Appendix A

IS/NOP/NOP Responses

October 22, 2009

NOTICE OF PREPARATION
ENVIRONMENTAL IMPACT REPORT

EIR NO.: ENV-2009-3345-EIR
PROJECT LOCATION/ADDRESS: Northeast corner of Alameda Street and First Street, City of Los Angeles, County of Los Angeles
COMMUNITY PLANNING AREA: Central City North
COUNCIL DISTRICT: 9 (Jan Perry)
DUE DATE FOR PUBLIC COMMENTS: November 23, 2009

The City of Los Angeles, Department of City Planning, will be the Lead Agency and will require the preparation of an Environmental Impact Report (EIR) for the project identified herein (the "Project"). The Department of City Planning requests your comments as to the scope and content of the EIR.

The Project description, location, and the potential environmental effects are set forth below. The environmental file is available for review at the Department of City Planning, 200 North Spring Street, Room 667, Los Angeles, CA 90012.

PROJECT DESCRIPTION: The proposed project involves a General Plan amendment and other necessary approvals to allow for the development of mixed retail, office, community space, creative live/work units and residential development adjacent to the new Little Tokyo/Arts District Gold Line light rail transit station. Although no specific development is proposed at this time, it is anticipated that the project site could accommodate a maximum of 1.2 million square (sf) feet of floor space. The maximum amount of each of specific use that could be accommodated at the site is as follows:

- *Retail: 200,000 sf*
- *Office: 500,000 sf*
- *Community Space: 25,000 sf*
- *Creative Live/Work: 75,000 sf (83 units)*
- *Residential: 400,000 sf (445 units)*

The average size of the proposed residential units and creative live/work units is estimated at 900 sf. It is anticipated that approximately 75% of the floor space of each creative live/work unit would be devoted to living area and 25% would be commercial space. Parking would be provided onsite, primarily in subterranean levels. However, it is expected that some parking, including loading/unloading spaces, would be provided at-grade. The maximum height of onsite development is anticipated to be 16 stories above-grade.

Although the maximum amount of onsite development would be 1.2 million sf, the size of each project component could vary from what is shown above. As such, an "equivalency table" will be developed as part of the environmental review to determine what changes in the mix of onsite uses would result in impacts equivalent to or lower than those studied as part of the environmental review.

As part of the proposed project, Hewitt Street would be extended north through First Street, up to East Temple Street. The alignment of the proposed Hewitt Street extension forms the eastern boundary of the project site. In addition, the portions of Banning Street and Turner Street that run through the project site that are currently closed to traffic would be vacated.

In order to accommodate the proposed project, an existing 19,500 sf office building and surface parking lot onsite would be demolished. In addition, future onsite construction would include excavation, grading and other site preparation activities.

PROJECT LOCATION: The project site is located at the northeast corner of Alameda Street and First Street on the edge of the Little Tokyo community, in the City of Los Angeles, County of Los Angeles. The attached figure shows the location of the project site within the site vicinity.

REQUESTED PERMITS/APPROVALS: The City of Los Angeles has sole discretion to approve the Mangrove Estates Site Mixed Use Project. Project approval may entail the approval of:

- *General Plan Amendment*
- *Zone and Height District change*
- *Tract Map/Subdivision*
- *Street Vacations (Turner Street and Banning Street; both of which are currently closed to traffic)*
- *Site Plan Review*
- *Variances for Parking Reductions*
- *Other related entitlements as necessary*

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED: An Initial Study (IS) was completed to determine the areas of focus for the EIR. As discussed in the IS, the following issues will be included in the EIR: Aesthetics, Air Quality, Cultural Resources, Geology/Soils, Hazards and Hazardous Materials, Hydrology/Water Quality, Land Use/Planning, Noise, Public Services, Recreation, Transportation/Traffic and Utilities/Service Systems. All other environmental issues have been found to be less than significant.

You are being notified of the City of Los Angeles' intent, as Lead Agency, to prepare an EIR for this Proposed Project, which is located in an area of interest to you and/or the organization you represent. This EIR will be prepared by outside consultants and submitted to the Department of City Planning, Environmental Review Section, for certification.

PUBLIC SCOPING MEETING: Pursuant to the public participation goals of CEQA, the City of Los Angeles will host an EIR Scoping Meeting to gather additional input on the content and focus of the environmental analysis to be conducted and presented in the EIR. **The scoping meeting will be held on Tuesday, November 3, 2009, from 6:30 PM to 8:00 PM, in the Lotus Room at the Hompa Hongwanji Buddhist Temple located at 815 East First Street, Los Angeles, California, 90012.** Parking is available at the temple. Enter through the Vignes Street driveway on the east side of the temple.

COMMENTING ON THE SCOPE OF THE EIR: The Environmental Review Section welcomes all comments regarding environmental impacts of the Project. All comments will be considered in the preparation of the EIR. Written comments must be submitted to this office by November 23, 2009.

Please direct your comments to:

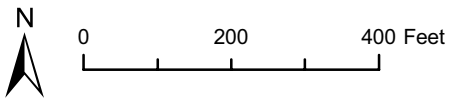
Steven Wechsler, Community Planner
Department of City Planning, Mail Stop 395
200 N. Spring Street, Room 667
Los Angeles, CA 90012
(213) 978-1163
(213) 978-1477 (Fax)
steven.wechsler@lacity.org

S. Gail Goldberg, AICP
Director of Planning

Steven Wechsler
Community Planner

Enclosures: Site Map

Aerial source: Google Earth Pro, 2009.



Site Map

DEPARTMENT OF TRANSPORTATION
DISTRICT 7, OFFICE OF PUBLIC
TRANSPORTATION AND REGIONAL PLANNING
IGR/CEQA BRANCH
100 SOUTH MAIN STREET
LOS ANGELES, CA 90012
PHONE (213) 897-6696
FAX (213) 897-1337

Flex your power!
Be energy efficient!

November 2, 2009

IGR/CEQA NOP CS/091048
City of Los Angeles
Mangrove Estates Site Mixed Use
Development Project
Vic. LA-101-0.6; SCH# 2009101091

Mr. Steven Wechsler
City of Los Angeles
Department of City Planning
200 N. Spring Street,
City Hall Office 667, MS 395
Los Angeles, CA 90012

Dear Mr. Wechsler:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Notice of Preparation (NOP) of an Environmental Impact Report for the Mangrove Estates Site Mixed Use Development Project, ENV-2009-3345-EIR. The project site is located at the northeast corner of Alameda Street and First Street. The project would allow for the development of mixed retail, office, community space, creative live/work units and residential development adjacent to the new Little Tokyo/Arts District Gold Line light rail transit station. Based on the information received, we have the following comments:

It is anticipated that the project site could accommodate a maximum of 1.2 million square feet of floor space including retail 200,000 SF, office 500,000 SF, community space 25,000 SF, 83 units creative live/work 75,000 SF, and 445 units residential 400,000 SF. Based on the magnitude of the proposed project, the project may result in regionally significant traffic impacts including possible impacts to the State Highway System.

A traffic study will be needed to evaluate the impact to the State Highway System including, but not limited to the US101 Santa Ana Freeway First Street and Alameda Street interchanges. The traffic study will need to include trip generation, trip distribution, mode choice, and trip assignment. A select zone analysis will be needed to determine the project-related distribution of trips on the transportation network.

An analysis of traffic volumes will need to include: existing volumes, existing plus project volumes, existing plus Cumulative traffic volumes, and existing plus cumulative plus project traffic volumes.

Level-of-service analysis will need to be conducted for critical intersections including at freeway ramp intersections using the HCM methodology. A discussion of intersections operating at poor level-of-service will be needed including project related traffic mitigation measures. HCM analysis will be needed for affected freeway off-ramps to determine freeway queue lengths based on the additional peak period trips generated by the project.

A cumulative analysis will also be needed to determine the traffic impacts resulting from all approved and proposed land-use projects in the area. To address potential cumulative transportation impacts on the State Highway System, we recommend that the City implement traffic mitigation measures such as an impact fee program, private funding for traffic improvement projects or fair-share funding for highway improvement projects.

Transport of over-size or over-weight vehicles on State highways will need a Caltrans Transportation Permit. We recommend that construction related truck trips on State highways be limited to off-peak commute periods. The contractor should avoid platooning of truck trips on mainline freeways, on freeway on/off-ramps and at freeway ramp intersections.

If you have any questions, you may reach me at (213) 897-6696 and please refer to our record number 091048/CS.

Sincerely,

Elmer Alvarez

ELMER ALVAREZ
IGR/CEQA Program Manager
Office of Regional Planning

cc: Scott Morgan, State Clearinghouse

Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012-2952
213.922.2000 Tel
metro.net

Metro

November 13, 2009

Mr. Steven Wechsler
Community Planner
Department of City Planning, Mail Stop 395
200 N. Spring Street, Room 667
Los Angeles, CA 90012

Dear Mr. Wechsler:

Thank you for the opportunity to comment on the Notice of Preparation (NOP) for project EIR No. ENV-2009-3345-EIR located in Little Tokyo near the Gold Line. This letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (Metro) concerning issues that are germane to our agency's statutory responsibilities in relation to the proposed project.

A Traffic Impact Analysis (TIA), with highway, freeway, and transit components, is required under the State of California Congestion Management Program (CMP) statute. The CMP TIA Guidelines are published in the "2004 Congestion Management Program for Los Angeles County", Appendix B. The geographic area examined in the TIA must include the following, at a minimum:

1. All CMP arterial monitoring intersections, including monitored freeway on/off-ramp intersections, where the proposed project will add 50 or more trips during either the a.m. or p.m. weekday peak hour (of adjacent street traffic); and
2. Mainline freeway-monitoring locations where the project will add 150 or more trips, in either direction, during either the a.m. or p.m. weekday peak hour.

Among the required steps for the analysis of development-related impacts to transit are:

3. Evidence that in addition to Metro, all affected Municipal transit operators received the NOP for the Draft EIR;
4. A summary of the existing transit services in the area;
5. Estimated project trip generation and mode assignment for both morning and evening peak periods;
6. Documentation on the assumptions/analyses used to determine the number and percentage of trips assigned to transit;
7. Information on facilities and/or programs that will be incorporated into the development plan that will encourage public transit usage and transportation demand management (TDM) policies and programs; and
8. An analysis of the expected project impacts on current and future transit services along with proposed project mitigation.

Metro looks forward to reviewing the Draft EIR. If you have any questions regarding this response, please call me at 213-922-6908 or by email at chapmans@metro.net. Please send the Draft EIR to the following address:

Metro CEQA Review Coordination
One Gateway Plaza MS 99-23-2
Los Angeles, CA 90012-2952
Attn: Susan Chapman

Sincerely,

Susan Chapman
Program Manager, Long Range Planning

STATE OF CALIFORNIA

GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH

STATE CLEARINGHOUSE AND PLANNING UNIT

ARNOLD SCHWARZENEGGER
GOVERNOR

CYNTHIA BRYANT
DIRECTOR

Notice of Preparation

October 26, 2009

To: Reviewing Agencies

Re: Mangrove Estates Site Mixed Use Development
SCH# 2009101091

Attached for your review and comment is the Notice of Preparation (NOP) for the Mangrove Estates Site Mixed Use Development draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Steven Wechsler
City of Los Angeles
200 N. Spring Street
City Hall Office 667, MS 395
Los Angeles, CA 90012

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

for, Scott Morgan
Acting Director, State Clearinghouse

Attachments
cc: Lead Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 · FAX (916) 323-3018 www.opr.ca.gov

Document Details Report
State Clearinghouse Data Bas

SCH# 2009101091
Project Title Mangrove Estates Site Mixed Use Development
Lead Agency Los Angeles, City of

Type NOP Notice of Preparation

Description The development of mixed retail, office, community space, creative live/work units and residential development. Although no specific development is proposed at this time, it is anticipated that the project site could accommodate a maximum of 1.2 million square feet (sf) of floor space. Anticipated development on the project site includes an estimated 200k sf of retail space, 500k sf of office space, 25k sf of community space, 18.75k sf of commercial space within 83 live/work units and 445 multiple family residences.

Lead Agency Contact

Name Steven Wechsler
Agency City of Los Angeles
Phone 213-978-1163 **Fax**
email
Address 200 N. Spring Street
City Hall Office 667, MS 395
City Los Angeles **State** CA **Zip** 90012

Project Location

County Los Angeles
City Los Angeles, City of
Region
Cross Streets North Alameda Street ad East First Street
Lat / Long 34° 02' 58" N / 118° 14' 12" W
Parcel No.
Township **Range** **Section** **Base**

Proximity to:

Highways State Route 110
Airports
Railways Metrolink, Amtrak
Waterways Los Angeles River
Schools LA Universal Preschool
Land Use PLU: parking lot
Zoning: Commercial and Heavy Manufacturing
GP Des: Regional Commercial and Heavy Manufacturing

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Drainage/Absorption; Economics/Jobs; Flood Plain/Flooding; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Water Quality; Water Supply; Growth Inducing; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; Department of Conservation; Department of Parks and Recreation; Department of Water Resources; Department of Fish and Game, Region 5; Native American Heritage Commission; CA Department of Public Health; California Highway Patrol; Department of Housing and Community Development; Caltrans, District 7; Department of Toxic Substances Control; Regional Water Quality Control Board, Region 4

Date Received 10/26/2009 **Start of Review** 10/26/2009 **End of Review** 11/24/2009

Note: Blanks in data fields result from insufficient information provided by lead agency.

NOP Distribution List

County: Los Angeles

SCH#

Resources Agency

- [x] **Resources Agency**
  Nadell Gayou
- [ ] **Dept. of Boating & Waterways**
  Mike Sotelo
- [ ] **California Coastal Commission**
  Elizabeth A. Fuchs
- [ ] **Colorado River Board**
  Gerald R. Zimmerman
- [ ] **Dept. of Conservation**
  Rebecca Salazar
- [ ] **California Energy Commission**
  Eric Knight
- [ ] **Cal Fire**
  Allen Robertson
- [ ] **Office of Historic Preservation**
  Wayne Donaldson
- [x] **Dept of Parks & Recreation**
  Environmental Stewardship Section
- [ ] **Central Valley Flood Protection Board**
  James Herota
- [ ] **S.F. Bay Conservation & Dev't. Comm.**
  Steve McAdam
- [ ] **Dept. of Water Resources**
  Resources Agency
  Nadell Gayou
- [ ] _____
  Conservancy

Fish and Game

- [ ] **Depart. of Fish & Game**
  Scott Flint
  Environmental Services Division
- [ ] **Fish & Game Region 1**
  Donald Koch
- [ ] **Fish & Game Region 1E**
  Laurie Harnsberger
- [ ] **Fish & Game Region 2**
  Jeff Drongesen
- [ ] **Fish & Game Region 3**
  Robert Floerke
- [ ] **Fish & Game Region 4**
  Julie Vance
- [x] **Fish & Game Region 5**
  Don Chadwick
  Habitat Conservation Program
- [ ] **Fish & Game Region 6**
  Gabrina Gatchel
  Habitat Conservation Program
- [ ] **Fish & Game Region 6 I/M**
  Brad Henderson
  Inyo/Mono, Habitat Conservation Program
- [ ] **Dept. of Fish & Game M**
  George Isaac
  Marine Region

Other Departments

- [ ] **Food & Agriculture**
  Steve Shaffer
  Dept. of Food and Agriculture
- [ ] **Depart. of General Services**
  Public School Construction
- [ ] **Dept. of General Services**
  Anna Garbeff
  Environmental Services Section
- [ ] **Dept. of Public Health**
  Bridgette Binning
  Dept. of Health/Drinking Water

Independent Commissions,Boards

- [ ] **Delta Protection Commission**
  Linda Flack
- [ ] **Office of Emergency Services**
  Dennis Castrillo
- [ ] **Governor's Office of Planning & Research**
  State Clearinghouse
- [x] **Native American Heritage Comm.**
  Debbie Treadway
- [ ] **Public Utilities Commission**
  Leo Wong
- [ ] **Santa Monica Bay Restoration**
  Guangyu Wang
- [ ] **State Lands Commission**
  Marina Brand
- [ ] **Tahoe Regional Planning Agency (TRPA)**
  Cherry Jacques

Business, Trans & Housing

- [ ] **Caltrans - Division of Aeronautics**
  Sandy Hesnard
- [ ] **Caltrans - Planning**
  Terri Pencovic
- [ ] **California Highway Patrol**
  Scott Loetscher
  Office of Special Projects
- [ ] **Housing & Community Development**
  CEQA Coordinator
  Housing Policy Division

Dept. of Transportation

- [ ] **Caltrans, District 1**
  Rex Jackman
- [ ] **Caltrans, District 2**
  Marcelino Gonzalez
- [ ] **Caltrans, District 3**
  Bruce de Terra
- [ ] **Caltrans, District 4**
  Lisa Carboni
- [ ] **Caltrans, District 5**
  David Murray
- [ ] **Caltrans, District 6**
  Michael Navarro
- [x] **Caltrans, District 7**
  Elmer Alvarez
- [ ] **Caltrans, District 8**
  Dan Kopulsky
- [ ] **Caltrans, District 9**
  Gayle Rosander
- [ ] **Caltrans, District 10**
  Tom Dumas
- [ ] **Caltrans, District 11**
  Jacob Armstrong
- [ ] **Caltrans, District 12**
  Chris Herre

Cal EPA

Air Resources Board

- [ ] Airport Projects
  Jim Lerner
- [ ] Transportation Projects
  Douglas Ito
- [ ] Industrial Projects
  Mike Tollstrup
- [ ] **California Integrated Waste Management Board**
  Sue O'Leary
- [ ] **State Water Resources Control Board**
  Regional Programs Unit
  Division of Financial Assistance
- [ ] **State Water Resources Control Board**
  Student Intern, 401 Water Quality Certification Unit
  Division of Water Quality
- [ ] **State Water Resouces Control Board**
  Steven Herrera
  Division of Water Rights
- [x] **Dept. of Toxic Substances Control**
  CEQA Tracking Center
- [ ] **Department of Pesticide Regulation**
  CEQA Coordinator

Regional Water Quality Control Board (RWQCB)

- [ ] **RWQCB 1**
  Cathleen Hudson
  North Coast Region (1)
- [ ] **RWQCB 2**
  Environmental Document Coordinator
  San Francisco Bay Region (2)
- [ ] **RWQCB 3**
  Central Coast Region (3)
- [x] **RWQCB 4**
  Teresa Rodgers
  Los Angeles Region (4)
- [ ] **RWQCB 5S**
  Central Valley Region (5)
  - [ ] **RWQCB 5F**
    Central Valley Region (5)
    Fresno Branch Office
  - [ ] **RWQCB 5R**
    Central Valley Region (5)
    Redding Branch Office
- [ ] **RWQCB 6**
  Lahontan Region (6)
  - [ ] **RWQCB 6V**
    Lahontan Region (6)
    Victorville Branch Office
- [ ] **RWQCB 7**
  Colorado River Basin Region (7)
- [ ] **RWQCB 8**
  Santa Ana Region (8)
- [ ] **RWQCB 9**
  San Diego Region (9)

- [ ] **Other** _____

Last Updated on 10/21/2009

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

October 30, 2009

Mr. Steven Wechsler
Community Planner
Department of City Planning, Mail Stop 395
200 N. Spring Street, Room 667
Los Angeles, CA 90012

Dear Mr. Wechsler:

Notice of Preparation of a Draft Environmental Impact Report (Draft EIR) for the ENV-2009-3345-EIR

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the draft environmental impact report (EIR). Please send the SCAQMD a copy of the Draft EIR upon its completion. **In addition, please send with the draft EIR all appendices or technical documents related to the air quality analysis and electronic versions of all air quality modeling and health risk assessment files. Electronic files include spreadsheets, database files, input files, output files, etc., and does not mean Adobe PDF files. Without all files and supporting air quality documentation, the SCAQMD will be unable to complete its review of the air quality analysis in a timely manner. Any delays in providing all supporting air quality documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. Alternatively, the lead agency may wish to consider using the California Air Resources Board (CARB) approved URBEMIS 2007 Model. This model is available on the SCAQMD Website at: www.urbemis.com.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.

The SCAQMD has developed a methodology for calculating PM2.5 emissions from construction and operational activities and processes. In connection with developing PM2.5 calculation methodologies, the SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD requests that the lead agency quantify PM2.5 emissions and compare the results to the recommended PM2.5 significance thresholds. Guidance for calculating PM2.5 emissions and PM2.5 significance thresholds can be found at the following internet address: http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.html.

In addition to analyzing regional air quality impacts the SCAQMD recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LST's can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a localized significance analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at http://www.aqmd.gov/ceqa/handbook/LST/LST.html.

In the event that the proposed project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the lead agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis") can be found on the SCAQMD's CEQA web pages at the following internet address: http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html. An analysis of all toxic air contaminant impacts due to the decommissioning or use of equipment potentially generating such air pollutants should also be included.

Mitigation Measures

In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate significant adverse air quality impacts. To assist the Lead Agency with identifying possible mitigation measures for the project, please refer to Chapter 11 of the SCAQMD CEQA Air Quality Handbook for sample air quality mitigation measures. Additional mitigation measures can be found on the SCAQMD's CEQA web pages at the following internet address: www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html Additionally, SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook contain numerous measures for controlling construction-related emissions that should be considered for use as CEQA mitigation if not otherwise required. Other measures to reduce air quality impacts from land use projects can be found in the SCAQMD's Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. This document can be found at the following internet address: http://www.aqmd.gov/prdas/aqguide/aqguide.html. In addition, guidance on siting incompatible land uses can be found in the California Air Resources Board's Air Quality and Land Use Handbook: A Community Perspective, which can be found at the following internet address: http://www.arb.ca.gov/ch/handbook.pdf. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. Pursuant to state CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed.

Data Sources

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD's World Wide Web Homepage (http://www.aqmd.gov).

The SCAQMD is willing to work with the Lead Agency to ensure that project-related emissions are accurately identified, categorized, and evaluated. Please call Daniel Garcia, Air Quality Specialist, CEQA Section, at (909) 396-3304 if you have any questions regarding this letter.

Sincerely,

Susan Nakamura
Planning Manager
Planning, Rule Development and Area Sources

SN:DG:AK
LAC091023-02
Control Number

STATE OF CALIFORNIA ARNOLD SCHWARZENEGGER, *Governor*

PUBLIC UTILITIES COMMISSION
320 WEST 4TH STREET, SUITE 500
LOS ANGELES, CA 90013

November 12, 2009

Steven Wesher
City of Los Angeles
City Hall Office 667, MS 395
200 N. Spring Street
Los Angeles, CA 90012

Dear Mr. Wesher:

Re: SCH# 2009101091; Mangrove Estates Site Mixed Use Development

The California Public Utilities Commission (Commission) has jurisdiction over the safety of highway-rail crossings (crossings) in California. The California Public Utilities Code requires Commission approval for the construction or alteration of crossings and grants the Commission exclusive power on the design, alteration, and closure of crossings.

The Commission's Rail Crossing Engineering Section (RCES) Staff is in receipt of the City of Los Angeles' (City) ***Notice of Preparation (NOP) for the Mangrove Estates Site Mixed Use Development*** and has reviewed the notice for impacts to highway-rail crossing safety. This letter summarizes our comments and concerns.

The City proposes to create a "mixed retail, office, community space, creative live/work and residential development" with commercial adjacent to the new Little Tokyo/Arts District Gold Line light rail station at the northeast corner of Alameda Street and First Street. In addition, the City proposes to extend north through First Street, Hewitt Street across the Los Angeles County Metropolitan Transportation Authority's (LACMTA) Gold line East Side extension light rail tracks up to East Temple Street.

The project is subject to a number of rules and regulations involving the CPUC. These may include: Sections 1201 et al, and 99152 of Sate of California Public Utilities Code, which requires Commission authority to construct new roadways over existing rail lines. The design criteria of the proposed project must comply with CPUC General Orders (GOs), such as, GO 72-B rules governing the construction and maintenance of crossings at grade of railroads with public streets, roads and highways; and GO 75-D regulations governing standards for warning devices for at-grade highway-rail crossings.

Based on our review of your NOP notice, we have identified three specific concerns: Residential Vehicular access along First Street, Residential Pedestrian access along Alameda Street and Little Tokyo/Arts District Gold Line Station, Residential and Commercial access along First Street.

Your Environmental Impact Report should address the hazards and impacts that at-grade crossings of the Gold Line tracks pose to vehicles and pedestrians accessing your mixed-use commercial and residential development project. Potential impacts may include vehicular traffic congestion and queuing onto rail tracks, pedestrian safety along the tracks, and noise and vibration impacts do to Gold Line train operations.

We understand that this is a highly complex and challenging project with funding, design and environmental approval for the City of Los Angeles. It is imperative that the Commission be involved with the details of this project from its inception in order to be informed and to be of greater assistance in the future.

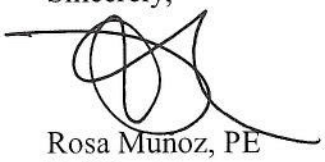
The Commission will need to provide applicable regulatory oversight for all rail-related phases of the project. This will require early consultation with not only City staff but land developers and contracted consultants as well in order to provide early consultation on all proposed design and engineering of the proposed project improvements affecting the Gold Line rail corridor adjacent to your project.

This will assist with the review of the environmental documents and final CEQA approval of the project by the Commission, since we are a responsible agency under CEQA section 15381 with regard to this project and in complying with any and all General Order requirements as they apply to the Mangrove Estates Project.

Thank you very much for the opportunity to review and comment on your NOP. RCES staff is available to meet with you and discuss our concerns.

We look forward to working with the City on this project. Please contact Jose Pereyra, Utilities Engineer at 213-576-7085, or me at rxm@cpuc.ca.gov, 213-576-7078.

Sincerely,



Rosa Muñoz, PE
Utilities Engineer
Rail Crossings Engineering Section
Consumer Protection & Safety Division

C: Vijay Khawani, LACMTA

SOUTHERN CALIFORNIA

ASSOCIATION of GOVERNMENTS

Main Office

818 West Seventh Street

12th Floor

Los Angeles, California

90017-3435

t (213) 236-1800

f (213) 236-1825

www.scag.ca.gov

November 17, 2009

Mr. Steven Wechsler
Community Planner
Mail Stop 395
200 N. Spring Street
Room 667
Los Angeles, CA 90012
steven.wechsler@lacity.org

RE: SCAG Comments on the Notice of Preparation of an Environmental Impact Report for the Mangrove Estates Site Mixed Use Project [I20090645]

Dear Mr. Wechsler,

Thank you for submitting the **Notice of Preparation of an Environmental Impact Report for the Mangrove Estates Site Mixed Use Project [I20090645]** to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review of Programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12372 (replacing A-95 Review). Additionally, pursuant to Public Resources Code Section 21083(d) SCAG reviews Environmental Impact Reports of projects of regional significance for consistency with regional plans per the California Environmental Quality Act Guidelines, Sections 15125(d) and 15206(a)(1). SCAG is also the designated Regional Transportation Planning Agency and as such is responsible for both preparation of the Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP) under California Government Code Section 65080 and 65082.

SCAG staff has reviewed this project and determined that the proposed project is regionally significant per California Environmental Quality Act (CEQA) Guidelines, Sections 15125 and/or 15206. The proposed project involves a General Plan amendment and other necessary approvals to allow for the development of a mixed use project with up to 1.2 million square feet comprising retail, office, community space, creative live/work units and residential uses, adjacent to the new Little Tokyo/Arts District Gold Line light rail transit station.

Policies of SCAG's Regional Transportation Plan (RTP) and Compass Growth Visioning (CGV) that may be applicable to your project are outlined in the attachment. The RTP, CGV, and table of policies can be found on the SCAG web site at: http://scag.ca.gov/igr. For ease of review, we would encourage you to use a side-by-side comparison of all SCAG policies with a discussion of the consistency, non-consistency or non-applicability of the policy and supportive analysis in a table format (example attached).

The attached policies are meant to provide guidance for considering the proposed project within the context of our regional goals and policies. We also encourage the use of the SCAG List of Mitigation Measures extracted from the RTP to aid with demonstrating consistency with regional plans and policies. **Please provide a minimum of 45 days for SCAG to review the EIR and associated plans when these documents are available.** If you have any questions regarding the attached comments, please contact Bernard Lee at (213) 236-1895 or leeb@scag.ca.gov. Thank you.

Sincerely,

Jacob Lieb, Manager
Assessment, Housing & EIR

DOCS# 154655

COMMENTS ON THE NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT FOR THE MANGROVE ESTATES SITE MIXED USE PROJECT [I20090645]

PROJECT LOCATION

The project site is located at the northeast corner of Alameda Street and First Street on the edge of the Little Tokyo community, in the City of Los Angeles, County of Los Angeles.

PROJECT DESCRIPTION

The proposed project involves a General Plan amendment and other necessary approvals to allow for the development of mixed retail, office, community space, creative live/work units and residential development adjacent to the new Little Tokyo/Arts District Gold Line light rail transit station. Although no specific development is proposed at this time, it is anticipated that the project site could accommodate a maximum of 1.2 million square feet (sf) of floor space. The maximum amount of each specific use that could be accommodated at the site is as follows:

- Retail: 200,000 sf
- Office: 500,000 sf
- Community Space: 25,000 sf
- Creative Live/Work: 75,000 sf (83 units)
- Residential: 400,000 sf (445 units)

The average size of the proposed residential units and creative live/work units is estimated at 900 sf. It is anticipated that approximately 75% of the floor space of each creative live/work unit would be devoted to living area and 25% would be commercial space. Parking would be provided onsite, primarily in subterranean levels. However, it is expected that some parking, including loading/unloading spaces, would be provided at-grade. The maximum height of onsite development is anticipated to be 16 stories above-grade.

Although the maximum amount of onsite development would be 1.2 million sf, the size of each project component could vary from what is shown above. As such, an "equivalency table" will be developed as part of the environmental review to determine what changes in the mix of onsite uses would result in impacts equivalent to or lower than those studied as part of the environmental review.

As part of the proposed project, Hewitt Street would be extended north through First Street, up to East Temple Street. The alignment of the proposed Hewitt Street extension forms the eastern boundary of the project site. In addition, the portions of Banning Street and Turner Street that run through the project site that are currently closed to traffic would be vacated.

In order to accommodate the proposed project, an existing 19,500 sf office building and surface parking lot onsite would be demolished. In addition, future onsite construction would include excavation, grading and other site preparation activities.

CONSISTENCY WITH REGIONAL TRANSPORTATION PLAN

Regional Growth Forecasts

The EIR should reflect the most current SCAG forecasts, which are the 2008 RTP (May 2008) Population, Household and Employment forecasts. The forecasts for your region, subregion, and city are as follows:

Adopted SCAG Regionwide Forecasts[1]

	2010	2015	2020	2025	2030	2035
Population	19,418,344	20,465,830	21,468,948	22,395,121	23,255,377	24,057,286
Households	6,086,986	6,474,074	6,840,328	7,156,645	7,449,484	7,710,722
Employment	8,349,453	8,811,406	9,183,029	9,546,773	9,913,376	10,287,125

Adopted City of Los Angeles Subregion Forecasts[1]

	2010	2015	2020	2025	2030	2035
Population	4,140,516	4,214,082	4,292,139	4,367,538	4,440,017	4,509,435
Households	1,386,658	1,445,177	1,506,564	1,554,478	1,600,754	1,638,823
Employment	1,860,672	1,905,337	1,933,860	1,967,393	2,003,196	2,037,472

Adopted City of Los Angeles Forecasts[1]

	2010	2015	2020	2025	2030	2035
Population	4,057,484	4,128,125	4,204,329	4,277,732	4,348,282	4,415,773
Households	1,366,985	1,424,701	1,485,519	1,532,998	1,578,850	1,616,578
Employment	1,820,092	1,864,061	1,892,139	1,925,148	1,960,393	1,994,134

1. The 2008 RTP growth forecast at the regional, subregional, and city level was adopted by the Regional Council in May 2008. City totals are the sum of small area data and should be used for advisory purposes only.

The **2008 Regional Transportation Plan (RTP)** also has goals and policies that are pertinent to this proposed project. This RTP links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations. The RTP continues to support all applicable federal and state laws in implementing the proposed project. Among the relevant goals and policies of the RTP are the following:

Regional Transportation Plan Goals:

RTP G1 *Maximize mobility and accessibility for all people and goods in the region.*
RTP G2 *Ensure travel safety and reliability for all people and goods in the region.*
RTP G3 *Preserve and ensure a sustainable regional transportation system.*
RTP G4 *Maximize the productivity of our transportation system.*
RTP G5 *Protect the environment, improve air quality and promote energy efficiency.*
RTP G6 *Encourage land use and growth patterns that complement our transportation investments.*
RTP G7 *Maximize the security of our transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.*

GROWTH VISIONING

The fundamental goal of the **Compass Growth Visioning** effort is to make the SCAG region a better place to live, work and play for all residents regardless of race, ethnicity or income class. Thus, decisions regarding growth, transportation, land use, and economic development should be made to promote and sustain for future generations the region's mobility, livability and prosperity. The following "Regional Growth Principles" are proposed to provide a framework for local and regional decision making that improves the quality of life for all SCAG residents. Each principle is followed by a specific set of strategies intended to achieve this goal.

Principle 1: Improve mobility for all residents.

GV P1.1 *Encourage transportation investments and land use decisions that are mutually supportive.*
GV P1.2 *Locate new housing near existing jobs and new jobs near existing housing.*
GV P1.3 *Encourage transit-oriented development.*
GV P1.4 *Promote a variety of travel choices*

Principle 2: Foster livability in all communities.

GV P2.1 *Promote infill development and redevelopment to revitalize existing communities.*
GV P2.2 *Promote developments, which provide a mix of uses.*
GV P2.3 *Promote "people scaled," walkable communities.*
GV P2.4 *Support the preservation of stable, single-family neighborhoods.*

Principle 3: Enable prosperity for all people.

GV P3.1 *Provide, in each community, a variety of housing types to meet the housing needs of all income levels.*
GV P3.2 *Support educational opportunities that promote balanced growth.*
GV P3.3 *Ensure environmental justice regardless of race, ethnicity or income class.*
GV P3.4 *Support local and state fiscal policies that encourage balanced growth*
GV P3.5 *Encourage civic engagement.*

Principle 4: Promote sustainability for future generations.

GV P4.1 *Preserve rural, agricultural, recreational, and environmentally sensitive areas*
GV P4.2 *Focus development in urban centers and existing cities.*
GV P4.3 *Develop strategies to accommodate growth that uses resources efficiently, eliminate pollution and significantly reduce waste.*
GV P4.4 *Utilize "green" development techniques*

CONCLUSION

As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

All feasible measures needed to mitigate any potentially negative regional impacts associated with the proposed project should be implemented and monitored, as required by CEQA. We recommend that you review the SCAG List of Mitigation Measures for additional guidance, and encourage you to follow them, where applicable to your project. The SCAG List of Mitigation Measures may be found here: http://www.scag.ca.gov/igr/documents/SCAG_IGRMMRP_2008.pdf

SUGGESTED SIDE BY SIDE FORMAT - COMPARISON TABLE OF SCAG POLICIES

For ease of review, we would encourage the use of a side-by-side comparison of all SCAG policies with a discussion of the consistency, non-consistency or not applicable of the policy and supportive analysis in a table format. All policies and goals must be evaluated as to impacts. Suggested format is as follows:

The complete table can be found at: http://www.scag.ca.gov/igr/

- Click on ***"Demonstrating Your Project's Consistency With SCAG Policies"***
- Scroll down to ***"Table of SCAG Policies for IGR"***

SCAG Regional Transportation Plan Goals and Compass Growth Visioning Principles		
Regional Transportation Plan Goals		
Goal/ Principle Number	**Policy Text**	**Statement of Consistency, Non-Consistency, or Not Applicable**
RTP G1	Maximize mobility and accessibility for all people and goods in the region.	***Consistent:*** *Statement as to why* ***Not-Consistent:*** *Statement as to why* *or* ***Not Applicable:*** *Statement as to why*
RTP G2	Ensure travel safety and reliability for all people and goods in the region.	***Consistent:*** *Statement as to why* ***Not-Consistent:*** *Statement as to why* *or* ***Not Applicable:*** *Statement as to why*
RTP G3	Preserve and ensure a sustainable regional transportation system.	***Consistent:*** *Statement as to why* ***Not-Consistent:*** *Statement as to why* *or* ***Not Applicable:*** *Statement as to why*
Etc.	Etc.	Etc.

TABLE OF CONTENTS

Page

Figures

INITIAL STUDY

1. Project title: Mangrove Estates Site Mixed Use Development

2. Lead agency name and address: City of Los Angeles
Department of City Planning
200 North Spring Street, Room 667
Los Angeles, CA 90012

3. Contact Person and Phone Number: Patricia Diefenderfer, (213) 978-1179

4. Project location: The site is located at the northeast corner of Alameda Street and First Street on the edge of the Little Tokyo community, in the City of Los Angeles, County of Los Angeles. Figure 1 shows the regional location of the project site and Figure 2 shows the location of the project site within the site vicinity.

5. Project sponsor's name and address: City of Los Angeles
Department of City Planning
200 North Spring Street, Room 667
Los Angeles, CA 90012

6. General Plan designation: Heavy Manufacturing and Regional Commercial

7. Zoning: Heavy Industrial Zone (M3) and Commercial Zone (C2)

8. Description of project:

The proposed project involves a General Plan amendment and other necessary approvals to allow for the development of mixed retail, office, community space, creative live/work units and residential development adjacent to the new Little Tokyo/Arts District Gold Line light rail transit station. Although no specific development is proposed at this time, it is anticipated that the project site could accommodate a maximum of 1.2 million square (sf) feet of floor space. The maximum estimated amount of each of specific use that could be accommodated at the site is as follows:

- *Retail: 200,000 sf*
- *Office: 500,000 sf*
- *Community Space: 25,000 sf*
- *Creative Live/Work: 75,000 sf (83 units)*
- *Residential: 400,000 sf (445 units)*

The average size of the proposed residential units and creative live/work units is estimated at 900 sf. It is anticipated that approximately 75% of the floor space of each creative live/work unit would be devoted to living area and 25% would be commercial space. Parking would be provided onsite, primarily in subterranean levels. However, it is expected that some parking, including loading/unloading spaces, would be provided at-grade. The maximum height of onsite development is anticipated to be 16 stories above-grade.

Although the maximum amount of onsite development would be 1.2 million sf, the size of each project component could vary from what is shown above. As such, an "equivalency table" will be developed as part of the environmental review to determine what changes in the mix of onsite uses would result in impacts equivalent to or lower than those studied as part of this environmental review.

As part of the proposed project, Hewitt Street would be extended north through First Street, up to East Temple Street. The alignment of the proposed Hewitt Street extension forms the eastern boundary of the project site. In addition, the portions of Banning Street and Turner Street that run through the project site that are currently closed to traffic would be vacated.

In order to accommodate the proposed project, an existing 19,500 sf office building and surface parking lot onsite would be demolished. In addition, future onsite construction would include excavation, grading and other site preparation activities.

9. Surrounding land uses and setting:

The project site is located in a highly urbanized setting at the northeast corner of Alameda Street and First Street at the edge of the Little Tokyo community in downtown Los Angeles. Surrounding land uses include a Department of Water and Power facility located across East Temple Street to the north of the site; a Veterans' Affairs Hospital located to the northwest of the site on the northwest corner of Alameda Street and East Temple Street; the Little Tokyo Gold Line light rail transit station immediately adjacent to the west of the site; the Geffen Contemporary at the Museum of Contemporary Art (MOCA) and the Japanese American National Museum located across Alameda Street to the west of the project site; a restaurant and surface parking lot to the southwest of the site on the southwest corner of First Street and Alameda Street; multi-family residential buildings, a car wash and the Sogo/Chugokaya Hotel located across First Street to the south of the site; and a fire station and the Nishi Hongwanji Buddhist Temple located immediately east of the site.

Existing development on the project site includes a public parking lot and an approximately 19,500 sf office building. Vehicular access to the site is currently available via a driveway off of Temple Street.

10. Other public agencies whose approval is required:

The City of Los Angeles has sole discretion to approve the Mangrove Estates Site Mixed Use Project. Project approval may entail the approval of:

- *General Plan Amendment*

- *Zone and Height District change*
- *Tract Map/Subdivision*
- *Street Vacations (Turner Street and Banning Street; both of which are currently closed to traffic)*
- *Site Plan Review*
- *Variances for Parking Reductions*
- *Other related entitlements as necessary*

ENVIRONMENTAL FACTORS AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is "Potentially Significant" or "Potentially Significant Unless Mitigation Incorporated" as indicated by the checklist on the following pages.

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

DETERMINATION:

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☒ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

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

Patricia Diefenderfer — 11/21/2009

Patricia Diefenderfer, City Planner
City of Los Angeles

Date

ENVIRONMENTAL CHECKLIST

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
I. AESTHETICS – Would the project:				
a) Have a substantial adverse effect on a scenic vista?	☒	☐	☐	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☒	☐	☐	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☒	☐	☐	☐

a, c-d. Onsite development would include up to 1.2 million square feet (sf) of mixed use development, including approximately 200,000 sf of retail, 25,000 sf of community space, 83 creative live/work units and 445 residential units. Onsite development would be up to 16 stories. In order to accommodate onsite development, the existing onsite 19,500 sf office building and public parking lot would be demolished. The proposed mix of uses would be generally compatible with the surrounding retail, commercial, residential, light industrial, community, transportation and institutional uses. However, it would intensify the use of the site and have the potential to change the visual character of the area. In addition, the increase in development intensity could potentially create new sources of glare along with nighttime lighting. **As such, impacts to aesthetics would be potentially significant and these issues will be studied further in an EIR.**

b. No state or locally designated Scenic Highways are adjacent to or within view of the project site. The site is not visible from any state or locally designated Scenic Highway. **Therefore, no impact with respect to this issue would occur and further analysis in an EIR is not warranted.**

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
II. AGRICULTURAL RESOURCES -- Would the project:				
a) Convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	☐	☐	☐	☒

a-c. The project site is within a highly urbanized portion of the City of Los Angeles. The site is currently occupied by a surface parking lot and a 19,500 sf office building. As such, the project site is not used for agricultural purposes. The project site has not been identified as being of prime, state or local importance or having unique agricultural resources (City of Los Angeles General Plan Conservation Element). The site is not enrolled in the Williamson Act and is not adjacent to enrolled land. Implementation of the proposed project would not adversely affect existing or planned agricultural lands. **Therefore, no impact to agricultural resources would occur and further analysis in an EIR is not warranted.**

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
III. AIR QUALITY -- Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☒	☐	☐	☐
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☒	☐	☐	☐
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☒	☐	☐	☐

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
III. AIR QUALITY -- Would the project:				
d) Expose sensitive receptors to substantial pollutant concentrations?	☒	☐	☐	☐
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☐	☒

a-d. The project site is located within the South Coast Air Basin (Basin). Onsite development would incrementally increase the population of downtown Los Angeles, with a corresponding increase in air pollutant emissions. Increased emissions would occur on temporary basis due to onsite demolition and construction activity and in the long-term due to increased motor vehicular activity and energy use. The increase air pollutant emissions could expose new residents, employees, and visitors to unhealthful air quality and/or odors. Emissions and localized air pollutant concentrations could also potentially exceed locally adopted thresholds of significance. **Therefore, air quality impacts would be potentially significant and these issues will be studied further in an EIR.**

e. Onsite development would involve up to 1.2 million sf of mixed uses, including retail, office, and community space, live/work units, and residential units. The proposed project would not generate objectionable odors that would affect a substantial number of people. None of the proposed uses are included on Figure 5-5 *Land Uses Associated with Odor Complaints* of the 1993 SCAQMD CEQA Air Quality Handbook. Therefore, it is unlikely that the proposed project would generate objectionable odors affecting a substantial number of people. **No impact would occur and no further analysis is required.**

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES -- Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES -- Would the project:				
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

a-f. The project site is located within a highly urbanized area of downtown Los Angeles and is nearly entirely covered with impervious surfaces, including a 19,500 square foot office building and a public parking lot (see Figure 3). The project site lacks native biological habitats, including wetlands. Therefore, site development would not adversely affect sensitive plant or animal species, nor would it interfere with wildlife movement or the provisions of any adopted habitat conservation plan. **No impact to biological resources would occur and further analysis of this issue in an EIR is not warranted.**

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
V. CULTURAL RESOURCES -- Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☒	☐	☐	☐

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
V. CULTURAL RESOURCES -- Would the project:				
b) Cause a substantial adverse change in the significance of an archaeological resource as defined in §15064.5?	☐	☒	☐	☐
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☐	☒

a. Onsite development, including the demolition of the existing structure onsite, would not affect any known historic resources. Nevertheless, an historic resource analysis will be conducted to confirm the presence or absence of historic resources. **Impacts would be potentially significant and this issue will be studied further in an EIR.**

b. An archaeological resource is defined in Section 15064.5(c) of the *CEQA Guidelines* as a site, area or place determined to be historically significant as defined in Section 15064.5 (a) of the CEQA Guidelines (see definition of historical resource above in section (a)), or as a unique archaeological resource defined in Section 21083.2 of the Public Resources Code as an artifact, object, or site that contains information needed to answer important scientific research questions of public interest, or that has a special and particular quality such as being the oldest or best example of its type, or that is directly associated with a scientifically recognized important prehistoric or historic event or person.

Onsite development would include excavation for subterranean parking and building footings. The project site has been previously disturbed by the construction of the existing 19,500 sf building, which included grading and excavation activities. As such, it is expected that if any unknown archeological resources had existed in the underlying soils of the project site, they would have been destroyed by previous onsite construction activities. Therefore, the potential for unknown archeological resources to occur onsite is low. **Nonetheless, impacts to unknown archeological resources occurring onsite would be potentially significant unless mitigated and this issue will be further discussed in an EIR.**

c. The project site is within a highly urbanized area that has been disturbed to accommodate past and present onsite development. There is no evidence that paleontological resources are present onsite. As such, it is expected that if any unknown paleontological resources had existed in the underlying soils of the project site, they would have been destroyed by previous onsite construction activities. Therefore, the potential for unknown paleontological resources to occur onsite is low. **Nonetheless, impacts to unknown paleontological resources occurring onsite would be potentially significant unless mitigated and this issue will be further discussed in an EIR.**

d. As discussed above, the project site is within a highly urbanized area that has been disturbed to accommodate past and present onsite development. There is no evidence that human remains are present onsite. As such, it is expected that if any unknown human remains had existed in the underlying soils of the project site, they would have been destroyed by previous onsite construction activities. If human remains are found during excavation and/or grading activities, all work would be required to cease in that area (anticipated radius is 25 feet of the discovery). Any discovery of human remains would be required to be treated in accordance with Section 5097.98 of the Public Resources Code (PRC) and Section 7050.5 of the Health and Safety Code. **Implementation of these mandatory regulatory requirements would ensure that potential impacts associated with the disturbance of human remains would result in no impact. Further discussion of this issue in an EIR is not warranted.**

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
VI. GEOLOGY AND SOILS – Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☒	☐	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☒	☐	☐
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☒	☐	☐
d) Be located on expansive soil, as defined in Table 1-B of the Uniform Building Code, creating substantial risks to life or property?	☐	☒	☐	☐

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
VI. GEOLOGY AND SOILS – Would the project:				
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 wastewater?	☐	☐	☐	☒

a(i). The project site is not located in an Alquist Priolo Zone as delineated by the State of California Special Studies Zones (Los Angeles Quadrangle), effective January 1, 1977. **No impact would occur and further analysis in an EIR is not warranted.**

a(ii, iii). Southern California is located in an active seismic region. As such, development that occurs within the geographical boundaries of southern California has the potential of exposing people and/or structures to potentially substantial adverse effects involving the rupture of a known earthquake fault, strong seismic ground shaking and seismic-related ground failure (including liquefaction). **Impacts are considered potentially significant unless mitigated and will be further examined and discussed in the EIR.**

a(iv). The project site is not located in a landslide zone as delineated by the State of California Seismic Hazards Zones Map (Los Angeles Quadrangle Official Map, effective March 25, 1999). **No impact would occur and further analysis in an EIR is not warranted.**

b. Temporary erosion could occur during project construction. During the construction phase of the project, activities are subject to requirements of the County National Pollutant Discharge Elimination System (NPDES) Construction Permit. Compliance with the NPDES permit includes the implementation of Best Management Practices (BMPs), some of which are specifically implemented to reduce soil erosion or loss of topsoil. As the project would include grading and excavation of the site, the use of BMPs such as mulching and geotextiles and mats would be used on the project site to ensure that soil erosion is reduced to the maximum extent possible. In addition to the NPDES permit, a Local Storm Water Pollution Prevention Plan (SWPPP) and a Wet Weather Erosion Control Plan (WWECP) would also be developed for the project. Further, conformance with the LABC, including implementation of an erosion control plan, would reduce the potential for wind or waterborne erosion during the construction process. **Therefore, project impacts related to soil erosion during the construction phase would be less than significant and further analysis in an EIR is not warranted.**

Once operational, the project would include landscaping within areas not occupied by structures or pavement. The use of vegetation and groundcover would act as an effective barrier to soil erosion by impeding direct contact between precipitation/irrigation and the on-site soils. Additionally, a Standard Urban Storm Water Management Plan (SUSMP) would be developed to reduce the potential for pollutants, including soils, to runoff from the site. The SUSMP is a working plan that is systematically reviewed and revised to ensure that BMPs are functioning

properly and are effective at treating runoff from the site for the life of the project. **Therefore, operational impacts related to erosion would be less than significant and further analysis of this issue is an EIR is not warranted.**

c. As discussed above under items a(ii, iii), the project site may be subject to potential geologic hazards including rupture of a known earthquake fault, strong seismic ground shaking and seismic-related ground failure (including liquefaction). **Impacts are considered potentially significant unless mitigated and will be further examined and discussed in the EIR.**

d. Expansive soils are primarily composed of clays, which increase in volume when water is absorbed and shrink when dry. Expansive soils are of concern since building foundations may rise during the rainy season and fall during dry periods in response to the clay's action. If movement varies under different parts of the building, structural portions of the building may distort. **Impacts relating to expansive soils are potentially significant unless mitigated and will be further studied in an EIR.**

e. The proposed project would be connected to the local wastewater treatment system. Septic systems would not be used. **No impact would occur and further analysis of this issue in an EIR is not warranted.**

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
VII. HAZARDS AND HAZARDOUS MATERIALS - Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within ¼ mile of an existing or proposed school?	☐	☒	☐	☐
d) Be located on a site which is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☒	☐	☐

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
VII. HAZARDS AND HAZARDOUS MATERIALS - Would the project:				
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
h) Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐	☒

a. Onsite development would involve up to 1.2 million sf of mixed uses, including retail, office, and community space, live/work units, and residential units. In order to accommodate the proposed project, the existing onsite 19,500 sf office building and public parking lot would be demolished. The types of development to be built onsite would not involve the transport, use, or disposal of substantial quantities of hazardous materials or introduce any unusual hazardous materials to the area. **Therefore, impacts related to this issue would be less than significant and further analysis of this issue in an EIR is not warranted.**

b, d. The project site is currently occupied by a surface parking lot and a 19,500 square foot office building. As such, the site is completely covered. Although no known soil or groundwater contamination is present, former industrial uses of the site could have resulted in release of contaminants. **Therefore, impacts related to the past release of hazardous materials into the environment would be potentially significant unless mitigated and this issue will be further analyzed in an EIR.** The EIR analysis will involve the preparation of a Phase I environmental site assessment (ESA). This will include a reconnaissance of the project area to identify recognized environmental hazards, an environmental database search for the project area, review of files at various agencies as deemed necessary based on the environmental databases search and review of available environmental reports for the project area.

c. The Asahi Gakuen Elementary and Middle School is located approximately 1,000 feet to the southwest of the project site at 244 South San Pedro Street. As discussed above, the types of

uses proposed for the site would not involve the use or transport of hazardous materials. Therefore, nearby schools would not be adversely affected.

Onsite construction activity would involve demolition of the existing onsite structure, which could potentially contain asbestos and lead-based paints and materials. The removal of any asbestos-containing materials would be required to comply with all applicable existing rules and regulations, including SCAQMD Rule 1403 (Asbestos Demolition and Renovation Activities). In addition, the proposed project would have to comply with California Occupational Safety and Health Administration (CalOSHA) regulations regarding lead-based materials. The California Code of Regulations, §1532.1, require testing, monitoring, containment, and disposal of lead-based materials such that exposure levels do not exceed CalOSHA standards. **Nonetheless, because the project would involve demolition of the existing onsite structure, which could potentially contain asbestos and lead-based paints and materials, impacts would be potentially significant unless mitigated. This issue will be further analyzed in an EIR.**

e, f. The project site is not located in the vicinity of any public or private airstrips. **No impact would occur and further analysis in an EIR is not warranted.**

g. The proposed project involves potential mixed use infill development in an urbanized area of Los Angeles. **Project implementation would not interfere with emergency response or evacuation. No impact would occur and further analysis of this issue in an EIR is not warranted.**

h. The project site is in an urbanized area that is not subject to wildland fire hazards. **No impact would occur and further analysis of this issue in an EIR is not warranted.**

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
VIII. HYDROLOGY AND WATER QUALITY – Would the project:				
a) Violate any water quality standards or waste discharge requirements?	☐	☒	☐	☐
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering or the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☒	☐	☐	☐

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
VIII. HYDROLOGY AND WATER QUALITY – Would the project:				
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☒	☐	☐
d) Substantially alter the existing drainage pattern of the site or area, including the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☒	☐	☐
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☒	☐	☐
f) Otherwise substantially degrade water quality?	☐	☒	☐	☐
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☒	☐
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☒	☐
i) Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?	☒	☐	☐	☐
j) Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒

a, c-f. Onsite development would involve up to 1.2 million sf of mixed uses, including retail, office, and community space, live/work units, and residential units. The project site is almost entirely paved, including impervious surfaces such as an existing 19,500 square foot office building and a public parking lot. Nevertheless, the proposed project could alter surface runoff patterns. This has the potential for both increased runoff and runoff containing contaminants such as oil or grease. The potential increase in runoff has the potential to exceed the capacity of the planned drainage system and require the development of new or expanded facilities.

Therefore, impacts related to these hydrology and water quality issues would be potentially significant unless mitigated and this issue will be studied further in an EIR.

b. The City of Los Angeles Department of Water and Power (LADWP) is responsible for ensuring that water demand in the City is met and that State and federal water quality standards are achieved. Water sources for the project site include the Los Angeles Aqueduct, groundwater, purchases from the Metropolitan Water District (MWD) and recycled water. Onsite development would require increased water supplies as compared to existing uses. **Therefore, impacts related to groundwater would be potentially significant and this issue will be studied further in an EIR.**

g-h. The project site is located in Zone X, which is an area with a 0.2% annual chance of flood and is not within the 100-year flood zone (FEMA Flood Map, Panel No. 06037C1636F, 2008). **Impacts related to flood hazards would be less than significant and further analysis of this issue in an EIR is not warranted.**

i. According to the Inundation and Tsunami Hazard Areas map prepared by the City of Los Angeles Planning Department (1994), the project site is located in a potential dam inundation area, which is described as an area that could be flooded if a Flood Control Dam failed and released the water held in its detention basin upon the population and land uses downstream from it (City of Los Angeles, 1994). **Therefore, impacts are potentially significant and this issue will be studied further in an EIR.**

j. A tsunami is a tidal wave produced by off-shore seismic activity; seiches are seismically induced waves that occur in large bodies of water. Because the project site is located about 14 miles inland, tsunami risks are not a significant concern. Additionally, the project site is not located in close proximity to a large body of water that is subject to seiches. **Therefore, no impact would occur with respect to this issue and further analysis of this issue is not warranted.**

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
IX. LAND USE AND PLANNING -- Would the proposal:				
a) Physically divide an established community?	☐	☐	☐	☒
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?	☒	☐	☐	☐
c) Conflict with an applicable habitat conservation plan or natural community	☐	☐	☐	☒

conservation plan?

a. Land uses surrounding the project site include a Department of Water and Power facility located across East Temple Street to the north of the site; a Veterans' Affairs Hospital located to the northwest of the site on the northwest corner of Alameda Street and East Temple Street; the Little Tokyo/Arts District Gold Line light rail transit station immediately adjacent to the east of the site; the Geffen Contemporary at the Museum of Contemporary Art (MOCA) and the Japanese American National Museum located across Alameda Street to the west of the project site; a restaurant and surface parking lot to the southwest of the site on the southwest corner of First Street and Alameda Street; multi-family residential buildings, a commercial building and the Sogo/Chugokaya Hotel located across 1st Street to the south of the site; and a fire station and the Nishi Hongwanji Buddhist Temple located immediately east of the site.

Onsite development would involve up to 1.2 million sf of retail, office, and community space, live/work units, and residential units. The project site is within a highly urbanized area. However, onsite development would not involve new roadways or other facilities that would divide an established community. **Therefore, the project would not physically divide an established community and no impact with respect to this issue would occur. Further analysis of this issue in an EIR is not necessary.**

b. Onsite development would require discretionary approvals such as a General Plan amendment, Zone and Height District change, and street vacation. **Impacts associated with land use conflicts would be potentially significant and this issue will be studied further in an EIR.** The analysis of land use impacts will consider the consistency of the proposed project with local and regional land use policies including the City's Zoning Code and the Central City North Community Plan, and the Southern California Association of Governments' (SCAG's) 2008 Regional Comprehensive Plan.

c. The project site is located in a highly urbanized area. The site is not subject to an adopted habitat conservation plan or natural community conservation plan (City of Los Angeles General Plan Conservation Element, 2001). **No impact would occur and further analysis in an EIR is not warranted.**

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
X. MINERAL RESOURCES -- Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☒	☐
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☒	☐

a, b. As stated in the Conservation Element of the City's General Plan, significant potential mineral deposit sites have been identified by the state geologist along the flood plain from the San Fernando Valley through the downtown. The project site lies within this generalized area. However, the developed status of this area, including the project site, makes it inaccessible for mining extraction (City of Los Angeles General Plan Conservation Element). Therefore, the project would not result in the loss of any known mineral resources. **Impacts would be less than significant and further analysis of this issue in an EIR is not warranted.**

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XI. NOISE – Would the project result in:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☒	☐	☐	☐
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☒	☐	☐	☐
c) A substantial permanent increase in ambient noise levels above levels existing without the project?	☒	☐	☐	☐
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☒	☐	☐	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise?	☐	☐	☐	☒

a, b, d. Project site preparation and construction activities would generate temporary increases in noise onsite and at adjacent properties, including groundborne vibrations/noise. Noise levels during construction can be in the 78-88 dBA range during peak activity periods (U.S. Environmental Protection Agency, 1971). Such levels are higher than ambient noise levels in the site vicinity. As such, construction activities could adversely affect sensitive receptors in the project area. **Impacts would be potentially significant and will be studied further in an EIR.**

c. The main source of noise at the project site is traffic on Alameda Street and First Street. The increase in traffic levels within and adjacent to the project site associated with the onsite development would incrementally increase noise levels at sensitive receptor locations on adjacent streets. Onsite activities associated with retail and office development could also increase noise levels at nearby sensitive receivers, including residences. Finally, onsite residential development could be exposed to ambient noise outside the normally acceptable range due to the relatively high ambient noise levels on and around the site. **Impacts would be potentially significant. Noise generated by traffic on surrounding roadways and the light rail, along with noise generated onsite, will be studied further in an EIR.**

e, f. The project site is not in the vicinity of any public or private airport (the closest airport is the Compton Airport, located approximately 11 miles south of the project site). **Therefore, no impact related to aircraft noise would occur and further discussion of this issue in an EIR is not warranted.**

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

a. Onsite development would involve up to 1.2 million sf of retail, office, and community space, live/work units, and residential units. Based on the most recent population estimates, the 2009 residential population of the City of Los Angeles is approximately 4,065,585 people residing in approximately 1,407,967 housing units (California Department of Finance, Population and Housing Estimates, 2009). The Southern California Association of Governments (SCAG) 2008 Integrated Growth Forecast estimates that the residential population of the area will increase to 4,128,125 people by 2015 (an increase of approximately 1.5%). Additionally, the SCAG Integrated Growth Forecast estimates that the number of housing units in the area will increase to 1,424,701 units by 2015 (an increase of approximately 1%). The future development on the project site could add up to 528 residential units to the City, which constitutes approximately 3% of the projected growth for housing units in the City of Los Angeles by 2015. Based on the 2009 residential population and number of housing units in the City, there are approximately 2.89 persons per household. Therefore, the future onsite development would generate

approximately 1,526 new residents. The estimated residential population generated by future onsite development would constitute approximately 2.5% of the projected population growth in the City of Los Angeles by 2015. The proposed number of housing units and subsequent increase in population generated by the proposed project would be within the established forecasts for the City of Los Angeles. Additionally, as stated in governing regional and local planning documents, including the City of Los Angeles General Plan Housing Element, the City is in need of new housing units to serve both the current population and the projected population. While the project would not eliminate the housing shortage in the City, it would promote the goal of generating more housing. Furthermore, the project is located in an area already served by existing infrastructure (i.e., roadways, transit, utility lines, etc.). **Therefore, impacts would be less than significant and further analysis of this issue in an EIR is not warranted.**

b, c. The project site is currently developed with a surface parking lot and a 19,500 sf office building. There are currently no residences onsite. As such, onsite development would not displace any housing or people. **No impact would occur and further analysis of this issue in an EIR is not warranted.**

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XIII. PUBLIC SERVICES				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i) Fire protection?	☒	☐	☐	☐
ii) Police protection?	☒	☐	☐	☐
iii) Schools?	☒	☐	☐	☐
iv) Parks?	☒	☐	☐	☐
v) Other public facilities?	☒	☐	☐	☐

a (i-v). The Los Angeles Police Department (LAPD) and Fire Department (LAFD) provide emergency services to the project site. The Los Angeles Unified School District (LAUSD) provides public school service to the project site. Parks are discussed below under Item XIV, *Recreation*. The proposed project would incrementally increase the demands on fire and police service, parks, and schools. Such demand increases could affect response times and service

ratios, thus potentially creating the need for new facilities. **Therefore, impacts related to the increase in demand for public services would be potentially significant and this issue will be studied further in an EIR.**

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XIV. RECREATION --				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☒	☐	☐	☐
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☒	☐	☐	☐

a, b. The City of Los Angeles Department of Recreation and Parks (LADRP) manages all municipally owned and operated recreation and park facilities within the City. Implementation of the proposed project would increase demand for recreational facilities within the City and potentially create the need for additional recreational facilities to maintain City park standards. **As a result, impacts related to the increase in demand for recreational facilities would be potentially significant and this issue will be studied further in an EIR.**

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XV. TRANSPORTATION / TRAFFIC -- Would the project:				
a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?	☒	☐	☐	☐
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	☒	☐	☐	☐

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XV. TRANSPORTATION / TRAFFIC -- Would the project:				
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?	☐	☐	☐	☒
e) Result in inadequate emergency access?	☐	☐	☐	☒
f) Result in inadequate parking capacity?	☒	☐	☐	☐
g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	☒	☐	☐	☐

a, b, f. Currently, the site is occupied by a 19,500 sf office building and a surface parking lot. The 1.2 million sf of mixed use development that could be constructed onsite would intensify the use of the site compared to the current land use. The project site is served by several modes of alternative transportation, including the Little Tokyo/Arts District Gold Line Light Rail Transit Station (located immediately adjacent to the site at the intersection of First Street and Alameda Street) and bus lines 445, 701, 30/31, 730, 40 and 42, which have designated stops within two blocks of the project site. In addition, the Downtown Regional Connector is planned to be constructed at the intersection of First Street and Alameda Street. It is expected that a certain number of residents, employees and patrons of future onsite development would choose to utilize these alternative modes of transportation instead of driving a car. Nonetheless, traffic generation and parking demand of future onsite development would be higher than what currently exists. **Therefore, impacts to the local circulation system and parking supply would be potentially significant and will be further evaluated in the EIR.** A traffic study will be conducted as part of the EIR to analyze and evaluate the onsite development's potential impacts to traffic, circulation, parking, and access.

c. Onsite development would not affect air traffic patterns. **No impact would occur and further analysis of this issue in an EIR is not warranted.**

d. Onsite development is not anticipated to include any hazardous design features such as sharp curves or dangerous intersections on or offsite, nor does the project propose any hazardous or incompatible uses. Furthermore, there are no existing hazardous design features such as sharp curves or dangerous intersections onsite or within the project site vicinity. Project construction would be confined to the project site and would not increase hazards by

design features or though incompatible uses. **Therefore, no impact would occur and further analysis of this issue is not required.**

e. Access to the project site is currently provided on East Temple Street. Access to the site would be required to meet Fire Department specifications. **No impact would occur and further analysis of this issue in an EIR is not warranted.**

g. The Little Tokyo/Arts District Gold Line Transit Station is located at the intersection of First Street and Alameda Street. In addition, the Downtown Regional Connector is planned to be constructed at the same intersection. The proposed project would not physically conflict with these transit stations. However, the increased number of onsite residents and employees could increase transit ridership. **Therefore, impacts would be potentially significant and will be further studied in an EIR.**

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XVI. <u>UTILITIES AND SERVICE SYSTEMS</u> – Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☒	☐	☐	☐
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☒	☐	☐	☐
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☒	☐	☐	☐
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☒	☐	☐	☐
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☒	☐	☐	☐
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☒	☐	☐	☐

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XVI. UTILITIES AND SERVICE SYSTEMS – Would the project:				
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☒	☐	☐	☐

a, b, e. Wastewater generated onsite would be conveyed via an established sewer system to the Hyperion Treatment Plant (HTP). Onsite development would increase onsite wastewater generation. The wastewater generated by the project could potentially exceed the capacity of existing conveyance and treatment facilities. **Therefore, impacts associated with wastewater generation and treatment would be potentially significant and will be studied further in the EIR.**

c. As described in Section VIII, *Hydrology and Water Quality*, onsite development has the potential to alter drainage patterns from the project site. As a result, existing storm drain facilities could be adversely affected. **Therefore, impacts would be potentially significant and further analysis of this issue will be studied further in the EIR.**

d. Onsite development would involve up to 1.2 million sf of mixed uses, including retail, office, and community space, live/work units, and residential units. This development would increase water demand as compared to the existing onsite uses. For regionally significant individual projects (more than 500 residential units or 500,000 square feet of non-residential development), a water supply assessment is required pursuant to Senate Bill (SB) 610. **Impacts associated with water supply would be potentially significant and will be studied further in the EIR.**

f, g. Onsite development would increase solid waste generation as compared to the existing onsite uses. The amount of solid waste generated could potentially exceed the capacity of waste collection and disposal systems. In addition, onsite solid waste diversion programs may not meet City requirements pursuant to Assembly Bill (AB) 939. **Therefore, impacts related to the generation and disposal of solid waste would be potentially significant and will be studied further in the EIR.**

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XVII. MANDATORY FINDINGS OF SIGNIFICANCE —				
a) Does the project have the potential to substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self- sustaining levels, eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☒	☐	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☒	☐	☐	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☒	☐	☐	☐

a. The project site is located within a highly urbanized area that lacks native biological habitats, as discussed under Item IV, *Biological Resources*. As discussed under Item V, *Cultural Resources*, the site has previously been disturbed and, as a result, it is expected that if any unknown archeological or paleontological resources or human remains had existed in the underlying soils of the project site, they would have been destroyed by previous onsite construction activities. Nonetheless, impacts related to unknown archeological an paleontological resources will be further studied in an EIR. A historic resource evaluation will be prepared for the project to determine whether the existing onsite building is eligible for listing as a historic resource. **Therefore, impacts to cultural resources would be potentially significant and this issue will be studied further in an EIR.**

b. Onsite development would involve up to 1.2 million sf of mixed uses, including retail, office, and community space, live/work units, and residential units. The demolition of the existing public parking lot and 19,500 sf office building would be required in order to accommodate the project. As discussed in this Initial Study, onsite development has the potential to result in significant impacts related to aesthetics, air quality, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, public services, recreation, traffic and utilities and service systems. As such, these issue areas require further study in an EIR to determine the level of significance of impacts, some of which

may have cumulative impacts. Onsite development could also result in increased emissions of greenhouse gases (GHGs), thereby potentially contributing to cumulative impacts related to global climate change. **Therefore, potentially significant cumulative impacts may occur and will be studied further in an EIR.**

c. As discussed in items III, *Air Quality*; VI, *Geology and Soils*; VII, *Hazards and Hazardous Materials*; and XI, *Noise*, potentially significant impacts related to these issue areas may occur, some of which could cause substantial adverse effects on human beings either directly or indirectly. **Therefore, impacts related to these issues would be potentially significant and will be studied further in an EIR.**

References

California Department of Conservation, Seismic Hazard Zones Map: Los Angeles Quadrangle, 1999.

California Department of Conservation, Special Studies Zones Map: Los Angeles Quadrangle, 1977.

California Department of Finance, Population and Housing Estimates, 2009. (http://www.dof.ca.gov/research/demographic/reports/estimates/e-5/2009/)

California Department of Toxic Substances Control, Hazardous Waste and Substances Site List-Site Cleanup (Cortese List), October 2009. (http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm)

Federal Emergency Management Agency (FEMA), Flood Insurance Rate Map, Panel No. 06037C1636F, 2008. (www.msc.fema.gov)

Los Angeles, City of, General Plan, 1996. (http://cityplanning.lacity.org/)

Los Angeles, City of, Municipal Code, 2009. (http://www.amlegal.com/library/ca/losangeles.shtml)

Southern California Association of Governments, Integrated Growth Forecast, 2008. (http://www.scag.ca.gov/forecast/index.htm)

U.S. Environmental Protection Agency, Noise from Construction Equipment and Operations, PB 206 717, 1971.