
	<b>Quality Restaurant</b>	14.344	ksf
	<i>Auto Repair</i>	0.000	ksf
	<i>Home Improvement</i>	0.000	ksf
	<i>Free-Standing Discount</i>	0.000	ksf
	<i>Movie Theater</i>	0	Seats
<b>Office</b>	<b>General Office</b>	676.437	ksf
	<i>Medical Office</i>	0.000	ksf
<i>Industrial</i>	<i>Light Industrial</i>	0.000	ksf
	<i>Manufacturing</i>	0.000	ksf
	<i>Warehousing/Self-Storage</i>	0.000	ksf
<b>School</b>	<i>University</i>	0	Students
	<i>High School</i>	0	Students
	<i>Middle School</i>	0	Students
	<b>Elementary</b>	300	Students
	<i>Private School (K-12)</i>	0	Students
<i>Other</i>		0	Trips



# CITY OF LOS ANGELES VMT CALCULATOR

## Report 1: Project & Analysis Overview

Date: May 8, 2024

Project Name: 670 Mesquit

Project Scenario: Project Alternative 2 Revised

Project Address: 670 S MESQUIT ST, 90021



Version 1.4

<b>Analysis Results</b>			
Total Employees: 3,121			
Total Population: 2,144			
<b>Proposed Project</b>		<b>With Mitigation</b>	
15,336	Daily Vehicle Trips	15,336	Daily Vehicle Trips
109,507	Daily VMT	109,507	Daily VMT
4.9	Household VMT per Capita	4.9	Household VMT per Capita
6.7	Work VMT per Employee	6.7	Work VMT per Employee
<b>Significant VMT Impact?</b>			
<b>APC: Central</b>			
Impact Threshold: 15% Below APC Average			
Household = 6.0			
Work = 7.6			
<b>Proposed Project</b>		<b>With Mitigation</b>	
VMT Threshold	Impact	VMT Threshold	Impact
Household > 6.0	No	Household > 6.0	No
Work > 7.6	No	Work > 7.6	No

# CITY OF LOS ANGELES VMT CALCULATOR

## Report 2: TDM Inputs

Date: May 8, 2024

Project Name: 670 Mesquit

Project Scenario: Project Alternative 2 Revised

Project Address: 670 S MESQUIT ST, 90021



Version 1.4

TDM Strategy Inputs				
Strategy Type	Description	Proposed Project	Mitigations	
<b>Parking</b>	<i>Reduce parking supply</i>	<i>City code parking provision (spaces)</i>	0	0
		<i>Actual parking provision (spaces)</i>	0	0
	<i>Unbundle parking</i>	<i>Monthly cost for parking (\$)</i>	\$0	\$0
	<i>Parking cash-out</i>	<i>Employees eligible (%)</i>	0%	0%
	<i>Price workplace parking</i>	<i>Daily parking charge (\$)</i>	\$0.00	\$0.00
		<i>Employees subject to priced parking (%)</i>	0%	0%
	<i>Residential area parking permits</i>	<i>Cost of annual permit (\$)</i>	\$0	\$0
(cont. on following page)				

# CITY OF LOS ANGELES VMT CALCULATOR

## Report 2: TDM Inputs

Date: May 8, 2024

Project Name: 670 Mesquit

Project Scenario: Project Alternative 2 Revised

Project Address: 670 S MESQUIT ST, 90021



Version 1.4

TDM Strategy Inputs, Cont.				
Strategy Type	Description	Proposed Project	Mitigations	
<b>Transit</b>	<i>Reduce transit headways</i>	<i>Reduction in headways (increase in frequency) (%)</i>	0%	
		<i>Existing transit mode share (as a percent of total daily trips) (%)</i>	0%	
		<i>Lines within project site improved (&lt;50%, &gt;=50%)</i>	0	
	<i>Implement neighborhood shuttle</i>	<i>Degree of implementation (low, medium, high)</i>	0	0
		<i>Employees and residents eligible (%)</i>	0%	0%
	<i>Transit subsidies</i>	<i>Employees and residents eligible (%)</i>	0%	0%
<i>Amount of transit subsidy per passenger (daily equivalent) (\$)</i>		\$0.00	\$0.00	
<b>Education &amp; Encouragement</b>	<i>Voluntary travel behavior change program</i>	<i>Employees and residents participating (%)</i>	0%	
	<i>Promotions and marketing</i>	<i>Employees and residents participating (%)</i>	0%	
(cont. on following page)				

# CITY OF LOS ANGELES VMT CALCULATOR

## Report 2: TDM Inputs

Date: May 8, 2024

Project Name: 670 Mesquit

Project Scenario: Project Alternative 2 Revised

Project Address: 670 S MESQUIT ST, 90021



Version 1.4

TDM Strategy Inputs, Cont.				
Strategy Type	Description	Proposed Project	Mitigations	
<b>Commute Trip Reductions</b>	<i>Required commute trip reduction program</i>	<i>Employees participating (%)</i>	0%	0%
	<i>Alternative Work Schedules and Telecommute</i>	<i>Employees participating (%)</i>	0%	0%
		<i>Type of program</i>	0	0
		<i>Degree of implementation (low, medium, high)</i>	0	0
	<i>Employer sponsored vanpool or shuttle</i>	<i>Employees eligible (%)</i>	0%	0%
		<i>Employer size (small, medium, large)</i>	0	0
	<i>Ride-share program</i>	<i>Employees eligible (%)</i>	0%	0%
<b>Shared Mobility</b>	<i>Car share</i>	<i>Car share project setting (Urban, Suburban, All Other)</i>	0	0
	<i>Bike share</i>	<i>Within 600 feet of existing bike share station - OR- implementing new bike share station (Yes/No)</i>	0	0
	<i>School carpool program</i>	<i>Level of implementation (Low, Medium, High)</i>	0	0
(cont. on following page)				

# CITY OF LOS ANGELES VMT CALCULATOR

## Report 2: TDM Inputs

Date: May 8, 2024

Project Name: 670 Mesquit

Project Scenario: Project Alternative 2 Revised

Project Address: 670 S MESQUIT ST, 90021



Version 1.4

TDM Strategy Inputs, Cont.				
Strategy Type	Description	Proposed Project	Mitigations	
<b>Bicycle Infrastructure</b>	<i>Implement/Improve on-street bicycle facility</i>	<i>Provide bicycle facility along site (Yes/No)</i>	0	0
	Include Bike parking per LAMC	Meets City Bike Parking Code (Yes/No)	Yes	Yes
	Include secure bike parking and showers	Includes indoor bike parking/lockers, showers, & repair station (Yes/No)	Yes	Yes
<b>Neighborhood Enhancement</b>	<i>Traffic calming improvements</i>	<i>Streets with traffic calming improvements (%)</i>	0%	0%
		<i>Intersections with traffic calming improvements (%)</i>	0%	0%
	Pedestrian network improvements	Included (within project and connecting off-site/within project only)	within project and connecting off-site	within project and connecting off-site

# CITY OF LOS ANGELES VMT CALCULATOR

## Report 3: TDM Outputs

Date: May 8, 2024  
 Project Name: 670 Mesquit  
 Project Scenario: Project Alternative 2 Revised  
 Project Address: 670 S MESQUIT ST, 90021



Version 1.4

### TDM Adjustments by Trip Purpose & Strategy

Place type: Suburban Center

		Home Based Work Production		Home Based Work Attraction		Home Based Other Production		Home Based Other Attraction		Non-Home Based Other Production		Non-Home Based Other Attraction		Source
		Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	
		<b>Parking</b>	Reduce parking supply	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Unbundle parking	0%		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Parking cash-out	0%		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Price workplace parking	0%		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Residential area parking permits	0.00%		0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
<b>Transit</b>	Reduce transit headways	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	TDM Strategy Appendix, Transit sections 1 - 3
	Implement neighborhood shuttle	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
	Transit subsidies	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
<b>Education &amp; Encouragement</b>	Voluntary travel behavior change program	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	TDM Strategy Appendix, Education & Encouragement sections 1 - 2
	Promotions and marketing	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
<b>Commute Trip Reductions</b>	Required commute trip reduction program	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	TDM Strategy Appendix, Commute Trip Reductions sections 1 - 4
	Alternative Work Schedules and Telecommute Program	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
	Employer sponsored vanpool or shuttle	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
	Ride-share program	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
<b>Shared Mobility</b>	Car-share	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	TDM Strategy Appendix, Shared Mobility sections 1 - 3
	Bike share	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
	School carpool program	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	

# CITY OF LOS ANGELES VMT CALCULATOR

## Report 3: TDM Outputs

Date: May 8, 2024  
 Project Name: 670 Mesquit  
 Project Scenario: Project Alternative 2 Revised  
 Project Address: 670 S MESQUIT ST, 90021



Version 1.4

### TDM Adjustments by Trip Purpose & Strategy, Cont.

#### Place type: Suburban Center

		Home Based Work Production		Home Based Work Attraction		Home Based Other Production		Home Based Other Attraction		Non-Home Based Other Production		Non-Home Based Other Attraction		Source
		Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	
		<b>Bicycle Infrastructure</b>	Implement/ Improve on-street bicycle facility	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
	Include Bike parking per LAMC	0.6%	0.6%	0.6%	0.6%	0.6%	0.6%	0.6%	0.6%	0.6%	0.6%	0.6%	0.6%	
	Include secure bike parking and showers	0.6%	0.6%	0.6%	0.6%	0.6%	0.6%	0.6%	0.6%	0.6%	0.6%	0.6%	0.6%	
<b>Neighborhood Enhancement</b>	Traffic calming improvements	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	TDM Strategy Appendix, Neighborhood Enhancement sections 1 - 2
	Pedestrian network improvements	2.0%	2.0%	2.0%	2.0%	2.0%	2.0%	2.0%	2.0%	2.0%	2.0%	2.0%	2.0%	

### Final Combined & Maximum TDM Effect

	Home Based Work Production		Home Based Work Attraction		Home Based Other Production		Home Based Other Attraction		Non-Home Based Other Production		Non-Home Based Other Attraction	
	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated
	<b>COMBINED TOTAL</b>	3%	3%	3%	3%	3%	3%	3%	3%	3%	3%	3%
<b>MAX. TDM EFFECT</b>	3%	3%	3%	3%	3%	3%	3%	3%	3%	3%	3%	3%

$$= \text{Minimum}(X\%, 1 - [(1-A) * (1-B) \dots])$$

where X%=

<b>PLACE</b>	urban	75%
<b>TYPE</b>	compact infill	40%
<b>MAX:</b>	suburban center	20%
	suburban	15%

Note:  $(1 - [(1-A) * (1-B) \dots])$  reflects the dampened combined effectiveness of TDM Strategies (e.g., A, B, ...). See the TDM Strategy Appendix (*Transportation Assessment Guidelines Attachment G*) for further discussion of dampening.

# CITY OF LOS ANGELES VMT CALCULATOR

## Report 4: MXD Methodology

Date: May 8, 2024

Project Name: 670 Mesquit

Project Scenario: Project Alternative 2 Revised

Project Address: 670 S MESQUIT ST, 90021



Version 1.4

### MXD Methodology - Project Without TDM

	Unadjusted Trips	MXD Adjustment	MXD Trips	Average Trip Length	Unadjusted VMT	MXD VMT
Home Based Work Production	795	-40.0%	477	7.4	5,883	3,530
Home Based Other Production	2,201	-36.9%	1,388	5.3	11,665	7,356
Non-Home Based Other Production	3,486	-4.2%	3,341	7.9	27,539	26,394
Home-Based Work Attraction	3,553	-27.4%	2,580	8.4	29,845	21,672
Home-Based Other Attraction	7,866	-30.4%	5,475	6.5	51,129	35,588
Non-Home Based Other Attraction	2,708	-4.5%	2,585	7.2	19,498	18,612

### MXD Methodology with TDM Measures

	<i>Proposed Project</i>			<i>Project with Mitigation Measures</i>		
	TDM Adjustment	Project Trips	Project VMT	TDM Adjustment	Mitigated Trips	Mitigated VMT
Home Based Work Production	-3.2%	462	3,416	-3.2%	462	3,416
Home Based Other Production	-3.2%	1,343	7,119	-3.2%	1,343	7,119
Non-Home Based Other Production	-3.2%	3,233	25,544	-3.2%	3,233	25,544
Home-Based Work Attraction	-3.2%	2,497	20,974	-3.2%	2,497	20,974
Home-Based Other Attraction	-3.2%	5,299	34,442	-3.2%	5,299	34,442
Non-Home Based Other Attraction	-3.2%	2,502	18,012	-3.2%	2,502	18,012

### MXD VMT Methodology Per Capita & Per Employee

Total Population: 2,144

Total Employees: 3,121

APC: Central

	<i>Proposed Project</i>	<i>Project with Mitigation Measures</i>
<i>Total Home Based Production VMT</i>	<b>10,535</b>	<b>10,535</b>
<i>Total Home Based Work Attraction VMT</i>	<b>20,974</b>	<b>20,974</b>
<i>Total Home Based VMT Per Capita</i>	<b>4.9</b>	<b>4.9</b>
<i>Total Work Based VMT Per Employee</i>	<b>6.7</b>	<b>6.7</b>