



2159 Bay Street Project

Case Number: ENV-2017-625-EIR

Project Addresses: 2136–2148 and 2159 E. Bay Street, and 2145–2161 E. Sacramento Street, Los Angeles, CA 90021

Community Plan Area: Central City North

Council District: 14—Jose Huizar

Project Description: The Project includes the development of a three-building creative office campus that would be comprised of an eight-story commercial high-rise building with up to two levels of subterranean parking, and two two-story commercial buildings. The Project would specifically include approximately 202,954 square feet of creative office space, 16,000 square feet of retail and restaurant space, and 3,235 square feet of event and meeting space. The Project would provide a total of 711 vehicle parking spaces within up to two levels of subterranean parking levels and one ground floor parking level. To provide for the Project, all existing buildings and uses on-site would be removed, including the three existing buildings which include 39,328 square feet of office and industrial uses.

The Project would create a pedestrian environment along Bay Street and Sacramento Street, an area that currently lacks pedestrian infrastructure, by constructing new sidewalks, street trees, ground floor commercial space with storefront glazing, and a lobby entrance for the office/creative office tenants along a pedestrian paseo. Vehicular access to the Project would be provided from driveways located on Bay Street and Sacramento Street, and a lay-by for passenger drop-off and pick-up on Bay Street. Levels 2 through 8 of the high-rise building would include outdoor terraces for the building's office tenants, and a pedestrian paseo would be provided on the eastern portion of the Site.

PREPARED FOR:

City of Los Angeles
Department of City Planning

PREPARED BY:

Eystone Environmental

APPLICANT:

Sacramento Street Property LP

August 2018

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INITIAL STUDY

Executive Summary

Date: August 24, 2018

Project Title: 2159 Bay Street Project

Environmental Case Number: ENV-2017-625-EIR

Related Cases: N/A

Project Location: The Project Site consists of five parcels (APNs 5166-005-010, -013, -009, -008 and 5166-001-002) comprising 1.7 acres at the eastern termini of E. Bay Street and E. Sacramento Street (east of S. Santa Fe Avenue) in the Arts District area of the City of Los Angeles. The following addresses are associated with the Project Site: 2136–2148 and 2159 E. Bay Street, and 2145–2161 E. Sacramento Street, Los Angeles, CA 90021.

Community Plan Area: Central City North

Council District: 14—Jose Huizar

Lead City Agency: City of Los Angeles Department of City Planning

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Applicant Name and Address: Sacramento Street Property LP, 400 S. Hope Street, Ste. 200, Los Angeles, CA 90017

Phone Number: (213) 443-5048

General Plan Designation: Heavy Industrial

Zoning: M3-1-RIO

PROJECT DESCRIPTION: The Project includes the development of a three-building creative office campus that would be comprised of an eight-story commercial high-rise building with up to two levels of subterranean parking, and two two-story commercial buildings. The Project would specifically include approximately 202,954 square feet of creative office space, 16,000 square feet of retail and restaurant space, and 3,235 square feet of event and meeting space. The Project would provide a total of 711 vehicle parking spaces within up to two levels of subterranean parking levels and one ground floor parking level. To provide for the Project, all existing buildings and uses on-site would be removed, including the three existing buildings which include 39,328 square feet of office and industrial uses.

The Project would create a pedestrian environment along Bay Street and Sacramento Street, an area that currently lacks pedestrian infrastructure, by constructing new sidewalks, street trees, ground floor

commercial space with storefront glazing, and a lobby entrance for the office/creative office tenants along a pedestrian paseo. Vehicular access to the Project would be provided from driveways located on Bay Street and Sacramento Street, and a lay-by for passenger drop-off and pick-up on Bay Street. Levels 2 through 8 of the high-rise building would include outdoor terraces for the building's office tenants, and a pedestrian paseo would be provided on the eastern portion of the Site.

(For additional detail, see “Part A—Project Description.”)

ENVIRONMENTAL SETTING:

The Project Site is currently developed with three buildings that comprise 39,328 square feet of floor area and are utilized by Hyperloop One for office and light industrial purposes, including engineering and test development operations, office operations, and fabrication and machining operations. The Project Site is located at 2136–2148 and 2159 E. Bay Street, and 2145–2161 E. Sacramento Street, and is generally bounded by Bay Street to the north with textile and import businesses to the north of Bay Street, industrial-zoned (M3-1-RIO) property to the west developed with a surface parking lot and one-story commercial/industrial buildings, Sacramento Street to the south with warehouse uses to the south of Sacramento Street, and industrial-zoned (M3-1-RIO) properties to the east used for surface parking and the BNSF railroad. Primary regional access to the Project Site is provided by the Hollywood Freeway (US-101) to the east and north, the Santa Monica Freeway (I-10) to the south and east, and the Golden State Freeway (I-5) to the east, which are all accessible within less than 1 mile of the Project Site. Major arterials providing regional access to the Project Site include South Santa Fe Avenue, East 7th Street, East Olympic Boulevard, and South Alameda Street.

(For additional detail, see “Part A—Project Description.”)

Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?

No.

Other public agencies whose approval is required (e.g. permits, financing approval, or participation agreement.):

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

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

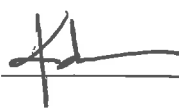
DETERMINATION (to be completed by Lead Agency)

On the basis of this initial evaluation:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☒ I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Kathleen King
PRINTED NAME

Planning Associate
TITLE



SIGNATURE

(213) 847-3746
TELEPHONE NUMBER

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of a mitigation measure has reduced an effect from “Potentially Significant Impact” to “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analysis,” as described in (5) below, may be cross referenced).
- 5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are “Less Than Significant With Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated
- 7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whichever format is selected.
- 9) The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significance.

A. Project Description

ATTACHMENT A

Project Description

A. Project Summary

The Project includes the development of a three-building creative office campus that would be comprised of an eight-story commercial high-rise building with up to two levels of subterranean parking, and two two-story commercial buildings. The Project would specifically include approximately 202,954 square feet of creative office space, 16,000 square feet of retail and restaurant space, and 3,235 square feet of event and meeting space. The Project would provide a total of 711 vehicle parking spaces within up to two levels of subterranean parking levels and one ground floor parking level. To provide for the Project, all existing buildings and uses on-site would be removed, including the three existing buildings which include 39,328 square feet of office and industrial uses.

The Project would create a pedestrian environment along Bay Street and Sacramento Street, an area that currently lacks pedestrian infrastructure, by constructing new sidewalks, street trees, ground floor commercial space with storefront glazing, and a lobby entrance for the office/creative office tenants along a pedestrian paseo. Vehicular access to the Project would be provided from driveways located on Bay Street and Sacramento Street, and a lay-by for passenger drop-off and pick-up on Bay Street. Levels 2 through 8 of the high-rise building would include outdoor terraces for the building's office tenants, and a pedestrian paseo would be provided on the eastern portion of the Site.

B. Environmental Setting

1. Project Location

As shown in Figure A-1 on page A-2, the Project Site is located in the Arts District area of the City of Los Angeles (City), approximately 14 miles east of the Pacific Ocean. The Project Site is also located within the boundaries of the Central City North Community Plan Area within the City of Los Angeles. Primary regional access to the Project Site is provided by the Santa Ana Freeway (US-101) to the east and north, the Santa Monica Freeway (I-10) to the south and east, and the Golden State Freeway (I-5) to the east, which are all accessible within less than 1 mile of the Project Site. Major arterials providing regional access to the Project Site include South Santa Fe Avenue, East 7th Street, East Olympic Boulevard, and South Alameda Street.

The Project Site's property addresses are 2136–2148 and 2159 E. Bay Street, and 2145–2161 E. Sacramento Street. The Project Site encompasses five parcels totaling approximately

74,063 square feet of lot area (1.70 acres), and includes Assessor's Parcel Numbers 5166-001-002 and 5166-005-008, -009, -010, and 013.

2. Existing Uses

a. Existing Project Site Conditions

As shown in Table A-1 on page A-4, the Project Site is currently developed with three buildings that are comprised of the following: 7,106 square feet of office uses in Building A; 6,584 square feet of light industrial uses in Building B; and 25,638 square feet of light industrial and creative office uses in Building C. In total, the three buildings comprise 39,328 square feet of floor area. Hyperloop One currently occupies all tenant spaces at the site. Existing uses include engineering and test development operations, office operations, and fabrication and machining operations. Exterior areas in the central and eastern portions of the Project Site are used for storage, equipment staging, and exterior operations. Other smaller structures at the Project Site include shipping containers that have been converted into offices and conference rooms, tents used for welding operations and meetings, and stacked parking systems. In addition, designated areas for storage of industrial byproducts and materials associated with on-site uses are located on the south side of Building C. The Project Site is relatively flat with limited ornamental landscaping.

b. Land Use and Zoning

As indicated above, the Project Site is located within the planning boundary of the Central City North Community Plan area. The Project Site has a General Plan land use designation of Heavy Industrial and is zoned M3-1-RIO. The M3 designation indicates that the Project is located in a Heavy Industrial zone, which permits a wide variety of industrial, manufacturing, and storage uses, as well as office and commercial uses. The "1" indicates that the Project Site is located in Height District 1, which does not specify a building height limit, but limits the FAR to 1.5 to 1. The RIO designation is for the City's River Improvement Overlay (RIO) district, which is designed to provide for preservation of tributaries and rivers in the City of Los Angeles by promoting river identity, supporting local species, and convenient access, among many other aspects.

The Project Site is also located within the Central Industrial Redevelopment Project area and a Transit Priority Area (TPA) pursuant to Senate Bill (SB) 743. The Central Industrial Redevelopment Project (Central Industrial Plan) was adopted by the City Council on November 15, 2002 pursuant to Ordinance No. 174978. The project adopted under the Central Industrial Plan includes a number of properties (CBD Parcels) which were previously part of the Central Business District Redevelopment Project (CBD Project). The CBD Project is generally bounded by 4th Street on the north, Washington Boulevard and the I-10 Freeway on the south, the Los Angeles River on the east, and Stanford Avenue and San Pedro Street on the west. The purpose of the CBD Project is to eliminate various conditions of blight that have been identified within the proposed project area and to redevelop the area through new industrial, commercial, and residential development and rehabilitation/reuse of existing development, to maintain and expand industrial, manufacturing uses, commercial business and residential neighborhoods, and to preserve /reuse cultural resources. As part of the building permit process, the CRA successor agency will review the Project for consistency with the Central Industrial Plan.

**Table A-1
Summary of Existing Uses**

Land Use	Floor Area (sf)
Office (Bldg. A)	7,106 sf
Light Industrial (Bldg. B)	6,584 sf
Creative Office (Bldg. C)	16,000 sf
Light Industrial (Bldg. C)	9,638 sf
Total	39,328 sf
<i>sf = square feet</i> <i>Source: Eyestone Environmental, 2018.</i>	

3. Surrounding Land Uses

The Project Site is generally bounded by Bay Street to the north with textile and import businesses to the north of Bay Street, industrial-zoned (M3-1-RIO) property to the west developed with a surface parking lot and one-story commercial/industrial buildings, Sacramento Street to the south with warehouse uses to the south of Sacramento Street, and industrial-zoned (M3-1-RIO) properties to the east used for surface parking and the BNSF railroad. Beyond the BNSF railroad to the east is the Los Angeles River. Similar to the Project Site, the surrounding properties are zoned M3-1-RIO and designated for Heavy Manufacturing land uses by the Central City North Community Plan.

The Project Site is located at the southern edge of the Arts District area, which has experienced residential and commercial growth over the past decade. Former industrial and warehouse buildings continue to be converted for commercial uses and live/work spaces. As shown in Figure A-2 on page A-5, the Project vicinity is developed with a mix of light industrial, heavy industrial, warehouse, and commercial uses. Adjacent uses include textile and import businesses to the north, including a motorcycle dealership (Falcon Motorcycles) directly north of the Project Site across Bay Street, a surface parking lot and railroad yard to the east, knitting mills and fabric warehouses to the south, and a surface parking lot and one-story commercial/industrial building to the west.

The Project Site is also located approximately 0.5 mile south of the 6th Street Viaduct project that is currently under construction and will provide a two-way multi-modal bridge with dedicated bicycle lanes that will span the Los Angeles River and connect to the Boyle Heights neighborhood to

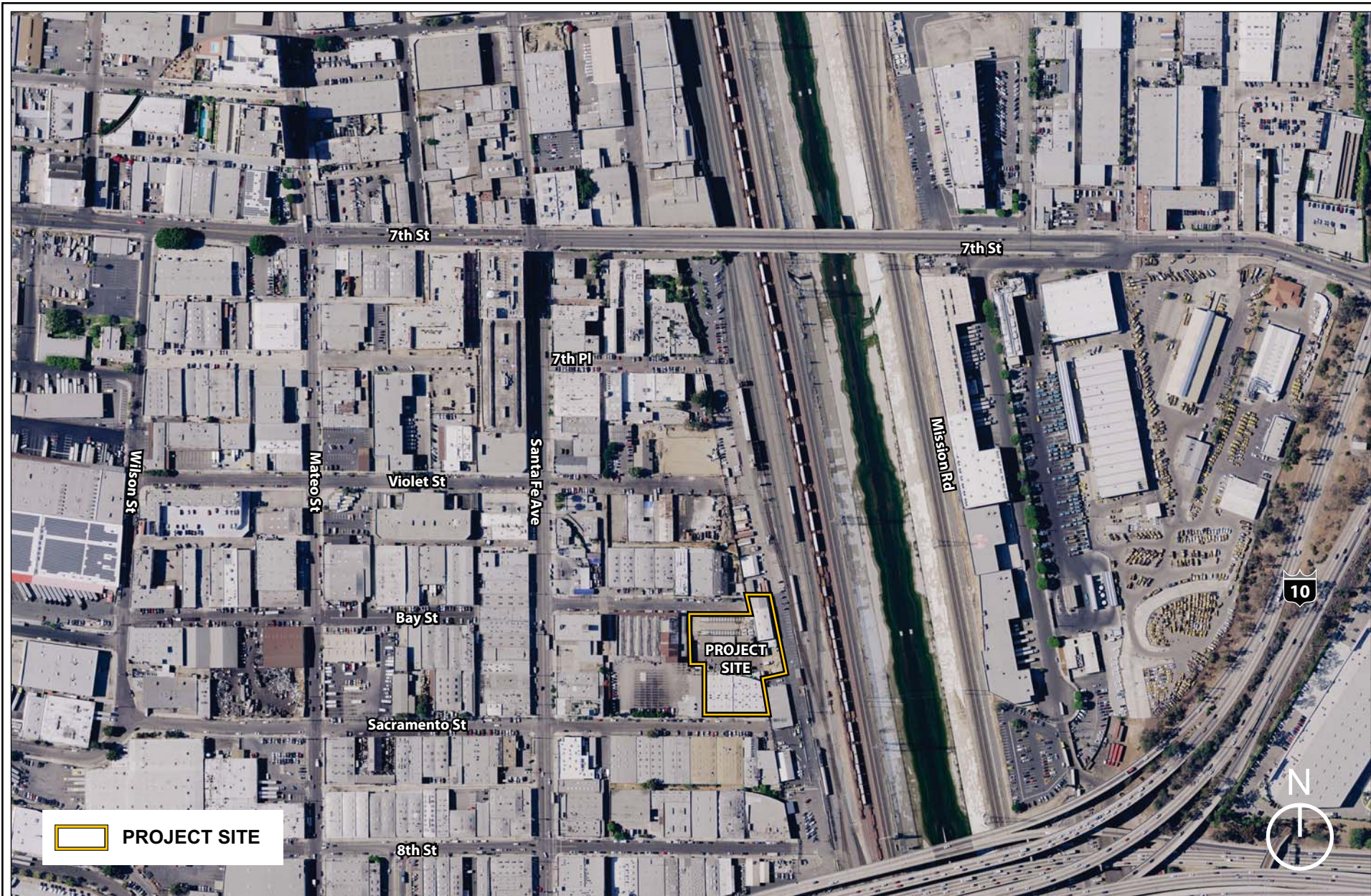


Figure A-2
Aerial Photograph of Project Vicinity

the east.¹ Plans also call for new recreational green spaces on former industrial sites underneath the new bridge.²

C. Description of the Project

1. Project Overview

The Project includes the development of a three-building creative office campus on a 74,063-square-foot (1.7-acre) site located in the Arts District area of the City. As shown in Table A-2 on page A-7, proposed new uses would specifically include 202,954 square feet of creative office space, 16,000 square feet of retail and restaurant space, and 3,235 square feet of event and meeting space. The new uses would be located in an eight-story commercial high-rise building with a maximum height of 140.5 feet and two two-story commercial buildings. The Project would also provide a total of 711 vehicle parking spaces within up to two levels of subterranean parking levels and one ground floor parking level. To provide for the Project, all existing on-site structures would be removed.

Overall, as shown in Table A-2, the Project would remove approximately 39,328 square feet of existing floor area and develop approximately 222,189 square feet of floor area, resulting in a net increase of approximately 182,861 square feet of floor area. The Project would have a FAR of 3:1.

The proposed buildings would be connected via a north-south pedestrian paseo to link the Project's retail components from Bay Street to Sacramento Street. The pedestrian paseo would be anchored by common open space, street trees, seating areas, and low scale structures to promote an active pedestrian experience on the ground floor. As shown in Figure A-3 on page A-8, the ground level of the campus would include bicycle parking, office lobbies, and various amenities. Office space would be provided on levels 2 through 8 of the high-rise building and would feature outdoor terraces for tenants, as further illustrated in Figure A-4 through Figure A-7 on pages A-9 through A-12.

2. Design and Architecture

As discussed above, the proposed uses would be located in an eight-story commercial high-rise building with a maximum height of 140.5 feet and two two-story commercial buildings with a total FAR of 3:1. The design of the Project is intended to convey a classic industrial architecture that draws from elements of the surrounding neighborhood. The proposed internal pedestrian paseo would create a pedestrian linkage between Bay Street and Sacramento Street. The Project would

¹ City of Los Angeles, Bureau of Engineering, Sixth Street Viaduct Replacement Project, Frequently Asked Questions, www.sixthstreetviaduct.org/faq, accessed January 25, 2018.

² City of Los Angeles, Bureau of Engineering, Sixth Street Viaduct Replacement Project, Parc: About the Project, www.sixthstreetviaduct.org/parcproject, accessed January 25, 2018.

Table A-2
Summary of Existing, Proposed Demolition, and Proposed New Floor Areas

Land Use	Existing	Proposed Demolition	Proposed Construction	Net New
Creative Office	16,000 sf	(16,000 sf)	202,954 sf	186,954 sf
Office	7,106 sf	(7,106 sf)	—	(7,106 sf)
Light Industrial	16,222 sf	(16,222 sf)	—	(16,222 sf)
Retail/Restaurant	—	—	16,000 sf	16,000 sf
Event/Meeting Space	—	—	3,235 sf	3,235 sf
Total	39,328 sf	(39,328 sf)	222,189 sf	182,861 sf
<i>sf = square feet</i> <i>Source: Eyestone Environmental, 2018.</i>				

incorporate glass, masonry, and concrete to blend with the Arts District's industrial context while also allowing for a possible future connection to the Los Angeles River.

The proposed building is characterized by staggered terraces that distinguish each of the eight levels of the high-rise building and break up the façade by providing setbacks from both Bay Street and Sacramento Street. Common spaces such as the pedestrian paseo and the terraces combine social and professional environments that reflect the mixed-use nature of the Project.

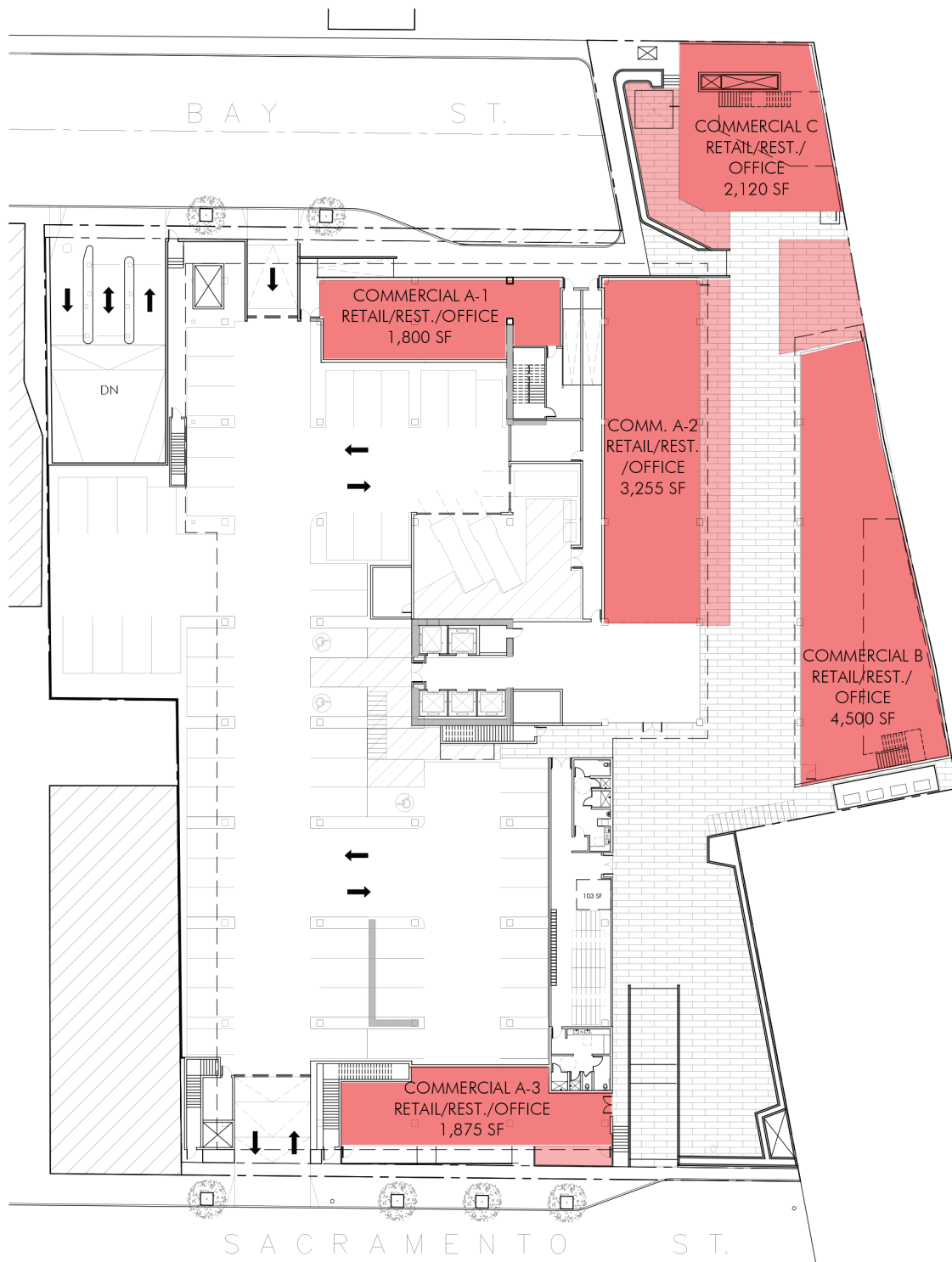
3. Open Space and Landscaping

Open space and landscaping within the Project Site would include a pedestrian paseo connecting Bay and Sacramento Streets through the Project Site, as well as a series of terraces at different levels throughout the proposed buildings. On both ends of the pedestrian paseo, the Project would include landscaped planters. The pedestrian paseo would also incorporate various gathering zones that would be dotted with potted plants.

The streets along the Project Site would be planted with street trees along the Project frontage. In addition, upper terraces would provide views to the nearby downtown skyline and would be landscaped with potted plants. Tree species selected for the street trees and potted plants would be drought-tolerant and/or of a native tree species and would primarily require moist to dry soil conditions. Smart irrigation systems with flow sensors and drip tubing delivery systems would be used.

4. Access, Circulation, and Parking

Vehicular access to the ground level parking areas would be provided via an ingress driveway on Bay Street and an ingress/egress driveway on Sacramento Street. Access to the subterranean



GROUND FLOOR PLAN

Figure A-3
Conceptual Site Plan—Ground Level

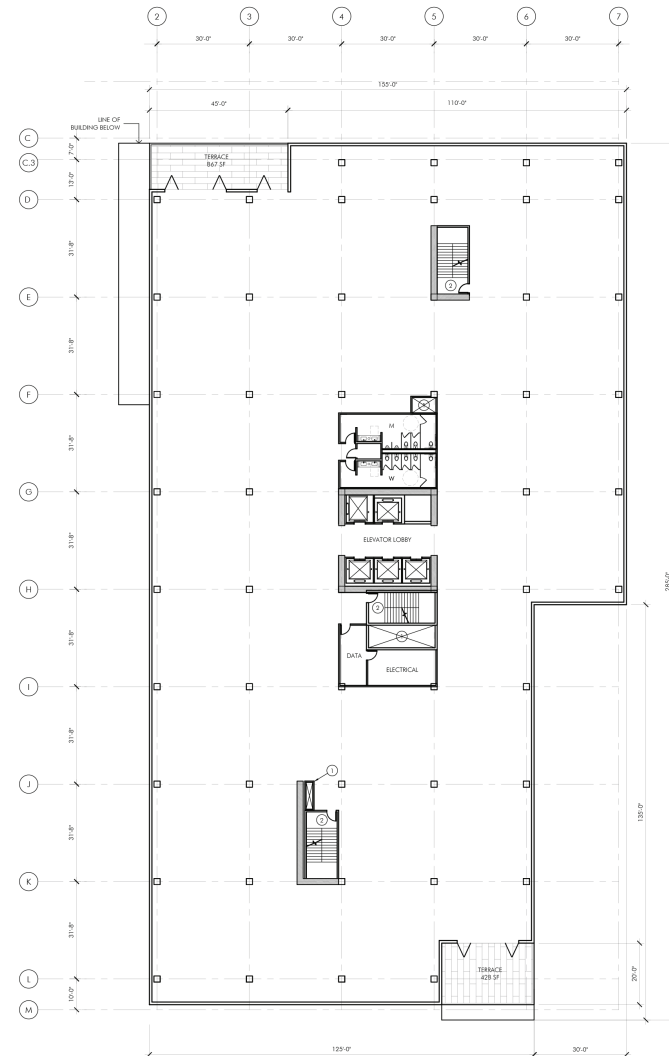
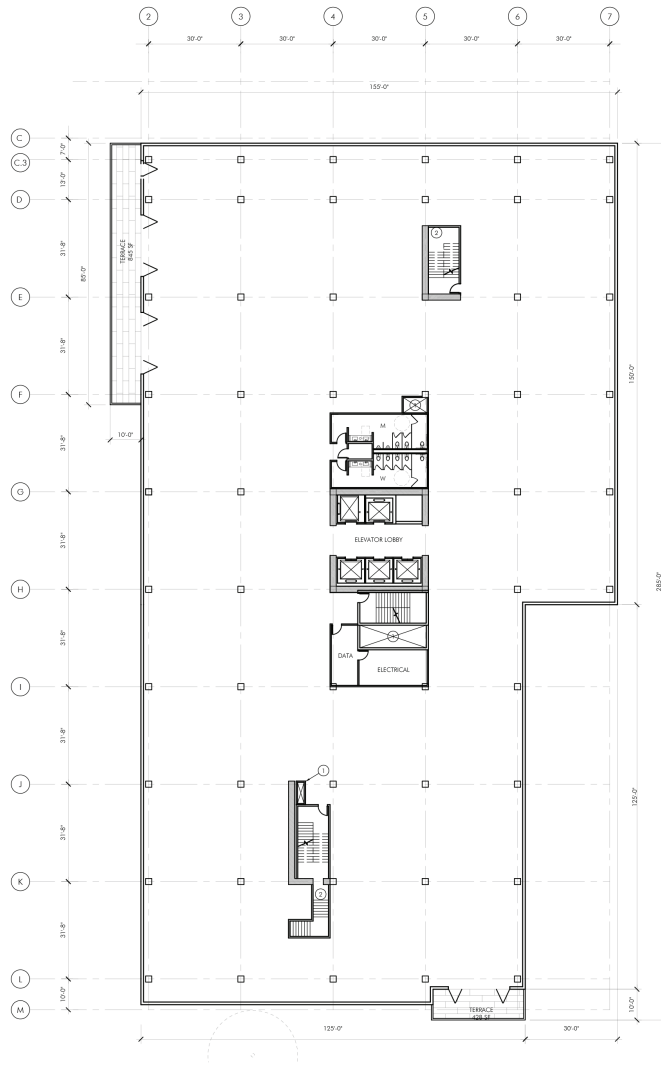
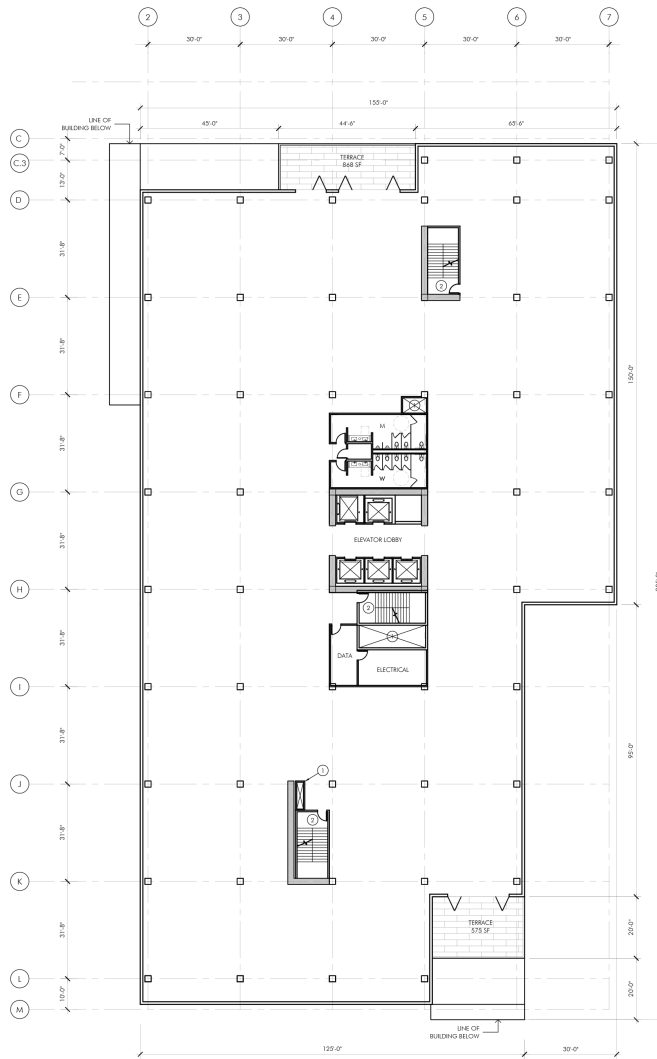
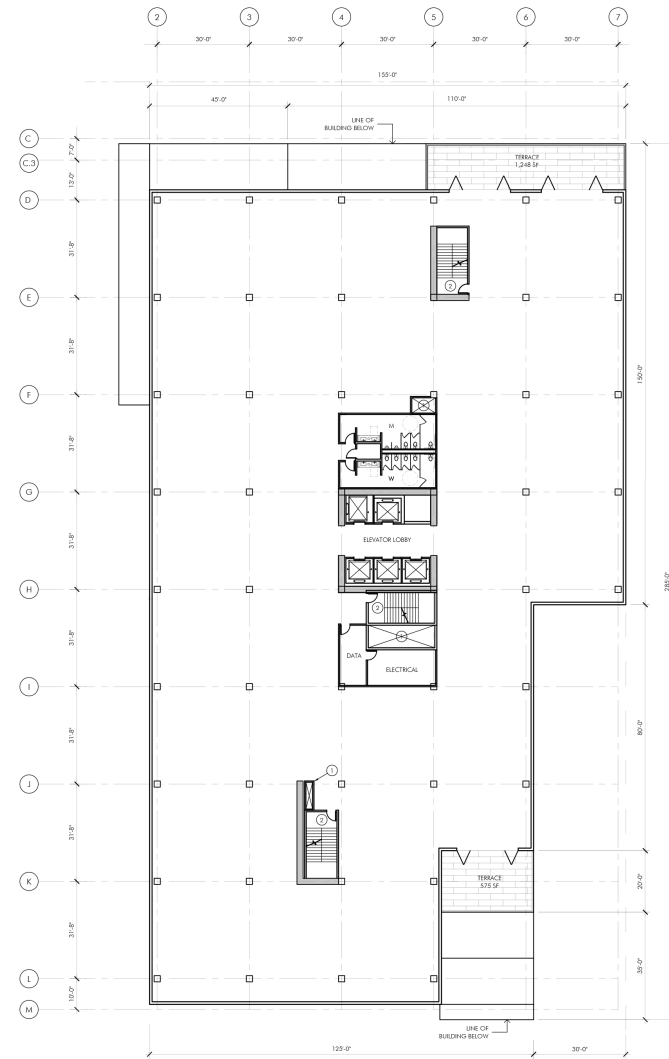


Figure A-4
Conceptual Site Plan—Levels 2–3



4TH FLOOR PLAN



5TH FLOOR PLAN



Figure A-5
Conceptual Site Plan—Levels 4–5

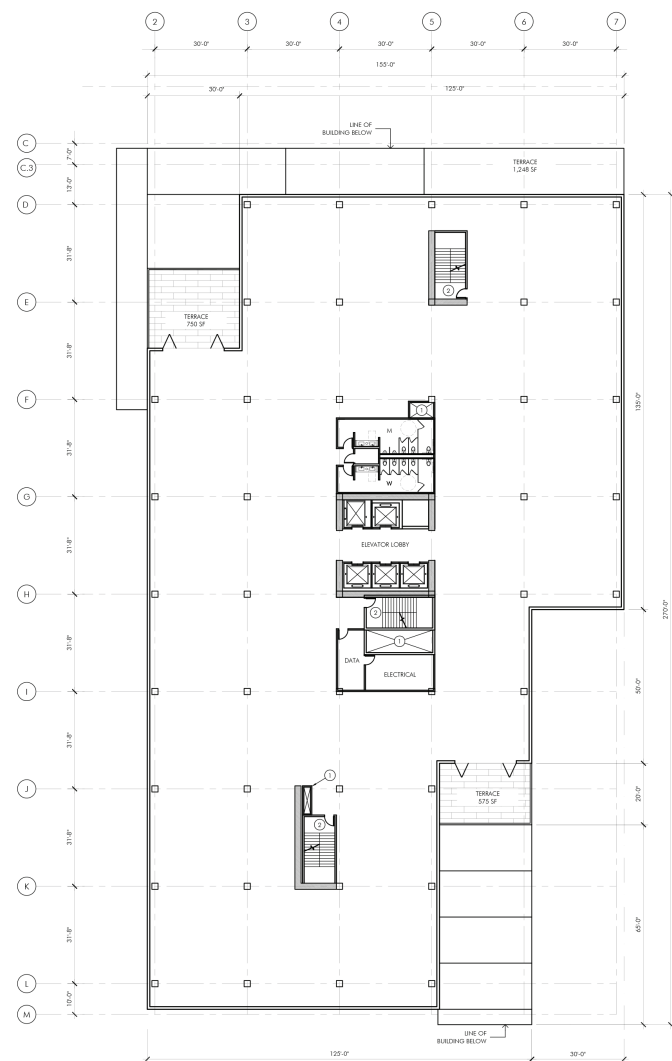
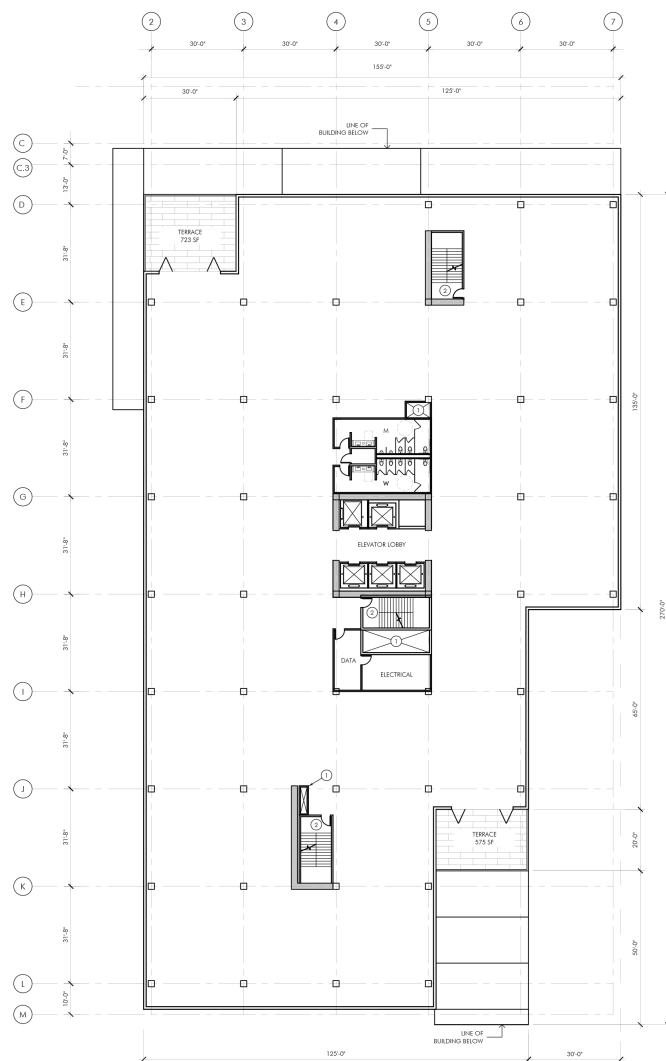
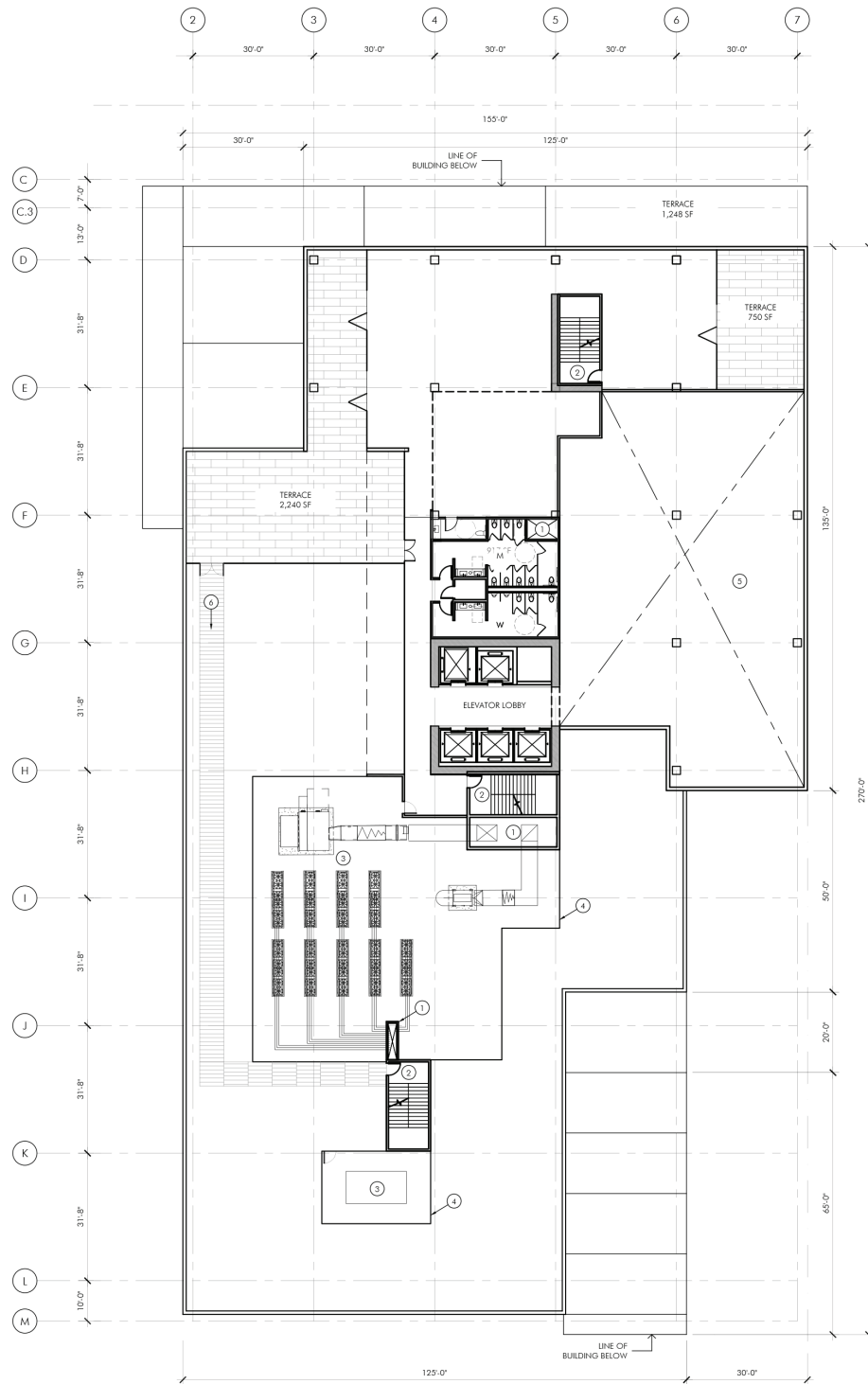


Figure A-6
Conceptual Site Plan—Levels 6–7



PENTHOUSE FLOOR PLAN



Figure A-7
Conceptual Site Plan—Level 8 (Penthouse)

parking levels would be provided via an ingress/egress driveway on Bay Street. Access for trash pickup and other freight vehicles would be provided via a loading dock within the ground level parking area. A proposed drop-off zone on Bay Street would provide a dedicated space for Project employees and patrons arriving via taxi or rideshare services.

Pedestrian access would be provided primarily via newly constructed sidewalks on Bay Street and Sacramento Street. Access to the ground floor retail and restaurant spaces would be provided via the sidewalks and the proposed pedestrian paseo along the east side of the Project Site. Access to the eight-story creative office component would be provided via a lobby accessible from Bay Street to the north, Sacramento Street to the south, and the proposed pedestrian paseo to the east. The Project Site is also situated within walking distance to other commercial businesses located in the Arts District area along the 7th Street, Olympic Boulevard, and Alameda Street corridors, to the north, south, and west of the Project Site.

Public transit service in the vicinity of the Project Site is currently provided by multiple local and regional bus lines, several of which provide connections to Downtown subway stations including Pershing Square and 7th Street/Metro Center. In particular, the Los Angeles County Metropolitan Transit Authority (Metro) provides a bus stop for Metro Local Line 60 located at the corner of South Santa Fe Avenue and Violet Street, approximately 580 feet northwest of the project site.³ A total of five other bus lines, including both local-stop (Metro 18, Metro 62, and Metro 66), and rapid lines (Metro 720 and Metro 760) currently serve the Project Site via stops located within a half mile along 7th Street, Santa Fe Avenue, Olympic Boulevard, and other nearby streets. Additionally, the Greyhound Bus Terminal is located northwest of the Project Site on 7th Street, which provides inter-city bus service to various locations outside of the Los Angeles.

Based on Los Angeles Municipal Code (LAMC) requirements for the proposed land uses, the Project would be required to provide 530 parking spaces. The Project proposes 711 parking spaces that would be located within up to two subterranean levels and the ground level. The Project would comply with City requirements for providing electric vehicle charging capabilities and electric vehicle charging stations within the proposed parking area.

In accordance with LAMC requirements, the Project would require and would provide 91 bicycle parking spaces, including 37 short-term spaces and 54 long-term spaces.

5. Lighting and Signage

Exterior lighting along the public areas would include pedestrian-scale (i.e., lower to the ground, spaced closer together) fixtures. Exterior lighting would incorporate low-level exterior lights on the building and along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage, architectural features, and landscaping elements would be incorporated throughout the site. Project lighting would be designed to minimize light trespass from the Project Site

³ Metro, Nextrip Service (Route 60 Downtown LA–Artesia Station via Long Beach, Stop: Santa Fe/Violet), www.metro.net/riding/nextrip/.

and would comply with all LAMC requirements. All new street and pedestrian lighting within the public right-of-way along Bay Street and Sacramento Street would comply with applicable City regulations and would require approval from the Bureau of Street Lighting in order to maintain appropriate and safe lighting levels on sidewalks and roadways while minimizing light and glare on adjacent properties.

Proposed signage would include mounted project identity signage, building and commercial tenant signage, and general ground-level and wayfinding pedestrian signage. Wayfinding signs would be located at parking garage entrances, elevator lobbies, vestibules, and corridors. All signage would meet the requirements of the LAMC.

6. Site Security

During construction of the Project, temporary security measures including security fencing, lighting, and locked entry would be implemented to ensure security of the Project Site. The Applicant would also implement the following features to enhance on-site safety:

- Lobby areas are designed to be visible from the public streets or entry ways.
- Building entrances and exits, spaces around buildings, and pedestrian walkways are designed to be open and in view of surrounding sites.
- Public spaces are designed to be easily patrolled and accessed by safety personnel.
- Public restrooms and other common facilities would be located in convenient and accessible areas in order to increase use and the perception of safety.
- Sufficient lighting of building entries and walkways would be provided to facilitate pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings.
- Sufficient lighting of parking areas, elevators, and lobbies would be provided to maximize visibility and reduce areas of concealment.
- Access controls in the forms of private on-site security, alarm systems, a closed circuit security camera system, and keycard entry would be included for the creative office building and the parking areas.

7. Sustainability Features

The Project would utilize state of the art green building technology initiatives and eco-friendly sustainability practices. The Project would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen. As a basis of submission, the Project would follow City of Los Angeles Standards and California Building Code 2016. These standards are intended to reduce energy and water usage and waste and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on

natural resources and infrastructure. The Project would be designed to achieve U.S. Green Building Council's (USGBC) Leadership in Energy Efficiency and Design (LEED) Silver equivalence..

Specific sustainable elements integrated within the Project would include:

- Use of daylighting where feasible in the Project to reduce the electrical consumption load and maximize natural light for occupants.
- Use of recycled and locally sourced materials where feasible.
- Use of drought resistant landscaping to reduce irrigation water use.
- Implementation of feasible methods to delay or reduce storm water discharge, and improve the quality of storm run-off (e.g., infiltration systems, stormwater capture and use, etc.).
- Use of fixtures, irrigation systems and integrated building monitoring systems that can reduce water use.
- Implementation of a TDM program, as necessary.
- Re-use of existing commercial land.
- Implementation of a bike parking system in accordance with City requirements.
- Implementation of energy-efficient site lighting and design to meet Title-24 lighting density control standards.
- Placement of more than 50 percent of parking under the building and use of landscaping and reflective materials to address heat island effect as feasible.
- Implementation of building systems designed to avoid the use of heating, refrigeration, and fire suppression systems that include chlorofluorocarbons or halon compounds.
- Use of building energy modeling to improve energy performance.
- Implementation of energy efficient building envelope design, including high performance glazing, cool roof, and optimized insulation levels.
- Use of energy efficient lighting and HVAC equipment.
- Implementation of building commissioning practices to fine-tune energy using system performance.
- Implementation of building energy management controls system to optimize energy performance on an ongoing basis.
- Provision for electric vehicle charging (10% of Code-required parking prewired with 5% of Code-required parking further improved with charging stations).
- Implementation of a construction waste management plan.

- Implementation of indoor environmental quality measures.
- Accommodation of future photovoltaic array on the roof.

Additionally, in accordance with CEQA Guidelines Appendix F, the EIR will provide further information as to energy conservation, energy implications, and the energy-consuming equipment and processes that would be used during Project construction and operation. Design features of the Project, energy supplies that would serve the Project, and total estimated daily vehicle trips that would be generated by the Project will also be analyzed. In addition, while development of the Project would not be anticipated to cause the wasteful, inefficient, and unnecessary consumption of energy and would be consistent with the intent of Appendix F of the CEQA Guidelines, further analysis of the Project's consistency with Appendix F will also be provided in the EIR.

8. Anticipated Construction Schedule

Construction of the Project would commence with demolition of the existing building, followed by grading and excavation. Building foundations would then be laid, followed by building construction, and landscape installation. Project construction is anticipated to be completed by 2025. The construction haul route from the Project Site is anticipated to be via Bay Street or Sacramento Street, then to Santa Fe Avenue, and then to the I-10 Freeway. The Project may require excavation up to 42 feet below ground surface. In addition, it is estimated that approximately 140,000 cubic yards would be exported from the Project Site.

D. Requested Permits and Approvals

The discretionary entitlements, reviews, permits and approvals required to implement the Project include, but are not necessarily limited to, the following:

- Pursuant to LAMC Section 12.32.Q, a Vesting Zone and Height District Change from M3-1-RIO to M3-2D-RIO.
- Pursuant to LAMC Section 16.50, Site Plan Review for the construction of a mixed-use commercial building with 222,189 square feet of floor area.
- Pursuant to LAMC Section 12.28, a Zoning Administrator's Adjustment to allow use of pre-dedication lot area to calculate FAR.
- Pursuant to LAMC Section 12.24 W.1, a Master Conditional Use Permit to allow the sale and/or dispensing of a full line of alcoholic beverages for on- and off-site consumption for up to six establishments.
- Pursuant to LAMC Section 17.15, a Vesting Tentative Tract Map with one ground lot and four commercial condominium units.
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, haul route approval, foundation permits, building permits, and sign permits.

B. Environmental Checklist

ATTACHMENT B—ENVIRONMENTAL CHECKLIST

Explanation of Checklist Determinations

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. Would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
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?	☐	☐	☒	☐

Would the project:

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

Less Than Significant Impact. A scenic vista is a view of a valued visual resource. Scenic vistas generally include public views that provide visual access to large panoramic views of natural features, unusual terrain, or unique urban or historic features. A scenic vista field of view can be wide, extend into the distance, and include focal views that focus on a particular object, scene, or feature of interest for the benefit of the general public.

As described in Part A, Project Description, of this Initial Study, the Project Site is currently developed with three buildings that comprise the following: 7,106 square feet of office uses in Building A; 16,222 square feet of light industrial uses in Building B and C; and 16,000 square feet of creative office uses in Building C. Existing uses include engineering and test development operations, office operations, and fabrication and machining operations. Exterior areas in the central and eastern portions of the Project Site are used for storage, equipment staging, and exterior operations. Other smaller structures at the Project Site include shipping containers that have been converted into offices and conference rooms, tents used for welding operations and meetings, and stacked parking systems. In addition, designated areas for storage of industrial byproducts and

materials associated with on-site uses are located on the south side of Building C. The Project Site is relatively flat with limited ornamental landscaping.

The Project Site is located within a highly urbanized area of the City of Los Angeles. The Project vicinity currently lacks a thematic aesthetic character largely due to the transitional nature of the neighborhood. The area surrounding the Project Site contains an eclectic mix of buildings that vary in age, architecture, heights, massing, and materials. Additionally, buildings in the Project vicinity vary in age and physical condition, with some of the buildings in varying stages of disrepair and others that have been redeveloped as residential, office, and restaurant spaces. The visual character of the Project area continues to transform and improve with new and on-going developments that incorporate both the historic and contemporary nature of the area.

Visual resources in the general vicinity of the Project Site include the Los Angeles River, the downtown Los Angeles skyline, and structures that are considered historic resources. Views of these resources from public rights-of-way are limited due to the predominantly flat terrain of the vicinity and the dense, intervening development that blocks long-range, expansive views. Visual resources that can be seen in combination with the Project Site are primarily limited to those located adjacent to the Project Site due to the densely developed nature of the Project Site area.

As discussed in Part A, Project Description, of this Initial Study, the Project would replace existing buildings with approximately 202,954 square feet of creative office space, 16,000 square feet of retail and restaurant space, and 3,235 square feet of event and meeting space. The new uses would be located in an eight-story commercial high-rise building with a maximum height of 140.5 feet and two two-story commercial buildings. The Project would also provide a total of 711 vehicle parking spaces in up to two levels of subterranean parking levels and one ground floor parking level.

With the introduction of the eight-story building, short-range views from street-level vantage points adjacent to the Project Site would be modified. The building would be more prominently visible, would be taller, and would have more perceived bulk than the existing low-rise structures. However, given the location of the Project Site and existing dense intervening development, the eight-story building and two two-story buildings would not block public short-range views of visual resources such as the nearby Los Angeles River or nearby historic resources. The increased height and mass of the buildings on the Project Site may be visible from more distant locations and may be within the same viewshed of the downtown Los Angeles skyline. However, given the distance to the downtown skyline, any such views are very limited and intermittent and are primarily only available from public roadways, and the Project would not completely obscure views of the skyline.

Based on the above, the Project would not have a substantial adverse impact on scenic vista. Therefore, no further evaluation of this topic in an EIR is required.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a state scenic highway?

No Impact. The Project Site is not located along a state scenic highway. The nearest officially eligible state scenic highway is along the Foothill Freeway (I-210), approximately 9.2 miles

northeast of the Project Site,¹ and the nearest City-designated scenic parkway is along Stadium Way between the I-5 and I-110 Freeways, approximately 2.6 miles north of the Project Site.² Therefore, the Project would not substantially damage scenic resources within a state or City-designated scenic highway. Therefore, no further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. As discussed above in Response to Checklist Question I.a, the Project vicinity currently lacks a thematic aesthetic character largely due to the transitional nature of the neighborhood. The area surrounding the Project Site contains an eclectic mix of buildings that vary in age, architecture, heights, massing, and materials. Additionally, buildings in the Project vicinity vary in age and physical condition, with some of the buildings in varying stages of disrepair and others that have been redeveloped as residential, office, and restaurant spaces. Furthermore, the surrounding uses in the Project vicinity include features that degrade the visual quality of the surrounding such as graffiti and dilapidated structures, which can both be found directly adjacent to the Project Site. The visual character of the Project area continues to transform and improve with new and on-going developments that incorporate both the historic and contemporary nature of the area.

Construction

Construction activities generally cause a temporary contrast to, and disruption in, the general order and aesthetic character of an area. Although temporary in nature, construction activities may cause a visually unappealing quality in a community. During construction activities for the Project, the visual appearance of the Project Site would be altered due to the removal of the existing structures and the presence of construction equipment. Some of the activity would be visible from roadways adjacent to the Project Site, as well as to viewers within nearby buildings. However, temporary construction fencing would be placed along the periphery of the Project Site to screen much of the construction activity from view at the street level, and graffiti would be removed, as needed, from all temporary walkways and construction fencing throughout the Project construction period. In addition, the Project Site does not include any trees, and no street trees are located within the public right-of-way. Thus, construction of the Project would not impact trees.

Overall, while affecting the visual character of the Project area on a short-term basis, Project construction activities would not substantially alter or degrade the existing visual character or quality of the Project Site and surrounding area, for the following reasons: (1) views of construction activity would be limited in duration and location; (2) the Project Site appearance would be typical of construction sites in urban areas; (3) construction would occur within an urban setting with a high level of human activity and development; and (4) construction fencing would be placed along the periphery of the Project Site to screen much of the construction activity from view at the street level.

¹ California Scenic Highway Mapping System, Los Angeles County, www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm, accessed January 9, 2018.

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

Operation

As discussed above, the Project would remove three buildings and ancillary structures. As discussed in Response to Checklist Question V, below, the existing buildings to be removed are not historic resources. In addition, the buildings are not unique scenic resources. The existing buildings would be replaced with an eight-story building and two two-story buildings. As described in Part A, Project Description, of this Initial Study, the design of the Project is intended to convey a classic industrial architecture that draws from elements of the surrounding neighborhood. In particular, the Project would incorporate glass, masonry, and concrete to blend with the Arts District's industrial context while also allowing for a possible future connection to the Los Angeles River. The proposed building is characterized by staggered terraces that distinguish each of the eight levels of the high-rise building and break up the façade by providing setbacks from both Bay Street and Sacramento Street. In addition, the proposed internal pedestrian paseo would create a pedestrian linkage between Bay Street and Sacramento Street. Parking would be located within up to two subterranean levels and a ground floor level where parking would be screened from street view by commercial uses.

The Project would become part of the existing urban fabric, and the Project massing, height, and aesthetic character would be consistent with many of the existing and proposed commercial and residential structures in the vicinity of the Project Site. In particular, the building materials and the articulation of the building, which would include staggered terraces, would ensure that the building would blend into the existing streetscape. In addition, the proposed maximum height of up to eight stories and approximately 140.5 feet would be similar to other building heights in the vicinity, including the six-story building on the southeast corner of Bay Street and Santa Fe Avenue, located approximately 253 feet west of the Project Site. Furthermore, the Project area continues to change, with new and ongoing developments incorporating mixed uses with mid- and high-rise buildings of contemporary design. Overall, the Project would not be in substantial conflict with the surrounding visual environment in terms of building height, design, massing, or scale.

Proposed signage would include mounted project identity signage, building and commercial tenant signage, and general ground-level and wayfinding pedestrian signage. Wayfinding signs would be located at parking garage entrances, elevator lobbies, vestibules, and corridors. Proposed signage would be designed to be aesthetically compatible with the proposed architecture of the Project Site and with the requirements of the LAMC. The proposed signage would not substantially degrade the existing visual character or quality of the Project Site or surrounding vicinity.

Based on the analysis above, the Project would not substantially degrade the existing visual character or quality of the Project Site or surrounding vicinity. Therefore, no further evaluation of this topic in an EIR is required.

Shading

As provided in the LA CEQA Thresholds Guide, the visual character or quality of a site and its surroundings can also be affected by shading cast upon adjacent areas by proposed structures. Shadows may provide positive effects, such as cooling effects during warm weather, or negative effects, such as the loss of natural light necessary for solar energy purposes, or the loss of warming influences during cool weather. Shadow effects depend on several factors, including the local

topography, height and bulk of a project's structural elements, sensitivity of adjacent land uses, existing conditions on adjacent land uses, season, and duration of shadow projection. According to the LA CEQA Thresholds Guide, facilities and operations sensitive to the effects of shading include: routinely useable outdoor spaces associated with residential, recreational, or institutional land uses (e.g., schools, convalescent homes); commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor dining areas; nurseries; and existing solar collectors. According to the LA CEQA Thresholds Guide, a proposed project would have a significant shading impact if shadow sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9:00 A.M. and 3:00 P.M. Pacific Standard Time (between early November and early March), or more than four hours between the hours of 9:00 A.M. and 5:00 P.M. Pacific Daylight Time (between early March and early November).

As previously discussed, the Project vicinity is developed with a mix of light industrial, heavy industrial, warehouse, and commercial uses. Adjacent uses include textile and import businesses to the north, a surface parking lot to the east, knitting mills and fabric warehouses to the south, and a vehicle towing facility to the west. None of these uses are considered sensitive to shading and they do not contain routinely useable outdoor spaces including outdoor dining areas, patios, or pools. Therefore, the shadows to be generated by the Project would not substantially degrade the existing visual character or quality of the Project Site and its surroundings. For informational purposes, shading diagrams are provided in Appendix IS-1, of this Initial Study. Therefore, no further evaluation of this topic in an EIR is required.

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

No Impact. The Project Site currently generates moderate levels of artificial light and glare typical of an urban area. Existing light sources within the Project Site include low-level security lighting, interior lighting emanating from the existing buildings, and vehicle headlights. Existing glare sources within the Project Site include glass and metal vehicle and building surfaces. The Project would introduce new sources of light and glare that are typically associated with commercial/office uses and that would be compatible with the existing buildings, including low-level exterior lighting on the buildings and along pathways for security and wayfinding purposes. Furthermore, the Project would include new low- and high-rise buildings, which would introduce an increased amount of nighttime lighting as compared to existing conditions. However, light levels from these buildings would be consistent with lighting from other nearby buildings. Thus, the Project would not create substantial light or glare that would adversely affect daytime or nighttime views in the area. Therefore, no further evaluation of this topic in an EIR is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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II. AGRICULTURE AND FOREST RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies

may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

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

Would the project:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. The Project Site is located in an urbanized area of the City of Los Angeles. As discussed in Part A, Project Description, of this Initial Study, the Project Site is currently developed with three buildings used for engineering and test development operations, office operations, and fabrication and machining operations. Other smaller on-site structures include converted shipping containers, tents for welding operations and meetings, and parking stackers. No agricultural uses or operations occur on-site or in the vicinity of the Project Site. The Project Site and surrounding area are also not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency

Department of Conservation.³ As such, the Project would not convert farmland to a non-agricultural use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The Project Site is zoned by the Los Angeles Municipal Code (LAMC) as M3-1-RIO (Heavy Manufacturing, River Improvement Overlay). The Project Site is not zoned for agricultural use. Furthermore, none of the surrounding properties are zoned for agricultural use. The Project Site and surrounding area are also not enrolled under a Williamson Act Contract.⁴ Therefore, the Project would not conflict with any zoning for agricultural uses or a Williamson Act Contract. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. As previously discussed, the Project Site is located in an urbanized area and is currently developed with three buildings used for engineering and test development operations, office operations, and fabrication and machining operations. The Project Site does not include any forest land or timberland. In addition, the Project Site is currently zoned for industrial uses and is not zoned and/or used as forest land.⁵ Therefore, the Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland as defined by the Public Resources Code. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

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

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

³ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report, <http://zimas.lacity.org/>, accessed January 4, 2018.

⁴ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report, <http://zimas.lacity.org/>, accessed January 4, 2018.

⁵ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report, <http://zimas.lacity.org/>, accessed January 4, 2018.

No Impact. The Project Site is located in an urbanized area of the City of Los Angeles and does not include farmland. The Project Site and surrounding area are not mapped as farmland, are not zoned for farmland or agricultural use, and do not contain any agricultural uses.⁶ As such, the Project would not result in the conversion of farmland to non-agricultural use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.

Would the project:

- | | | | | |
|---|-------------------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Conflict with or obstruct implementation of the applicable air quality plan? | ☒ | ☐ | ☐ | ☐ |
| 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)? | ☒ | ☐ | ☐ | ☐ |
| d. Expose sensitive receptors to substantial pollutant concentrations? | ☒ | ☐ | ☐ | ☐ |
| e. Create objectionable odors affecting a substantial number of people? | ☐ | ☐ | ☒ | ☐ |

Would the project:

a) Conflict with or obstruct implementation of the Air Quality Management Plan or Congestion Management Plan?

Potentially Significant Impact. The Project Site is located within the 6,700-square-mile South Coast Air Basin (Air Basin). Within the Air Basin, the South Coast Air Quality Management District (SCAQMD) is required, pursuant to the federal and state Clean Air Acts, to reduce emissions of criteria pollutants for which the Air Basin is in non-attainment (i.e., ozone, particulate matter less than 2.5 microns in size [PM_{2.5}], PM₁₀, and lead⁷). The SCAQMD's 2016 Air Quality Management

⁶ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report, <http://zimas.lacity.org/>, accessed January 4, 2018.

⁷ Partial Nonattainment designation for lead for the Los Angeles County portion of the Air Basin only.

Plan (AQMP) contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG). SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment.⁸ With regard to future growth, SCAG has prepared the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS), which provides population, housing, and employment projections for cities under its jurisdiction. The growth projections in the 2016–2040 RTP/SCS are based on growth projections in local general plans for jurisdictions in SCAG's planning area.

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

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

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

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

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

⁸ SCAG serves as the federally designated metropolitan planning organization (MPO) for the Southern California region.

d) Expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. As discussed above, the Project would result in increased short- and long-term air pollutant emissions from the Project Site during construction (short-term) and operation (long-term). Sensitive receptors in the Project area include live/work units within 500 feet of the Project Site. Therefore, the Project could expose sensitive receptors to substantial pollutant concentrations and the EIR will provide further analysis of the Project's potential to result in substantial adverse impacts to sensitive receptors.

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

Less Than Significant Impact. Construction of the Project would involve the use of conventional building materials typical of construction projects of similar type and size. Any odors that may be generated during construction (e.g., equipment exhaust, off-gassing of asphalt, paint vapors, etc.) would be localized and temporary in nature and would not be sufficient to affect a substantial number of people.

With respect to Project operation, according to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project would not involve these types of uses. On-site trash receptacles would be contained, located, and maintained in a manner that promotes odor control, and would not result in substantially adverse odor impacts. Construction and operation of the Project would also comply with SCAQMD Rules 402, which provides that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.⁹

Based on the above, the project would not create odors affecting a substantial number of people. Therefore, the potential odor impact during construction and operation of the Project would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

⁹ SCAQMD, Rule 402, Nuisance.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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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, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service? | ☐ | ☐ | ☐ | ☒ |
| 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? | ☐ | ☐ | ☐ | ☒ |

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?

No Impact. The Project Site is located in an urbanized area and is currently occupied by three buildings used for engineering and test development operations, office operations, and fabrication and machining operations. As discussed in Attachment A, Project Description, of this Initial Study, the Project Site is relatively flat with limited ornamental landscaping. Due to the urbanized and disturbed nature of the Project Site and the surrounding areas, and lack of large

expanses of open space areas, species likely to occur on-site are limited to small terrestrial and avian species typically found in developed settings. Based on the lack of habitat on the Project Site, it is unlikely any special status species listed by the California Department of Fish and Wildlife¹⁰ or by the U.S. Fish and Wildlife Service¹¹ would be present on-site. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area as defined by the City of Los Angeles.¹² Therefore, the Project would not have any adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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

No Impact. The Project Site is located in an urbanized area and is currently occupied by creative offices, production support, and sound stages. No riparian or other sensitive natural community exists on the Project Site.^{13,14} Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City of Los Angeles or County of Los Angeles.^{15,16} In addition, there are no other sensitive natural communities identified by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service.^{17,18,19} Although the Project Site is in proximity to the Los Angeles River, development of the Project would not have an adverse effect on any riparian habitat in the Los Angeles River since the Project would not encroach into the Los Angeles River and since the portion of the Los Angeles River near the Project Site is concrete lined and the primary areas of the river that presently support riparian habitat are the Sepulveda Basin (approximately 15 miles northwest of the Project area) and the Glendale Narrows (approximately 5 miles north of the Project Site).²⁰ Therefore, the Project would not have a

¹⁰ California Department of Fish and Wildlife, California Natural Diversity Database, Special Animals List, April 2017.

¹¹ United States Fish and Wildlife Service, ECOS Environmental Conservation Online System, Listed species believed to or known to occur in California, <https://ecos.fws.gov/ecp0/reports/species-listed-by-state-report?state=CA&status=listed>, accessed January 4, 2018.

¹² City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, P. 2-18-4.

¹³ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed January 4, 2018.

¹⁴ U.S. Environmental Protection Agency, NEPAassist, www.epa.gov/nepa/nepassist, accessed January 5, 2018.

¹⁵ City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, P. 2-18-4.

¹⁶ Los Angeles County, Los Angeles County General Plan, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, October 6, 2015.

¹⁷ California Department of Fish and Wildlife, Biogeographic Information and Observation System (BIOS), www.wildlife.ca.gov/Data/BIOS, accessed January 5, 2018.

¹⁸ California Department of Fish and Wildlife, CDFW Lands, <https://www.wildlife.ca.gov/Lands>, accessed January 5, 2018.

¹⁹ U.S. Fish and Wildlife Service, National Wetlands Inventory, www.fws.gov/wetlands/index.html, accessed January 5, 2018.

²⁰ City of Los Angeles, Los Angeles River Revitalization, Ecosystem, <http://lariver.org/ecosystem>, accessed February 2, 2018.

substantial adverse effect on any riparian habitat or other sensitive natural community. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. The Project Site is located in an urbanized area and is currently occupied by creative offices, production support, and sound stages. In addition, the surrounding area has been fully developed, and the Los Angeles River further to the east of the Project Site is concrete lined. No water bodies or federally protected wetlands as defined by Section 404 of the Clean Water Act exist on the Project Site.²¹ As such, the Project would not have an adverse effect on federally protected wetlands. No impact would occur, and no mitigation measures are required. Therefore, no further evaluation of this topic in an EIR is required.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less Than Significant Impact. As described above, the Project Site is located in an urbanized area and is currently occupied by three buildings used for engineering and test development operations, office operations, and fabrication and machining operations. Based on the Tree Report included in Appendix IS-2 of this Initial Study, there are no trees on the property or within the public right-of-way that would be removed during construction of the Project. In addition, the areas surrounding the Project Site are fully developed, and there are no large expanses of open space areas within and surrounding the Project Site that provide linkages to natural open spaces areas and that may serve as wildlife corridors. While the Los Angeles River is located further to the east of the Project Site, it is concrete-lined in its nearest stretch and is separated from the Project Site by rail facilities and fences. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City of Los Angeles or County of Los Angeles.^{22,23}

Based on the above, the Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. Impacts would be less than significant, and no mitigation measures are required. Therefore, no further evaluation of this topic in an EIR is required.

²¹ U.S. Environmental Protection Agency, NEPAassist, www.epa.gov/nepa/nepassist, accessed January 5, 2018.

²² City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, P. 2-18-4.

²³ Los Angeles County, Los Angeles County General Plan, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, October 6, 2015.

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

No Impact. The City of Los Angeles Protected Tree Ordinance (LAMC Chapter IV, Article 6) regulates the relocation or removal of all Southern California native oak trees (excluding scrub oak), California black walnut trees, Western sycamore trees, and California Bay trees of at least four inches in diameter at breast height. These tree species are defined as “protected” by the City of Los Angeles. Trees that have been planted as part of a tree planting program are exempt from the City’s Protected Tree Ordinance and are not considered protected. The City’s Protected Tree Ordinance prohibits, without a permit, the removal of any regulated protected tree, including “acts which inflict damage upon root systems or other parts of the tree...” and requires that all regulated protected trees that are removed be replaced on at least a 2:1 basis with trees that are of a protected variety.

Based on the Tree Report included in Appendix IS-2 of this Initial Study, no trees are located on-site or in the public right-of-way. Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources. No Impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. The Project Site is located in an urbanized area and is currently occupied by creative offices, production support, and sound stages. As described above, the Project Site does not support any habitat or natural community.^{24,25} The Project Site is located west of the Los Angeles River and is within the River Improvement Overlay (RIO) District, Inner Core. Development of the Proposed Project would comply with the applicable development standards and guidelines for the RIO District, including landscaping guidelines, which would ensure that the Proposed Project does not conflict with a conservation plan.

No Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site.²⁶ Thus, the Project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other related plans. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

²⁴ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed January 5, 2018.

²⁵ United States Environmental Protection Agency, NEPAassist, www.epa.gov/nepa/nepaassist, accessed January 5, 2018.

²⁶ The Geotechnical Assessment prepared for the Project identifies the Puente Hills Blind Thrust Fault as being 1 mile from the Project Site. The City’s ZIMAS report indicates the fault is located 0.7 mile from the Project Site. The fault is a buried fault with no surface trace, so variances in interpretation of the distances may occur. The distance provided in ZIMAS is the most conservative estimate.

	Potentially Significant Impact	Less Than Significant with 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?	☒	☐	☐	☐
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 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 dedicated cemeteries?	☐	☐	☒	☐

Would the project:

a) Cause a substantial adverse change in the significance of a historical resource as defined in State CEQA Guidelines §15064.5?

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

The buildings located on the Project Site were constructed between 1923 and 1941.²⁷ Based on the age of the on-site buildings and presence of known historical resources in the Project vicinity,

²⁷ Los Angeles County, Office of the Assessor, "Property Assessment Information System," http://maps.assessor.lacounty.gov/GVH_2_2/Index.html?configBase=http://maps.assessor.lacounty.gov/Geocortex/Essentials/REST/sites/PAIS/viewers/PAIS_hv/virtualdirectory/Resources/Config/Default, accessed May 3, 2018.

the Project has the potential to directly and indirectly affect historical resources. Therefore, the EIR will provide further analysis of the Project's potential impacts to historical resources.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines §15064.5?

Potentially Significant Impact. CEQA Guidelines Section 15064.5(a)(3)(D) generally defines archaeological resources as any resource that “has yielded, or may be likely to yield, information important in prehistory or history.” Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community. The Project Site is located within an urbanized area of the City of Los Angeles and has been subject to grading and development in the past. Therefore, surficial archaeological resources that may have existed at one time have likely been previously disturbed. Nevertheless, it is estimated that approximately 140,000 cubic yards of export material would be hauled from the Project Site during the construction phase. Thus, the Project could have the potential to disturb previously undiscovered archaeological resources. Therefore, the EIR will provide further analysis of the Project's potential impacts to archaeological resources.

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

Potentially Significant Impact. Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms that are now extinct. Public Resources Code Section 5097.5 specifies that any unauthorized removal of paleontological remains is a misdemeanor. Furthermore, California Penal Code Section 622.5 includes penalties for damage or removal of paleontological resources. Although the Project Site has been previously graded and developed, the Project would require additional grading and excavation which would have the potential to disturb previously undiscovered paleontological resources that may exist within the Project Site. Therefore, the EIR will provide further analysis of the Project's potential impacts to paleontological resources.

d) Disturb any human remains, including those interred outside of formal cemeteries?

Less Than Significant Impact. Although no human remains are known to have been found on the Project Site, there is the possibility that unknown resources could be encountered during Project construction, particularly during ground-disturbing activities, such as grading and excavation. While the uncovering of human remains is not anticipated, if human remains are inadvertently discovered during construction, such resources would be treated in accordance with state law, including PRC Section 5097.98 and California Health and Safety Code Section 7050.5. Specifically, if human remains are encountered, work on the portion of the Project Site where remains have been uncovered would be suspended and the City of Los Angeles Public Works Department and the County Coroner would be immediately notified. If the remains are determined by the County Coroner to be Native American, the Native American Heritage Commission (NAHC) would be notified within 24 hours, and the guidelines of the NAHC would be adhered to in the treatment and disposition of the remains.

Therefore, due to the low potential that any human remains are located on the Project Site, and because compliance with the regulatory standards described above would ensure appropriate treatment of any potential human remains unexpectedly encountered during grading activities, the Project's impact on human remains would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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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, caused in whole or in part by the project's exacerbation of the existing environmental conditions? Refer to Division of Mines and Geology Special Publication 42. | ☐ | ☐ | ☒ | ☐ |
| ii. Strong seismic ground shaking caused in whole or in part by the project's exacerbation of the existing environmental conditions? | ☐ | ☐ | ☒ | ☐ |
| iii. Seismic-related ground failure, including liquefaction, caused in whole or in part by the project's exacerbation of the existing environmental conditions? | ☐ | ☐ | ☒ | ☐ |
| iv. Landslides, caused in whole or in part by the project's exacerbation of the existing environmental conditions? | ☐ | ☐ | ☐ | ☒ |
| b. Result in substantial soil erosion or the loss of topsoil? | ☐ | ☐ | ☒ | ☐ |
| c. Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse, caused in whole or in part by the project's exacerbation of the existing environmental conditions? | ☐ | ☐ | ☒ | ☐ |

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property caused in whole or in part by the project's exacerbation of the existing environmental conditions?	☐	☐	☒	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒

The following analysis is based on the Preliminary Geotechnical Assessment (Geotechnical Assessment) prepared for the Project by Geotechnologies, Inc., dated November 21, 2017. All specific information on geologic and soils conditions in the discussion below is from this report unless otherwise noted. This report is included as Appendix IS-3 of this Initial Study.

In 2015, the California Supreme Court in California Building Industry Association v. Bay Area Air Quality Management District (CBIA v. BAAQMD), held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of the project. The revised thresholds are intended to comply with this decision. Specifically, the decision held that an impact from the existing environment to the project, including future users and/or residents, is not an impact for purposes of CEQA. However, if the project, including future users and residents, exacerbates existing conditions that already exist, that impact must be assessed, including how it might affect future users and/or residents of the project. Thus, in accordance with Appendix G of the State CEQA Guidelines and the CBIA v. BAAQMD decision, the project would have a significant impact related to geology and soils if it would result in any of the following impacts.

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, caused in whole or in part by the project's exacerbation of the existing environmental conditions? Refer to Division of Mines and Geology Special Publication 42.

Less Than Significant Impact. Fault rupture occurs when movement on a fault deep within the earth breaks through to the surface. Based on criteria established by the California Geological Survey, faults can be classified as active, potentially active, or inactive. Active faults are those having historically produced earthquakes or shown evidence of movement within the past 11,000 years (during the Holocene Epoch). Potentially active faults have demonstrated displacement within the last

1.6 million years (during the Pleistocene Epoch) while not displacing Holocene Strata. Inactive faults do not exhibit displacement younger than 1.6 million years before the present. In addition, there are buried thrust faults, which are faults with no surface exposure. Due to their buried nature, the existence of buried thrust faults is usually not known until they produce an earthquake.

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

Review of the earthquake fault zone maps within Los Angeles indicates that the Project Site is not located within an Alquist-Priolo Fault Zone Map or within a City-designated Fault Rupture Study Area.²⁸ The closest Alquist-Priolo Earthquake Fault Zone is the Hollywood Fault/Raymond Fault Zone, which is located approximately 5.7 miles to the north of the Project Site.²⁹ Therefore, the potential for surface rupture due to faulting occurring beneath the Project Site is considered low. Moreover, the Project would not exacerbate existing fault rupture conditions. Therefore, impacts associated with surface rupture from a known earthquake fault would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

ii) Strong seismic ground shaking caused in whole or in part by the project's exacerbation of the existing environmental conditions?

Less Than Significant Impact. The Project Site is located within the seismically active region of Southern California and would potentially be subject to strong ground motion if a moderate to strong earthquake occurs on a local or regional fault. The effects of seismic ground shaking at the Project Site and in the Project area would not be exacerbated by the Project because the Project would not involve mining operations, deep excavation into the earth, or boring of large areas creating unstable seismic conditions that would exacerbate ground shaking. Furthermore, as discussed above, the Project Site is not located within an Alquist-Priolo Fault Zone. In addition, as discussed in the Geotechnical Assessment, the closest mapped nearby fault (an unnamed fault) is an east-west trending fault located approximately 1.2 miles north of the Project Site. However, as discussed further in the Geotechnical Assessment, this designated fault could not be corroborated or verified and thus need not be considered in the design of the Project. Regardless, no active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site. Therefore, impacts associated with seismic ground shaking would be less than significant, and no mitigation measures are required.

²⁸ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report, <http://zimas.lacity.org/>, accessed January 5, 2018.

²⁹ Geotechnologies, Inc., Preliminary Geotechnical Assessment, November 21, 2017, p. 5. See Appendix IS-3 of this Initial Study.

The following discussion about building and seismic codes is provided for informational purposes. Engineering design solutions reduce the substantial risk of exposing people or structures to loss or injury. As discussed in detail below, state and local code requirements ensure that buildings are designed and constructed in a manner that, although the buildings may sustain damage during a major earthquake, would reduce the substantial risk that buildings would collapse. The Geotechnical Assessment contains preliminary recommendations for the type of engineering practices that would be used. Additionally, a final design-level geotechnical report must be prepared by the Project Applicant and reviewed to the satisfaction of the Department of Building and Safety before the issuance of grading permits. The final recommendations from that report will be enforced for the construction of the Project. Based on the Geotechnical Assessment, the Project Site is suitable for development, and the Project may be constructed using standard, accepted, and proven engineering practices considering the seismic shaking potential and geologic conditions at the Project Site. As with other development projects in the Southern California region, the Project would comply with the Los Angeles Building Code (LABC), which incorporates current seismic design provisions of the 2016 California Building Code with City amendments. The 2016 California Building Code incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and maximize earthquake safety. The Los Angeles Department of Building and Safety is responsible for implementing the provisions of the LABC. The Project would also be required to comply with the plan review and permitting requirements of the Los Angeles Department of Building and Safety, including the recommendations provided in a final, site-specific geotechnical report. In addition, the state and City mandate compliance with numerous rules related to seismic safety, including the Alquist-Priolo Earthquake Fault Zoning Act, Seismic Safety Act, Seismic Hazards Mapping Act, the General Plan Safety Element, and the Los Angeles Building Code. Pursuant to those laws, the Project must demonstrate compliance with the applicable provisions of these safety requirements before permits can be issued for construction of the Project.

Based on the above, development of the Project would not exacerbate existing seismic conditions on the Project Site. Impacts associated with seismic ground shaking would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

iii) Seismic-related ground failure, including liquefaction, caused in whole or in part by the project's exacerbation of the existing environmental conditions?

Less Than Significant Impact. Liquefaction is a seismic phenomenon in which loose, saturated, granular soils behave similarly to a fluid when subjected to high-intensity ground shaking. Liquefaction occurs when three general conditions exist: shallow groundwater; low density, fine, clean sandy soils; and strong ground motion. Effects of liquefaction can include sand boils, settlement, and bearing capacity failures below structural foundations.

Neither the City of Los Angeles nor the State of California classifies the Project Site as part of a potentially liquefiable area.^{30,31} In addition, the historic-high groundwater level at the Project Site is approximately 170 feet below ground surface. However, as discussed in the Geotechnical Assessment, a recent environmental investigation conducted in 2016 observed groundwater at a depth of 81 feet below the ground surface.³² As discussed in the Geotechnical Assessment, based on other liquefaction analyses in the vicinity of the Project Site, the alluvial soils underlying the Project Site are typically not considered to be subject to liquefaction. It is therefore probable that the potential for liquefaction at the Project Site is likely low. Therefore, based on these considerations, the Project would not exacerbate existing environmental conditions and cause or accelerate geologic hazards related to liquefaction, which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. As such, impacts associated with liquefaction would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

iv) Landslides, caused in whole or in part by the project's exacerbation of the existing environmental conditions?

No Impact. Landslides generally occur in loosely consolidated, wet soil, and/or rocks on steep sloping terrain. The Project Site and surrounding area are fully developed and generally characterized by flat topography. In addition, the Project Site is not located in a landslide area as mapped by the state³³ or the City of Los Angeles.^{34,35} Development of the Project would not substantially alter the existing topography of the Project Site. Specifically, the Project Site would remain flat. Therefore, the Project would not exacerbate existing conditions that would result in the exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. As such, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. Development of the Project would require grading and excavation and other construction activities that have the potential to disturb existing soils and expose soils to rainfall and wind, thereby potentially resulting in soil erosion. However, construction activities would occur in accordance with erosion control requirements, including grading and dust control measures, imposed by the City pursuant to grading permit regulations. Specifically, Project construction would comply with the Los Angeles Building Code, which requires permits, plans, plan

³⁰ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report, <http://zimas.lacity.org/>, accessed January 5, 2018.

³¹ State of California, California Geological Survey, Seismic Hazard Zones. Los Angeles Quadrangle, March 25, 1999.

³² Fluctuations in the level of groundwater would be expected to occur over time due to variations in rainfall, temperature, and other factors.

³³ State of California, California Geological Survey, Seismic Hazard Zones. Los Angeles Quadrangle, March 25, 1999.

³⁴ Los Angeles General Plan Safety Element, November 1996, Exhibit C, Landslide Inventory & Hillside Areas, p. 51.

³⁵ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report, <http://zimas.lacity.org/>, accessed January 5, 2018.

checks, and inspections to ensure that the Project would reduce the sedimentation and erosion effects. In addition, the Project would require an erosion control plan to be approved by the Los Angeles Department of Building and Safety, as well as a Storm Water Pollution Prevention Plan pursuant to National Pollutant Discharge Elimination System permit requirements. As part of the Storm Water Pollution Prevention Plan, Best Management Practices would be implemented during construction to reduce sedimentation and erosion levels to the maximum extent possible. Regarding soil erosion during Project operations, the potential for erosion is low since the Project Site would be fully developed and no soils would be left exposed. Therefore, with compliance with applicable regulatory requirements, impacts regarding soil erosion or the loss of topsoil would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse, caused in whole or in part by the project's exacerbation of the existing environmental conditions?

Less Than Significant Impact. As discussed above, Project Site is not located near slopes or geologic features that would result in on- or off-site landsliding or lateral spreading. Additionally, as discussed in greater detail in Response to Checklist Question VI.a.iii above, based on the depth to groundwater, subsidence and liquefaction are unlikely at the Project Site. The Project would not exacerbate existing conditions since it would not cause a geologic unit or soil to become unstable. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

d) Be located on expansive soil, as defined in Table 18 1 B of the Uniform Building Code (1994), creating substantial risks to life or property caused in whole or in part by the project's exacerbation of the existing environmental conditions?

Less Than Significant Impact. Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. As discussed in the Geotechnical Evaluation, the Project Site is underlain with native alluvial soils that are typically dense or stiff and well consolidated, with expansion potential ranging from very low to low. Furthermore, construction of the Project would be required to comply with the California Building Code and supplemental requirements of the LAMC, as enforced by the City of Los Angeles. These requirements would include building foundation and other requirements appropriate to site-specific conditions that would be provided in accordance with the design level geotechnical investigation required by the City. Thus, the Project would not exacerbate existing environmental conditions with regard to expansive soil. Impacts with respect to expansive soils would be less than significant, and no mitigation measures are required.

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?

No Impact. The Project Site is located within a community served by existing wastewater infrastructure. The Project's wastewater demand would be accommodated by connections to the existing wastewater infrastructure. As such, the Project would not require the use of septic tanks or

alternative wastewater disposal systems. Therefore, the Project would have no impact related to the ability of soils to support septic tanks or alternative wastewater disposal systems. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Would the project:

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

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

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

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

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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VIII. HAZARDS AND HAZARDOUS MATERIALS.

Would the project:

- | | | | | |
|---|-------------------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? | ☐ | ☐ | ☒ | ☐ |
| b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? | ☒ | ☐ | ☐ | ☐ |
| c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? | ☐ | ☐ | ☒ | ☐ |
| d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment caused in whole or in part from the project's exacerbation of existing environmental conditions? | ☒ | ☐ | ☐ | ☐ |
| 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, caused in whole or in part from the project's exacerbation of existing environmental conditions? | ☐ | ☐ | ☒ | ☐ |

As discussed above, in 2015, the California Supreme Court in CBIA v. BAAQMD, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of the Project. The revised thresholds are intended to comply with

this decision. Specifically, the decision held that an impact from the existing environment to the Project, including future users and/or residents, is not an impact for purposes of CEQA. However, if the Project, including future users and residents, exacerbates existing conditions that already exist, that impact must be assessed, including how it might affect future users and/or residents of the Project. For example, if construction of the Project on a hazardous waste site will cause the potential dispersion of hazardous waste in the environment, the EIR should assess the impacts of that dispersion to the environment. Thus, in accordance with Appendix G of the State CEQA Guidelines and the CBIA v. BAAQMD decision, the Project would have a significant impact related to hazards and hazardous materials if it would result in any of the following impacts.

Would the project:

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

Less Than Significant Impact. The types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used during construction of commercial developments, including vehicle fuels, paints, oils, and transmission fluids. Similarly, the types and amounts of hazardous materials used during operation of the proposed commercial uses would be typical of such developments and would include cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products. All potentially hazardous materials to be used during construction and operation of the Project would be contained, stored, and used in accordance with manufacturers' instructions and handled in accordance with all applicable standards and regulations, including but not limited to, those set forth by the federal and State Occupational Safety and Health Acts. Such requirements include obtaining material safety data sheets from chemical manufacturers, making these data sheets available to employees, labeling chemical containers in the workplace, developing and maintaining a written hazard communication program, and developing and implementing programs to train employees about hazardous materials. Any associated risk would be adequately reduced to a less than significant level through compliance with these standards and regulations. Impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Potentially Significant Impact. Industrial operations have been conducted at the Project Site since 1906. The existing site buildings were constructed in the 1920s, prior to the enactment of laws preventing the use of asbestos-containing materials (ACM), polychlorinated biphenyls (PCBs) and lead based paint (LBP). Therefore, these materials may be present on the Project Site. A Phase I ESA will be prepared for the Project Site, which will evaluate whether the Project Site contains conditions that may result in a significant hazard to the public or the environment. Thus, further analysis of potential uses associated with release of hazardous materials will be provided in the EIR.

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

Less Than Significant Impact. There are no schools located within a 0.25-mile radius of the Project Site. Metropolitan High School is located approximately 0.35 mile west of the Project Site at 727 Wilson Street and is separated from the Project Site by numerous structures and roadways. In addition, trucks that would be used to dispose of any hazardous materials from the Project Site would not be expected to pass by Metropolitan High School. As such, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within 0.25 mile of an existing or proposed school. Impacts would be less than significant and no mitigation measures would be required. No further evaluation of this topic in the EIR is required.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment, caused in whole or in part from the project's exacerbation of existing environmental conditions?

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

Based on a preliminary review of the databases discussed above, the Project Site appears to be listed as a Permitted UST location. The Phase I ESA to be prepared for the Project will conduct a more detailed database search and investigation of property records and historical uses. Given the age of the buildings on-site and previous industrial uses, it is possible that the Project Site is listed on a hazardous materials site pursuant to Government Code Section 65962.5. Further analysis of this issue will be provided in the EIR.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

No Impact. The Project Site is not located within an area subject to an airport land use plan or within 2 miles of an airport. The closest airport is the Hawthorne Municipal Airport, located approximately 9.3 miles southwest of the Project Site. Given the distance between the Project Site and the Hawthorne Municipal Airport, the Project would not have the potential to result in a safety hazard. Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required. With regard to potential impacts to air traffic, see Checklist Question XVI.c, Transportation/Circulation, below.

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

No Impact. The Project Site is not located within the vicinity of a private airstrip. The nearest private airstrip is the Los Alamitos Army Airfield, located approximately 19 miles southeast of the Project Site. Given the distance between the Project Site and the Los Alamitos Army Airfield, the Project would not have the potential to result in a safety hazard. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. According to the Safety Element of the City of Los Angeles General Plan, the nearest disaster routes to the Project Site are the Hollywood Freeway (US-101), the Santa Monica Freeway (I-10), and the Golden State Freeway (I-5), which are all accessible within less than 1 mile of the Project Site. Alameda Street is also a designated disaster route located approximately 0.5 mile east of the Project Site.³⁶ While it is expected that the majority of construction activities for the Project would be confined to the Project Site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access.

Operation of the Project would generate traffic in the Project vicinity and would result in some modifications to site access. However, the Project would comply with LAFD access requirements and would not impede emergency access within the Project vicinity. Furthermore, as discussed above, the closest disaster routes include Alameda Street, US-101, I-10, and I-5, which are all less than 1 mile from the Project Site. The Project would not cause an impediment along the City's designated disaster routes or impair the implementation of the City's emergency response plan. Impacts related to the implementation of the City's emergency response plan would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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, caused in whole or in part from the project's exacerbation of existing environmental conditions?

Less Than Significant Impact. There are no wildlands located in the vicinity of the Project Site. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone³⁷ or within a City-designated fire buffer zone.³⁸ Therefore, the Project would not exacerbate conditions that would subject people or structures to a significant risk of loss, injury, or death as a result of

³⁶ Los Angeles General Plan Safety Element, November 1996, Exhibit H, Critical Facilities and Lifeline Systems, p. 61.

³⁷ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed January 8, 2018. The Very High Fire Hazard Severity Zone was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone" shown on Exhibit D of the Los Angeles General Plan Safety Element.

³⁸ City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit D, p. 53.

exposure to wildland fires. Furthermore, the Project would be developed in accordance with LAMC requirements pertaining to fire safety. Specifically, Section 57.106.5.2 of the LAMC provides that the Fire Chief has the authority to require drawings, plans, and sketches as necessary to identify access points, fire suppression devices and systems, utility controls, and stairwells; Section 57.118 of the LAMC establishes LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects; and Section 57.507.3.1 establishes fire water flow standards. Additionally, the proposed uses would not create a fire hazard that has the potential to exacerbate the current environmental condition relative to wildfires. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required..

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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IX. 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 of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)? | ☒ | ☐ | ☐ | ☐ |
| 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 through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site? | ☒ | ☐ | ☐ | ☐ |
| 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? | ☐ | ☐ | ☐ | ☒ |

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

Would the project:

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

Potentially Significant Impact. Construction activities associated with the Project would have the potential to result in the conveyance of pollutants into the adjacent Los Angeles River and municipal storm drains, particularly during precipitation events. In addition, potential changes in on-site drainage patterns resulting from Project operation and the introduction of new land uses could affect the quality and quantity of storm water runoff. Given the Project Site's proximity to the Los Angeles River, further analysis of this issue will be included in the EIR.

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

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

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Potentially Significant Impact. The Project Site is currently developed with commercial and light industrial buildings and is adjacent to a concrete-lined portion of the Los Angeles River. No streams or rivers cross the Project Site. The Project would involve the demolition of the existing uses, construction of new buildings, and the installation of new landscaped areas, which would have the potential to alter the existing drainage pattern of the Project Site. Therefore, further analysis of this issue will be included in the EIR.

d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

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

e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

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

f) Otherwise substantially degrade water quality?

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

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

No Impact. The Project Site is not located within a 100-year flood hazard area as mapped by the Federal Emergency Management Agency (FEMA) or by the City of Los Angeles.^{39,40} The Project Site is located in Zone X (Other Flood Areas), which are areas of 0.2 percent chance flood; areas of 1 percent annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 1 percent annual chance flood. In addition, the Project does not propose residential uses. Thus, the Project would not place housing within a 100-year flood hazard area. No impacts would occur, and no mitigation would be required. No further analysis of this topic in an EIR is required.

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

No Impact. As discussed above in Response to Checklist Question IX.g, the Project Site is not located within a designated 100-year flood hazard area. Thus, the Project would not place structures that would impede or redirect flood flows within a 100-year flood hazard area. No impacts would occur, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Less Than Significant Impact. As discussed above, the Project Site is not located within a designated 100-year flood plain as mapped by the Federal Emergency Management Agency (FEMA)

³⁹ Federal Emergency Management Agency, Flood Insurance Rate Map, Panel Number 06037C1636F, effective September 26, 2008.

⁴⁰ City of Los Angeles, Safety Element of the Los Angeles City General Plan, Exhibit F, November 26, 1996, p. 57.

or by the City of Los Angeles. In addition, the Safety Element of the City of Los Angeles General Plan does not map the Project Site as being located within a flood control basin.⁴¹ However according to the “Los Angeles County Drainage Area Review Draft Feasibility Report” dated December 1991 by the U.S. Army Corps of Engineers, the Project Site may be subject to a 100-year flood due to a limitation in the capacity of the Los Angeles River channel. In addition, according to the Safety Element of the Los Angeles City General Plan, the Project Site within a potential inundation area in the event of failure of the Los Angeles River flood control system.⁴² The nearest levee is along the Los Angeles River located approximately 250 feet east of the Project Site. The U.S. Army Corps of Engineers operates and maintains the 22.5-mile stretch of the Los Angeles River between Lankershim Boulevard in Hollywood and Stuart and Grey Road in Downey, which includes the portion adjacent to the Project Site. Their maintenance activities include inspection and cleaning of the channel walls and removing vegetation growing in cracks and joints. In addition, the U.S. Army Corps of Engineers has directed repair of damaged embankments upstream of the Project Site and has installed barriers for those portions of the channel that were identified as at greatest risk of flood waters during the 2015/2016 El Nino storm season. With continued inspection, maintenance and flood control activities, the potential for substantial adverse impacts related to inundation at the Project Site due to proximity to the Los Angeles River would be less than significant. In addition, to further address the potential for flooding on the Project Site, the proposed buildings would be set on a podium. Specifically, the buildings’ finished floor would be raised approximately two feet above the existing grade along Bay Street and approximately four feet above existing grade along Sacramento Street. Therefore, the Project would not expose people or structures to a significant risk of loss, injury or death involving flooding. Impact would be less than significant in this regard and no further evaluation of this topic in an EIR is required.

j) Inundation by seiche, tsunami, or mudflow?

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

The Project Site is located approximately 14 miles east of the Pacific Ocean. In addition, the Safety Element of the General Plan does not map the Project Site as being located within an area potentially affected by a tsunami.⁴³ The Los Angeles River is located approximately 250 feet to the east, but includes a sunken concrete lined channel and there are no major water-retaining structures located immediately up-gradient from the Project Site. Thus, inundation as a result of seiche is considered unlikely. As discussed above, the Project Site and surrounding area are fully developed and generally characterized by flat topography. Given the fact that the Project Site is not mapped by either the State or the City as being located in an area prone to landslides, the potential for the Project Site to be inundated by mudflows is low. Therefore, no seiche, tsunami, or mudflow events would be

⁴¹ City of Los Angeles, Safety Element of the Los Angeles City General Plan, Exhibit G, November 26, 1996, p. 59.

⁴² City of Los Angeles, Safety Element of the Los Angeles City General Plan, Exhibit G, November 26, 1996, p. 59.

⁴³ City of Los Angeles, Safety Element of the Los Angeles City General Plan, Exhibit G, November 26, 1996, p. 59.

expected to impact the Project Site. Impacts would be less than significant and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
X. LAND USE AND PLANNING. Would the project:				
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 any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒

Would the project:

a) Physically divide an established community?

Less Than Significant Impact. As discussed in Part A, Project Description, of this Initial Study, the Project Site is located in a highly urbanized area that is developed with a mix of light industrial, heavy industrial, warehouse, and commercial uses. Adjacent uses include textile and import businesses to the north, a surface parking lot to the east, knitting mills and fabric warehouses to the south, and a vehicle towing facility to the west. All proposed development would occur within the boundaries of the Project Site as it currently exists and the Project does not propose a freeway or other large infrastructure that would divide a community. Therefore, the Project would not physically divide an established community. Impacts related to the physical division of an established community would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

Potentially Significant Impact. As discussed in Part A, Project Description of this Initial Study, the Project requires discretionary approvals, including, but not limited to, a Vesting Zone and Height District Change, a Vesting Tentative Tract map, Site Plan Review, a Master Conditional Use Permit, and a Zoning Administrator's Adjustment. Therefore, the EIR will provide further analysis of whether the Project conflicts with applicable land use plans, policies, and regulations that were adopted for the purpose of avoiding or mitigating an environmental effect.

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

No Impact. The Project Site is located in an urbanized area and is currently occupied by creative office, office, and light industrial uses. As discussed above in Checklist Question IV, Biological Resources, the Project Site does not include any trees or mature landscaping that support any habitat or natural community. As discussed above in Checklist Question IV, Biological Resources, the Project Site is located west of the Los Angeles River and is within the RIO District. Development of the Proposed Project would comply with the applicable development standards and guidelines for the RIO District, including landscaping guidelines, which would ensure that the Proposed Project does not conflict with a conservation plan. No Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site.^{44, 45} Thus, the Project would not conflict with the provisions of an adopted habitat conservation plan or natural community conservation plan. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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XI. MINERAL RESOURCES. Would the project:

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|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| 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? | ☐ | ☐ | ☐ | ☒ |

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?

No Impact. No mineral extraction operations currently occur on the Project Site. The Project Site is located within an urbanized area and has been previously disturbed by development. As such, the potential for mineral resource recovery to occur on-site is low. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present, or within a mineral producing area as classified by the California Geologic Survey.^{46,47}

⁴⁴ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed February 7, 2018.

⁴⁵ California Department of Fish and Wildlife, California Regional Conservation Plans, July 2017, <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline>, accessed February 7, 2018.

⁴⁶ City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995. Figure GS-1.

The Project Site is also not located within a City-designated oil field or oil drilling area.⁴⁸ Therefore, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. No mineral extraction operations currently occur on the Project Site. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present, or within a mineral producing area as classified by the California Geologic Survey.^{49,50,51} The Project Site is also not located within a City-designated oil field or oil drilling area.^{52, 53} Therefore, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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XII. NOISE. Would the project result in:

a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☒	☐	☐	☐
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☒	☐	☐	☐
c. A substantial permanent increase in ambient noise levels in the project vicinity 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?	☒	☐	☐	☐

⁴⁷ State of California Department of Conservation, California Geologic Survey, Aggregate Sustainability in California, 2012.

⁴⁸ City of Los Angeles, Safety Element of the Los Angeles City General Plan, Exhibit E, November 26, 1996, p. 55.

⁴⁹ City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995. Figure GS-1.

⁵⁰ State of California Department of Conservation, California Geologic Survey, Aggregate Sustainability in California, 2012.

⁵¹ City of Los Angeles, Conservation Element of the Los Angeles City General Plan, January 2001, Exhibit A, p. 86.

⁵² City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit E, p. 55.

⁵³ California Division of Oil, Gas and Geothermal Resources, 2017, Online Well Finder, <http://maps.conservation.ca.gov/doggr/#close>, accessed January 5, 2018.

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

Would the project result in:

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

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

b) Exposure of persons to, or generation of, excessive groundborne vibration or groundborne noise levels?

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

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

Potentially Significant Impact. As discussed in Response to Checklist Question XII.a, above, human activity associated with the Project would have the potential to increase ambient noise levels above existing levels. Therefore, further evaluation of this topic will be provided in the EIR.

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

Potentially Significant Impact. As discussed above in Response to Checklist Questions XII.a and XII.b, construction activities associated with the Project would have the potential to temporarily or periodically increase ambient noise levels above existing levels. Therefore, further evaluation of this topic will be provided in the EIR.

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

No Impact. The Project Site is not located within an airport land use plan or within 2 miles of an airport. The closest airport to the Project Site is the Hawthorne Municipal Airport, located approximately 9.3 miles southwest of the Project Site. Given the distance between the Project Site and the Hawthorne Municipal Airport, the Project would not expose people residing or working in the Project area to excessive noise levels. Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. The Project Site is not located within the vicinity of a private airstrip. The nearest private airstrip is the Los Alamitos Army Airfield, located approximately 19 miles southeast of the Project Site. Given the distance between the Project Site and the Los Alamitos Army Airfield, the Project would not expose people residing or working in the Project area to excessive noise levels. Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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XIII. POPULATION AND HOUSING. Would the project:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | ☐ | ☐ | ☒ | ☐ |
| 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? | ☐ | ☐ | ☐ | ☒ |

Would the project:

a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant Impact. The Project would result in the construction of creative office, retail, restaurant, and event and meeting space uses. Since the Project does not propose a housing component, it would not directly induce a new residential population that would contribute to population growth in the vicinity of the Project Site. Additionally, while construction of the Project would create temporary construction-related jobs, the work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, Project-related construction workers would not be anticipated to relocate their household's place of residence as a consequence of working on the Project and, therefore, no new permanent residents would be generated during construction of the Project.

With regards to operation of the Project, while the employment opportunities generated by the proposed creative office, retail, and restaurant uses may be filled to some extent by employees already residing in the vicinity of the Project Site, it is also possible that some of the jobs created by the proposed uses would be filled by persons moving into the surrounding area, and housing demand associated with the Project could increase. However, it is anticipated that some of this demand would be filled by then-existing vacancies in the housing market, and some from other new units in nearby developments. Therefore, given that the Project would not directly contribute to population growth in the Project area and as some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site, the potential growth associated with Project employees who may relocate their place of residence would not be substantial. As such, the Project would not result in a notable increase in demand for new housing, and any new demand, should it occur, would be minor in the context of forecasted growth for the City of Los Angeles. Further, as the Project would be located in a highly developed area with an established network of roads and other urban infrastructure, the Project would not require the extension of such infrastructure in a manner that would indirectly induce substantial population growth.

Based on the above, the Project would not induce substantial population or housing growth. Impacts would be less than significant and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

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

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

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

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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XIV. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

a. Fire protection?	☒	☐	☐	☐
b. Police protection?	☒	☐	☐	☐
c. Schools?	☐	☐	☒	☐
d. Parks?	☐	☐	☒	☐
e. Other public facilities?	☐	☐	☒	☐

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

a) Fire protection?

Potentially Significant Impact. The LAFD provides fire protection and emergency medical services for the Project Site. The Project would increase the building square footage on-site and introduce a high-rise structure, which has the potential to result in an increased demand for fire protection services and associated facilities. Therefore, further analysis of this issue will be included in the EIR.

b) Police protection?

Potentially Significant Impact. Police protection for the Project Site is provided by the City of Los Angeles Police Department. The closest police station to the Project Site is the Central Community Police Station located at 251 E. 6th Street, approximately 1.5 mile northwest of the Project Site. The Project would introduce new creative office, retail, restaurant, and event and meeting space uses to the Project Site and, as a result, would increase the daytime population in the service area. This could result in the need for additional police services and associated facilities. Therefore, further analysis of this issue will be included in the EIR.

c) Schools?

Less Than Significant Impact. The Project Site is located within the boundaries of the Los Angeles Unified School District (LAUSD). LAUSD is divided into six local districts.⁵⁴ The Project Site is located in Local District–East.⁵⁵ As previously discussed, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in a direct increase in the number of students within the service area of LAUSD. In addition, the number of students that may be indirectly generated by the Project that could attend LAUSD schools serving the Project Site would not be anticipated to be substantial because not all employees of the Project are likely to reside in the vicinity of the Project Site. Furthermore, pursuant to Senate Bill 50, the Project Applicant would be required to pay development fees for schools to LAUSD prior to the issuance of building permits. Pursuant to Government Code Section 65995, the payment of these fees is considered mitigation of Project-related school impacts. Thus, the Project would not result in the need for new or altered school facilities. Therefore, impacts would be less than significant, and no mitigation measures are required. No further analysis of this issue in an EIR is required.

d) Parks?

Less Than Significant Impact. Parks and recreational facilities in the vicinity of the Project Site are primarily operated and maintained by the Los Angeles Department of Recreation and Parks. Nearby parks and recreational facilities within an approximate 2-mile radius of the Project Site include: Arts District Park (1.0 mile north); Boyle Heights Sports Center (1.3 miles east); Gladys Park (1.3 miles northwest); Hollenbeck Park & Recreation Center (1.4 miles northeast); Pecan Pool & Recreation Center (1.7 miles north); Costello Pool & Recreation Center (1.7 miles southeast); Roosevelt Pool (1.8 miles northeast); Ross Valencia Community Park (1.8 miles northeast); Ramon Garcia Recreation Center (2.0 miles east); and Central Park Recreation Center (2.0 miles southwest).

As previously discussed, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in on-site residents who would utilize nearby parks and/or recreational facilities. While it is possible that some of the new employees that could be generated by the Project may utilize local parks and recreational facilities, this increased demand would be negligible due to the amount of time it would take for employees to access off-site local parks which are at least 1 mile away. Additionally, the new employment opportunities that would be generated by the Project may be filled, in part, by employees already residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities. Therefore, while the Project's employment opportunities could have the potential to indirectly increase the population of the Central City North Community Plan area, new demand for public parks and recreational facilities associated with Project development would be limited. Therefore, impacts on parks would be less than significant, and no mitigation measures are required. No further analysis of this issue in an EIR is required.

⁵⁴ Los Angeles Unified School District, Board of Education Districts Maps 2015-2016, <http://achieve.lausd.net/Page/8652>, accessed January 5, 2018.

⁵⁵ Los Angeles Unified School District, Board of Education Local District—East Map, July 2015.

e) Other public facilities?

Less Than Significant Impact. Other public facilities provided to the Project Site include library services and use of public roadways.

The Los Angeles Public Library (LAPL) provides library services to the City of Los Angeles through its Central Library, eight regional branch libraries, and 64 neighborhood branch libraries, as well as through Web-based resources.⁵⁶ The Project area is served by existing LAPL facilities including the Benjamin Franklin Branch Library (1.8 miles northeast), the Little Tokyo Branch Library (1.8 miles northwest), and the Los Angeles Central Library (2.4 miles northwest). As previously discussed, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in a direct increase in the number of residents within the service population of the local LAPL facilities. In addition, Project employees would have internet access to LAPL and other web-based resources, decreasing the demand on library facilities. Furthermore, as Project employees would be more likely to use library facilities near their homes during non-work hours and given that some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site, Project employees and the potential indirect population generation that could be attributable to those employees would generate minimal demand for library services. Therefore, impacts on library facilities would be less than significant, and no mitigation measures are required. No further analysis of this issue in an EIR is required.

During construction and operation of the Project, roads would continue to be utilized to access the Project Site. As discussed below in Checklist Question XVI.a, further analysis of the potential for the Project to result in a significant increase in the number of vehicle trips on local roadways will be evaluated in the transportation/traffic section of the EIR. Any necessary improvements to local roadways associated with development of the Project will also be identified in the transportation/traffic section of the EIR.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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XV. RECREATION.

- a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

☐	☐	☒	☐
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⁵⁶ Los Angeles Public Library, Library Directory.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?

Less Than Significant Impact. As described above in Response to Checklist Question XIV.d, several public parks and recreational facilities are located in the vicinity of the Project Site. However, the Project does not propose the development of residential uses that would create a demand on nearby parks and/or recreational facilities. While it is possible that some of the Project's new employees may utilize local parks and recreational facilities, this increased demand would be negligible due to the amount of time it would take for employees to access off-site local parks and recreational facilities. Furthermore, the new employment opportunities that would be generated by the Project may be filled, in part, by employees already residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities. Therefore, while the Project's employment opportunities could have the potential to indirectly increase the population of the Central City North Community Plan area, new demand for public parks and recreational facilities associated with Project development would be limited.

Based on the above, the Project would not substantially increase the demand for off-site public parks and recreational facilities, such that substantial physical deterioration of those facilities would occur or be accelerated. The impact on parks and recreational facilities would be less than significant and mitigation measures would not be required. No further evaluation of this topic in an EIR is required.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

No Impact. The Project would not include the development of recreational facilities or require the expansion of recreational facilities, as discussed above in Response to Checklist Question XIV.d. Therefore, no impact would occur and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. TRANSPORTATION/TRAFFIC. Would the project:				
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☒	☐	☐	☐
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☒	☐	☐	☐
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 uses (e.g., farm equipment)?	☐	☐	☐	☒
e. Result in inadequate emergency access?	☐	☐	☒	☐
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☒	☐	☐	☐

Would the project:

a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Potentially Significant Impact. The Project proposes development that has the potential to result in an increase in daily and peak-hour traffic within the vicinity of the Project Site. In addition, construction of the Project has the potential to affect the transportation system through the hauling of excavated materials and debris, the transport of construction equipment, the delivery of construction materials, and travel by construction workers to and from the Project Site. Once construction is

completed, the Project's employees and visitors would generate vehicle and transit trips throughout the day. The resulting increase in the use of the area's transportation facilities could affect the capacity of the roadway and transit system. Therefore, further analysis of this issue will be provided in the EIR.

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

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

c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Less Than Significant Impact. The Project proposes a new 140.5-foot tall, 8-story high-rise building and two two-story buildings. These building heights are less than 200 feet in height and thus would not be subject to FAA noticing requirements. Additionally, the Project does not propose any uses that would increase the frequency of air traffic. Impacts would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

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

e) Result in inadequate emergency access?

Less Than Significant Impact. While it is expected that the majority of construction activities for the Project would be confined to the Project Site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. In addition, the Project Site is located at the eastern termini of Bay Street and Sacramento Street and there is no through traffic on these streets. Thus, the Project does not have the potential to restrict access of emergency vehicles to any locations other than the uses located at the termini of Bay Street and Sacramento Street. Furthermore, appropriate construction traffic control measures (e.g. detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent right-of-ways. Additionally, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Since emergency access to the Project Site would remain unobstructed during construction of the Project, impacts related to emergency access would be less than significant.

Operation of the Project would generate traffic in the Project vicinity and would result in some modifications to site access. However, the Project's driveways and internal circulation would be designed to incorporate all City Building Code, Fire Code, and LADOT requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in Section 57.118 of the LAMC, and which are required prior to the issuance of a building permit. Therefore, the Project would not result in inadequate emergency access. Impacts would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

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

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

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

- | | | | | |
|--|-------------------------------------|--------------------------|--------------------------|--------------------------|
| i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or | ☒ | ☐ | ☐ | ☐ |
| ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. | ☒ | ☐ | ☐ | ☐ |

Would the project:

a.i) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?

a.ii) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Potentially Significant Impact. Approved by Governor Jerry Brown on September 25, 2014, Assembly Bill 52 establishes a formal process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in Public Resources Code Section 21074, as part of CEQA. Effective July 1, 2015, AB 52 applies to projects that file a Notice of Preparation or Notice of Negative Declaration/Mitigated Negative Declaration on or after July 1, 2015. As specified in Assembly Bill 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation.

The Project would require excavations up to 42 feet below grade. Therefore, the potential exists for the Project to significantly impact a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe. In compliance with Assembly Bill 52, the City will notify all applicable tribes and will participate in any requested consultations. Further analysis of this topic will be provided in the EIR.

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
g. Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☒	☐

The following analysis is based in part on the Utility Infrastructure Technical Report: Wastewater (Wastewater Report) prepared for the Project KPFF Consulting Engineers, dated March 13, 2018. This report is included as Appendix IS-4 of this Initial Study.

Would the project:

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

Less Than Significant Impact. Wastewater collection and treatment services within the Project vicinity are provided by the City of Los Angeles Department of Public Works (LADPW). Wastewater generated during Project operation would be collected and discharged evenly into the existing 8-inch sewer main in Bay Street and 8-inch sewer main in Sacramento Street and conveyed to the Hyperion Treatment Plant (HTP) located in the City of El Segundo.⁵⁷ The HTP is part of the Hyperion Treatment System, which also includes the Tillman Water Reclamation Plant (TWRP), and the Los Angeles–Glendale Water Reclamation Plant (LAGWRP). The treatment capacity of the entire Hyperion Service Area is approximately 550 million gallons per day (consisting of 450 million gallons per day at the HTP, 80 million gallons per day at TWRP Plant, and 20 million gallons per day at LAGWRP).⁵⁸ The HTP is designed to treat approximately 450 million gallons per day of wastewater for full secondary treatment and currently treats approximately 275 million gallons per day.⁵⁹ As such, the HTP is currently operating at approximately 61 percent of its capacity, with a remaining available capacity of approximately 175 million gallons per day.

Incoming wastewater to the treatment plant initially passes through screens and basins to remove coarse debris and grit. This is followed by primary treatment, which is a physical separation process where heavy solids settle to the bottom of tanks while oil and grease float to the top. These solids, called sludge, are collected, treated, and recycled. The portion of water that remains, called primary effluent, is treated through secondary treatment using a natural, biological approach. Living micro-organisms are added to the primary effluent to consume organic pollutants. These micro-organisms are later harvested and removed as sludge.⁶⁰ Treated water from the HTP is discharged

⁵⁷ Utility Infrastructure Technical Report: Wastewater, KPFF Consulting Engineers, January 16, 2018. See Appendix IS-4 of this Initial Study.

⁵⁸ LASAN, Wastewater System Fact Sheet.

⁵⁹ LASAN, Hyperion Water Reclamation Plant, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=grj40dmqj_1780&_afLoop=3950078628628745#!, accessed January 11, 2018.

⁶⁰ LASAN, Hyperion Water Reclamation Plant, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=grj40dmqj_1780&_afLoop=3950078628628745#!, accessed January 11, 2018.

through an outfall pipe 5 miles into the Santa Monica Bay and Pacific Ocean.⁶¹ The discharge from the HTP into Santa Monica Bay is regulated by the Hyperion Water Reclamation Plant's National Pollutant Discharge Elimination System (NPDES) Permit issued under the Clean Water Act and is required to meet the Regional Water Quality Control Board's (RWQCB) requirements for a recreational beneficial use.⁶² Accordingly, the HTP's effluent that is released to Santa Monica Bay is continually monitored to ensure that it meets or exceeds prescribed water quality standards. The City's Environmental Monitoring Division also monitors flows into the Santa Monica Bay.⁶³

The wastewater generated by the Project would be typical of office, retail, restaurant, and event and meeting space uses. No industrial discharge into the wastewater system would occur. As the HTP is in compliance with the state's wastewater treatment requirements, the Project would not exceed the wastewater treatment requirements of the RWQCB. Therefore, impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Potentially Significant Impact (Water)/Less Than Significant Impact (Wastewater). Water and wastewater systems consist of two components, the source of the water supply or place of sewage treatment, and the conveyance systems (i.e., distribution lines and mains) that link the location of these facilities to an individual development site. Given the Project's increase in the amount of developed floor area on the Project Site and the potential corresponding increase in water demand, further analysis of the Project's water demand and associated demand on the water infrastructure serving the Project Site will be provided in the EIR.

With regard to wastewater, wastewater generated by the Project would be conveyed by the existing wastewater conveyance systems for treatment at the HTP. As described above, the Hyperion Treatment Plant has a capacity of 450 mgd. The HTP currently processes an average of 275 mgd, and therefore has an available capacity of approximately 175 mgd.⁶⁴ As shown in Table B-1 on page B-49, based on sewage generation factors established by LADPW Bureau of Engineering, the Project would generate a net of approximately 64,888 gallons of wastewater per day, or approximately 0.065 mgd, upon completion. The Project's average daily wastewater flow of 0.065 million gallons per day would represent approximately 0.04 percent of the current 175 million gallons per day available

⁶¹ California Regional Water Quality Control Board, Los Angeles Region, Order No. R4-2010-0200, NPDES No. CA0109991, Waste Discharge Requirements and National Pollutant Discharge Elimination System Permit for the City of Los Angeles, Hyperion Treatment Plant Discharge to the Pacific Ocean.

⁶² California Regional Water Quality Control Board, Los Angeles Region, Order No. R4-2010-0200, NPDES No. CA0109991, Waste Discharge Requirements and National Pollutant Discharge Elimination System Permit for the City of Los Angeles, Hyperion Treatment Plant Discharge to the Pacific Ocean.

⁶³ LASAN, Environmental Monitoring, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-wp-ec-em?_adf.ctrl-state=xsm2kqwx_131&_afLoop=21105064772207683#!, accessed January 11, 2018.

⁶⁴ LASAN, Hyperion Water Reclamation Plant, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=grj40dmqj_1780&_afLoop=3950078628628745#!, accessed January 11, 2018.

Table B-1
Estimated Project Wastewater Generation

Land Use	No. of Units/ Floor Area	Wastewater Generation Factor (gpd/unit)	Total Wastewater Generation (gpd)
Existing			
Office	7,106 sf	0.12	853
Light Industrial	16,222 sf	0.05	811
Creative Office	16,000 sf	0.12	1,920
Total Existing			3,584
Proposed			
Creative Office	202,954 sf	0.12	24,354
Auditorium	216 seats ^a	3	648
Restaurant: Full Service Indoor	1,067 seats ^a	30	32,010
Restaurant: Full Service Outdoor	382 seats ^a	30	11,460
Total Proposed			68,472
Less Existing to be Removed			(3,584)
Net Wastewater Generation (Proposed – Existing)			64,888
<i>sf = square feet</i> ^a Assumed 15 square feet per person to estimate existing seat count. Source: KPFF Consulting Engineers, 2018.			

capacity of the HTP.⁶⁵ Therefore, Project-generated wastewater would be accommodated by the existing capacity of the HTP.

Sewer service for the Project would be provided utilizing new or existing on-site sewer connections to the existing sewer main adjacent to the Project Site. Installation of wastewater infrastructure would be limited to on-site wastewater distribution and minor off-site work associated with connections to the public main. Although no upgrades to the public main are anticipated, minor off-site work is required to connect to the public main. Therefore, a construction management plan would be implemented to reduce any temporary pedestrian and traffic impacts during construction, including maintaining two lanes of travel and ensuring safe and emergency vehicle access. Project-related sanitary sewer connections and on-site infrastructure would be designed and constructed in accordance with applicable City and California Plumbing Code standards. Based on the Sewer Capacity Availability Request submitted as part of the Wastewater Report, the existing sanitary sewer

⁶⁵ Utility Infrastructure Technical Report: Wastewater, KPFF Consulting Engineers, January 16, 2018. See Appendix IS-4 of this Initial Study.

lines in the vicinity of the Project Site (i.e., Bay Street and Sacramento Street) would have adequate capacity to accommodate the Project.⁶⁶

Based on the above, the existing wastewater infrastructure is anticipated to have adequate capacity to serve the Project. Thus, impacts to wastewater treatment facilities would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Potentially Significant Impact. As discussed above in Response to Checklist Question IX.a., potential changes in on-site drainage patterns resulting from Project operation and the introduction of new land uses could affect the quantity of storm water runoff. Further analysis of this issue will be included in the EIR.

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

Potentially Significant Impact. LADWP supplies water to the Project Site. The Project would increase the demand for water provided by LADWP. Therefore, further analysis of this issue in an EIR will be provided.

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?

Less Than Significant Impact. As discussed above in Response to Checklist Question No. XVIII.b, wastewater generated during Project operation would be collected and discharged into the existing sewer main and conveyed to the HTP. Based on the amount of wastewater expected to be generated by the Project and future wastewater treatment capacity, adequate wastewater treatment capacity would be available to serve the Project Site together with projected future demand and existing commitments. As such, the Project would have a less than significant impact with respect to wastewater treatment and infrastructure, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. While the Bureau of Sanitation generally provides waste collection services to single-family and some small multi-family developments, private haulers permitted by the City provide waste collection services for most multi-family residential and commercial developments within the City. Solid waste transported by both public and private haulers

⁶⁶ Utility Infrastructure Technical Report: Wastewater, KPFF Consulting Engineers, January 16, 2018.

is either recycled, reused, transformed at a waste-to-energy facility, or disposed of at a landfill. Landfills within the County are categorized as either Class III or inert waste landfills. Non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste such as construction waste, yard trimmings, and earth-like waste are disposed of in inert waste landfills.⁶⁷ Ten (10) Class III landfills and one inert waste landfill with solid waste facility permits are currently operating within the County.⁶⁸ In addition, there are two solid waste transformation facilities within Los Angeles County that convert, combust, or otherwise process solid waste for the purpose of energy recovery.

In 2016, the City of Los Angeles disposed of approximately 2.71 million tons of solid waste at the County's Class III landfills and approximately 44,942 tons at transformation facilities.^{69,70} The 2.71 million tons of solid waste accounts for approximately 3.17 percent of the total remaining capacity (85.45 million tons) for the County's Class III landfills open to the City as of December 31, 2016.^{71,72}

The permitted inert waste landfill serving the County is Azusa Land Reclamation. This facility currently has 56.34 million tons of remaining capacity and an average daily in-County disposal rate of 897 tons per day.⁷³

Los Angeles County continually evaluates landfill disposal needs and capacity through preparation of the Los Angeles County Countywide Integrated Waste Management Plan (ColWMP) Annual Reports. Within each annual report, future landfill disposal needs over the next 15-year planning horizon are addressed in part by determining the available landfill capacity.⁷⁴ Based on the most recent 2016 ColWMP Annual Report, the remaining total disposal capacity for the County's Class III landfills is estimated at 103.18 million tons.

⁶⁷ Inert waste is waste which is neither chemically or biologically reactive and will not decompose. Examples of this are sand and concrete.

⁶⁸ County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2016 Annual Report, September 2017. The 10 Class III landfills within the County include the Antelope Valley Landfill, the Burbank Landfill, the Calabasas Landfill, Chiquita Canyon Landfill, Lancaster Landfill, Pebbly Beach Landfill, San Clemente Landfill, Savage Canyon Landfill, the Scholl Canyon Landfill, and the Sunshine Canyon City and County Landfill. Azusa Land Reclamation is the only permitted Inert Waste Landfill in the County that has a full solid waste facility permit.

⁶⁹ These numbers represent waste disposal, not generation, and thus do not reflect the amount of solid waste that was diverted via source reduction and recycling programs within the City.

⁷⁰ County of Los Angeles, Department of Public Works, Solid Waste Information System, Detailed Solid Waste Disposal Activity Report By Jurisdictions by Los Angeles (Reporting Period: January 2016 to December 2016).

⁷¹ $(2.71 \text{ million tons} \div 85.45 \text{ million tons}) \times 100 = 3.17 \text{ percent}$.

⁷² County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2016 Annual Report, September 2017, Appendix E-2 Table 1.

⁷³ County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2016 Annual Report, September 2017.

⁷⁴ County of Los Angeles, Department of Public Works. Los Angeles County Integrated Waste Management Plan 2016 Annual Report, September 2017.

Based on the 2016 CoIWMP Annual Report, the countywide cumulative need for Class III landfill disposal capacity through the year 2031 will exceed the 2016 remaining permitted Class III landfill capacity of 103 million tons. Therefore, the Annual Report evaluated seven scenarios to increase capacity and determined that the County would be able to meet the disposal needs of all jurisdictions through the 15-year planning period with six of the seven scenarios. Only the scenario involving utilization of permitted in-county disposal capacity only would result in a shortfall. The Annual Report also concluded that in order to maintain adequate disposal capacity, individual jurisdictions must continue to pursue strategies to maximize waste reduction and recycling, expand existing landfills, study, promote, and develop alternative technologies, expand transfer and processing infrastructure, and use out of county disposal, including waste by rail. The City's Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA) Plan sets a goal of becoming a "zero waste" city by 2030. To this end, the City of Los Angeles implements a number of source reduction and recycling programs such as curbside recycling, home composting demonstration programs, and construction and demolition debris recycling.⁷⁵ The City of Los Angeles is currently diverting 76 percent of its waste from landfills.⁷⁶ The City has adopted the goal of achieving 90 percent diversion by 2025, and zero waste by 2030.

The following analysis quantifies the Project's construction and operation solid waste generation.

Construction

The Project Site is currently developed with three buildings that total 39,328 square feet of floor area. To provide for the proposed Project, the three buildings would be removed. The Project proposes a creative campus comprised of 202,954 square feet of creative office space, 16,000 square feet of retail and restaurant space, and 3,235 of event and meeting space. In addition, 711 vehicle parking spaces would be provided in up to two subterranean parking levels and one ground floor parking level. Overall, the Project proposes the construction of 222,189 square feet of floor area, resulting in a net increase of approximately 182,861 square feet of floor area upon buildout.

Pursuant to the requirements of Senate Bill 1374,⁷⁷ the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Materials that could be recycled or salvaged include asphalt, glass, and concrete. Debris not recycled could be accepted at the inert waste landfill (Azusa Land Reclamation) within Los Angeles County and within the Class III landfills open to the City. As shown in Table B-2 on page B-53, after accounting for mandatory recycling, the Project would result in approximately 3,486 tons of construction and demolition waste. Given the remaining permitted capacity the Azusa Land Reclamation facility, which is approximately 56.34 million tons, as well as the

⁷⁵ City of Los Angeles, Solid Waste Integrated Resource Plan FAQ.

⁷⁶ LA Sanitation, Recycling, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?_adf.ctrl-state=alxbkb91s_4&_afLoop=18850686489149411#!, accessed January 12, 2018.

⁷⁷ Senate Bill 1374 requires that jurisdictions include in their annual AB 939 report a summary of the progress made in diverting construction and demolition waste. The legislation also required that CalRecycle adopt a model ordinance for diverting 50 to 75 percent of all construction and demolition waste from landfills.

Table B-2
Project Demolition and Construction Waste Generation

Building	Size	Generation Rate (lbs/sf)^{a,b}	Total (tons)^b
Construction Waste			
Creative Office	202,954 sf	3.89	395
Retail/Restaurant	16,000 sf	3.89	37
Event and Meeting Space	3,235 sf	3.89	6
Total Construction Waste			438
Demolition Waste			
Office	7,106 sf	155	551
Creative Office	16,000 sf	155	1,240
Light Industrial	16,222 sf	155	1,257
Total Demolition Waste			3,048
Total for Construction and Demolition Waste			3,486
Total After 75-Percent Recycling			872
<i>lb = pound</i> <i>sf = square feet</i> <i>Numbers may not sum due to rounding.</i> ^a U.S. Environmental Protection Agency, Report No. EPA530-98-010, <i>Characterization of Building-Related Construction and Demolition Debris in the United States</i>, June 1998, Table 4 and Table 6. Generation rates used in this analysis are based on an average of individual rates assigned to specific building types. ^b Numbers have been rounded to the nearest whole number. Source: Eyestone Environmental, 2018.			

remaining 85.45 million tons of capacity at the Class III landfills open to the City, the landfills serving the Project Site would have sufficient capacity to accommodate the Project's construction solid waste disposal needs.

Operation

As shown in Table B-3 on page B-54, the Project's net increase in solid waste generation would be approximately 733 tons of solid waste per year. The estimated solid waste is conservative because the waste generation factors used do not account for recycling or other waste diversion measures such as compliance with AB 341, which requires California commercial enterprises and public entities that generate four cubic yards or more per week of waste, and multi-family housing with five or more units, to adopt recycling practices. Likewise, the analysis does not include implementation of the City's Zero Waste LA franchising system, which is expected to result in a reduction of landfill disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent

Table B-3
Estimated Project Solid Waste Generation

Building	Size	Employees per 1,000 sf^a	Estimated No. of Employees^c	Solid Waste Generation Rate^b	Total Generation (tons/year)^c
Existing to be Removed					
Office	7,106 sf	4.79	34	0.73 tons/emp/yr	25
Creative Office	16,000 sf	4.79	46	0.73 tons/emp/yr	56
Light Industrial	16,222 sf	1.35	31	1.67 tons/emp/yr	37
Total Existing					117
Proposed					
Creative Office	202,954 sf	4.79	981	0.73 tons/emp/yr	710
Retail/Restaurant	16,000 sf	2.71	52	2.98 tons/emp/yr	129
Event/Meeting Space	3,235 sf	4.79		0.73 tons/emp/yr	11
Total Project					850
Total Net Increase					733
<i>emp = employee</i> <i>sf = square feet</i> <i>Numbers may not sum due to rounding.</i> ^a Based on employment generation factors from Los Angeles Unified School District, 2016 Developer Fee Justification Study, March 2017, Table 14. Assumes employee generation rate of 0.00135 employee per square foot (Industrial Park) for light industrial uses, 0.00479 employee per square foot (Standard Commercial Office) for office/creative office and event/meeting space uses, and 0.00271 employee per average square foot (Neighborhood Shopping Centers) for retail and restaurant uses. ^b Non-residential yearly solid waste generation factors are from City of Los Angeles Bureau of Sanitation, City Waste Characterization and Quantification Study, Table 4, July 2002. Assumes solid waste generation rate of 1.67 tons per employee per year (Manufacturing—Other) for light industrial uses, 0.73 tons per employee per year (Services—Other) for office/creative office and event/meeting space uses, and 2.98 tons per employee per year (Retail—Restaurants) for retail/restaurant uses. ^c Numbers have been rounded. Source: Eyestone Environmental, 2018.					

by the year 2025.⁷⁸ The estimated annual net increase in solid waste that would be generated by the Project represents approximately 0.03 percent of the City's annual solid waste disposal⁷⁹ and approximately 0.0009 percent of the remaining capacity for the County's Class III landfills open to the

⁷⁸ The Zero Waste LA Franchise System would divide the City into 11 zones and designate a single trash hauler for each zone. Source: LA Sanitation, "Zero Waste LA—Franchise," www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s-lsh-wwd-s-zwlafr.jsessionid=nJABd_CcLHL4DCOkGSCJWv1buV9atyQtoUkP50TwYHe5jczy6OaK!782088041!NONE?_afLoop=17071741526736871&_afWindowMode=0&_afWindowId=null#!%40%40%3F_afWindowId%3Dnull%26_afLoop%3D17071741526736871%26_afWindowMode%3D0%26_adf.ctrl-state%3Dge1mehnju_4, accessed December 13, 2017.

⁷⁹ 761 tons per year/2.71 million tons per year x 100 = 0.03%

City of Los Angeles.⁸⁰ The Project's estimated solid waste generation would therefore represent a nominal percentage of the remaining daily disposal capacity of the County's Class III landfills.

Based on the above, the landfills that serve the Project Site would have sufficient permitted capacity to accommodate the solid waste that would be generated by the construction and operation of the Project. Therefore, impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

g) Comply with federal, state, and local statutes and regulations related to solid waste?

Less Than Significant Impact. Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): (1) source reduction; (2) recycling and composting; and (3) environmentally safe transformation and land disposal. In addition, AB 1327 provided for the development of the California Solid Waste Reuse and Recycling Access Act of 1991, which requires the adoption of an ordinance by any local agency governing the provision of adequate areas for the collection and loading of recyclable materials in development projects. Furthermore, AB 341, which became effective on July 1, 2012, requires businesses and public entities that generate four cubic yards or more of waste per week and multi-family dwellings with five or more units, to recycle. The purpose of AB 341 is to reduce greenhouse gas emissions by diverting commercial solid waste from landfills and expand opportunities for recycling in California. In addition, in March 2006, the Los Angeles City Council adopted RENEW LA, a 20-year plan with the primary goal of shifting from waste disposal to resource recovery within the City, resulting in "zero waste" by 2030. The plan also calls for reductions in the quantity and environmental impacts of residue material disposed in landfills.

In October 2014, Governor Jerry Brown signed AB 1826, requiring businesses to recycle their organic waste⁸¹ on and after April 1, 2016, depending on the amount of waste generated per week. Beginning January 1, 2017, businesses that generate four cubic yards of organic waste per week were required to arrange for organic waste recycling services.

The Project would comply with and be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171687), which requires that development projects include an on-site recycling area or room of specified size.⁸² The Project would also comply with AB 939, AB 341, AB 1826 and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. Since the Project would comply with federal, State, and local statutes and regulations related to solid waste, impacts would be

⁸⁰ 761 tons per year/85.45 million tons x 100 = 0.0009%

⁸¹ Organic waste refers to food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste.

⁸² Ordinance No. 171687, adopted by the Los Angeles City Council on August 6, 1997.

less than significant and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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XIX. MANDATORY FINDINGS OF SIGNIFICANCE.

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

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

Potentially Significant Impact. As discussed above, the Project is located in a highly urbanized area and does not serve as habitat for fish or wildlife species. No sensitive plant or animal community or special status species occur on the Project Site. However, the Project does have the potential to degrade the quality of the environment or affect important examples of prehistory. Therefore, further evaluation of this topic will be provided in the EIR.

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

Potentially Significant Impact. The potential for cumulative impacts occurs when the impacts of the Project are combined with impacts from related development projects and result in impacts that are greater than the impacts of the Project alone. Located within the vicinity of the Project Site are other current and reasonably foreseeable projects, the development of which, in conjunction with that of the Project, may contribute to potential cumulative impacts. Impacts of the Project on both an individual and cumulative basis will be analyzed in the EIR for the following subject areas: air quality; cultural resources; greenhouse gas emissions; hazards and hazardous materials; hydrology/water quality/groundwater; land use and planning; noise; fire protection; police protection; transportation/traffic; tribal cultural resources; and water supply.

With regard to cumulative effects with respect to agriculture and forest resources, biological resources, geology and soils, mineral resources, population and housing, schools, parks and recreation, libraries, wastewater, and solid waste, the Project's incremental contribution to potential cumulative impacts would not be cumulatively considerable, as discussed in the following analysis.

With regard to agriculture and forest resources, biological resources, and mineral resources, no such resources are located on the Project Site. In addition, due to the developed nature of the Project Site and surrounding area, no sensitive species or natural communities are present within the Project Site. Thus, the Project would have no impact to agriculture, biological, and mineral resources, and therefore could not combine with other projects to result in cumulative impacts.

With regard to geology and soils, due to their site-specific nature, geology and soils impacts are typically assessed on a project-by-project basis or for a particular localized area. Therefore, as with the Project, related projects would address site-specific geologic hazards through the implementation of site-specific geotechnical recommendations and/or mitigation measures. Cumulative development would expose a greater number of people to seismic hazards. However, as with the Project, related projects would be subject to local, state, and federal regulations and standards for seismic safety. Thus, Project impacts related to geology and soils would not be cumulatively considerable and would be less than significant.

With regard to population and housing, schools, parks and recreation, libraries, wastewater, and solid waste, the Project's incremental contribution to potential cumulative impacts would not be cumulatively considerable. Specifically, as discussed in the analysis above, the Project does not propose the development of residential uses and thus would not directly contribute to population growth within the Project Site area. In addition, the Project would not result in a notable indirect increase in demand for new housing, and any new indirect demand, should it occur, would be minor in the context of forecasted growth for the City of Los Angeles or the Central City North Community Plan area. Further, the Project would not generate a direct residential population that could increase the demand for schools, parks and recreational facilities, and libraries and any indirect increase in the local residential population would be inconsequential. Additionally, the Project would generate a net of approximately 64,888 gallons of wastewater per day, or approximately 0.065 mgd, upon completion. The Project's average daily wastewater flow of 0.065 million gallons per day would represent approximately 0.04 percent of the current 175 million gallons per day available capacity of the HTP. Therefore, Project-generated wastewater would be accommodated by the existing capacity of the HTP. In addition, the City would continue to monitor wastewater flows and update infrastructure, as necessary, to accommodate the growth within the City. New development projects

occurring in the Project vicinity, including the related projects, would also be required to coordinate with the City of Los Angeles via a sewer capacity availability request to determine adequate sewer capacity. Also, new development projects would be subject to LAMC Sections 64.11 and 64.12, which require approval of a sewer permit prior to connection to the sewer system. Lastly, the estimated net increase in solid waste generated by the Project would represent approximately 0.03 percent of the City's annual solid waste disposal, and approximately 0.0009 percent of the remaining disposal capacity for the County's Class III landfills open to the City. Also, based on the 2016 ColWMP Annual Report, the County anticipates that future solid waste disposal needs can be adequately met through 2031. Thus, cumulative impacts for these subject areas would be less than significant, and no further evaluation in an EIR is required.

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

Potentially Significant Impact. Based on the analysis contained in this Initial Study, the Project could result in potentially significant impacts with regard to the following topics: air quality; cultural resources; greenhouse gas emissions; hazards and hazardous materials; hydrology/water quality/groundwater; land use and planning; noise; fire protection; police protection; transportation/traffic; tribal cultural resources; and water supply. As a result, these potential effects will be analyzed further in an EIR for the Project.