City of Los Angeles

Department of City Planning • Environmental Analysis Section

City Hall • 200 N. Spring Street, Room 750 • Los Angeles, CA 90012

Initial Study

This document comprises the Initial Study as required under the California Environmental Quality Act

Central City North Community Plan Area

Arts District Center

Case Number: ENV-2016-4476-EIR

Location: 1101 E. 5th Street, 445-457 South Colyton Street, 450-456 South Seaton Street, Los Angeles 90013

Council District: 14, Jose Huizar

Project Description: The Project Site is located on the north side of 5th Street, between Seaton Street and Colyton Street. The 45,721 square-foot (1.05-acre) Project Site is currently improved with a two-story industrial structure roughly 91,000 square feet in size. Directly adjacent to all sides of the Site are similarly zoned industrial land and structures. The area is zoned M3-1-RIO and has a General Plan Land Use designation of Heavy Manufacturing. Additional zoning information includes the Los Angeles State Enterprise Zone (ZI-2129) and various footnotes in the Central City North Community Plan related to floor area ratio and allowable uses. The Site is not located in a specific plan area, overlay zone, or methane zone.

The Project would demolish and remove all existing uses. The Applicant proposes a new mixed-use development consisting of 129 Live/Work condominium units, including 11% very-low income affordable housing units, a 113-room hotel, and 72,469 square feet of commercial space, to be used for art galleries, retail, restaurant, creative office and special events. The Project would be 12 stories (148 feet) in height. 539 automobile parking spaces will be provided in four of five subterranean levels. 164 long term and 48 short term bicycle parking spaces will be provided at the Site.

Discretionary Actions:

1. Pursuant to LAMC Section 11.5.6 & Charter Sec. 558, a General Plan Amendment (GPA) to change the Central City North Community Plan land use designation of the Project Site from Heavy Manufacturing to Regional Center Commercial;
2. Pursuant to LAMC Section 12.32Q, a Vesting Zone Change and Height District Change to change the zoning of the Project site from M3-1-RIO to C2-2-RIO;
3. Pursuant to LAMC Section 17.01 et seq., a Vesting Tentative Tract Map No. 74703 for a 12-lot subdivision for merger and re-subdivision with a request for haul route approval;
4. Pursuant to LAMC Section 16.05, Site Plan Review;
5. Pursuant to LAMC Section 12.22.A.25 (g)(2), Density Bonus Compliance Review for the provision of 11% Very-Low income affordable housing units with two on-menu incentives (a 35% increase in Floor Area Ratio and a reduced side yard setback of 12 feet in lieu of 14 feet). No density bonus units are requested;
6. Pursuant to LAMC Section 12.24 W.1, Master Conditional Use Permit for on-site and off-site sales and consumption of alcohol; and
7. Pursuant to LAMC Section 12.24 W.18, Conditional Use Permit for live entertainment and dancing.

APPLICANT:

Arts District Development, LLC
1129 E. 5th Street
Los Angeles, CA 90013

PREPARED BY:

CAJA Environmental Services
11990 San Vicente Boulevard, Ste. 250
Los Angeles, CA 90049

ON BEHALF OF:

The City of Los Angeles
Department of City Planning
Environmental Analysis Section
200 North Spring Street, Room 750
Los Angeles, CA 90012-2601

March 2017

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1. PROJECT DESCRIPTION

The subject of this Initial Study (IS) is the proposed Arts District Center Project (the "Project" or "Proposed Project"), which consists of the redevelopment of an existing industrial property at 1129 E. 5th Street in the Downtown Los Angeles Arts District with a 12-story (148-foot tall) mixed use project consisting of 129 live/work condominium units (200,021 square feet), a 113-room hotel (97,850 square feet), and 72,469 square feet of commercial space, to be used for art galleries, retail, restaurant, creative office and special events. A total of 539 automobile parking spaces would be provided in four of the five subterranean levels. The Project's FAR would be 8.1 to 1.

PROJECT INFORMATION

Project Title:	Arts District Center
Project Location:	1101 E. 5th Street, 445-457 South Colyton Street, 450-456 South Seaton Street, Los Angeles 90013
Lead Agency:	City of Los Angeles, Department of City Planning 200 N. Spring Street, Room 750, Los Angeles, CA 90012
City Staff Contact:	William Lamborn
Applicant:	Arts District Development, LLC

Regulatory Framework

According to CEQA Guidelines, Article 5. Preliminary Review of Projects and Conduct of Initial Study:

15063. INITIAL STUDY

(a) Following preliminary review, the Lead Agency shall conduct an Initial Study to determine if the project may have a significant effect on the environment. If the Lead Agency can determine that an EIR will clearly be required for the project, an Initial Study is not required but may still be desirable.

> *(1) All phases of project planning, implementation, and operation must be considered in the Initial Study of the project.*
>
> *(2) To meet the requirements of this section, the lead agency may use an environmental assessment or a similar analysis prepared pursuant to the National Environmental Policy Act.*
>
> *(3) An initial study may rely upon expert opinion supported by facts, technical studies or other substantial evidence to document its findings. However, an initial study is neither intended nor required to include the level of detail included in an EIR.*

(b) Results.

(1) If the agency determines that there is substantial evidence that any aspect of the project, either individually or cumulatively, may cause a significant effect on the environment, regardless of whether the overall effect of the project is adverse or beneficial, the Lead Agency shall do one of the following:

(A) Prepare an EIR, or

(B) Use a previously prepared EIR which the Lead Agency determines would adequately analyze the project at hand, or

(C) Determine, pursuant to a program EIR, tiering, or another appropriate process, which of a project's effects were adequately examined by an earlier EIR or negative declaration. Another appropriate process may include, for example, a master EIR, a master environmental assessment, approval of housing and neighborhood commercial facilities in urban areas, approval of residential projects pursuant to a specific plans described in section 15182, approval of residential projects consistent with a community plan, general plan or zoning as described in section 15183, or an environmental document prepared under a State certified regulatory program. The lead agency shall then ascertain which effects, if any, should be analyzed in a later EIR or negative declaration.

(2) The Lead Agency shall prepare a Negative Declaration if there is no substantial evidence that the project or any of its aspects may cause a significant effect on the environment.

(c) Purposes. The purposes of an Initial Study are to:

(1) Provide the Lead Agency with information to use as the basis for deciding whether to prepare an EIR or a Negative Declaration.

(2) Enable an applicant or Lead Agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby enabling the project to qualify for a Negative Declaration.

(3) Assist in the preparation of an EIR, if one is required, by:

(A) Focusing the EIR on the effects determined to be significant,

(B) Identifying the effects determined not to be significant,

(C) Explaining the reasons for determining that potentially significant effects would not be significant, and

(D) Identifying whether a program EIR, tiering, or another appropriate process can be used for analysis of the project's environmental effects.

(4) Facilitate environmental assessment early in the design of a project;

(5) Provide documentation of the factual basis for the finding in a Negative Declaration that a project will not have a significant effect on the environment;

(6) Eliminate unnecessary EIRs;

(7) Determine whether a previously prepared EIR could be used with the project.

(d) Contents. An Initial Study shall contain in brief form:

(1) A description of the project including the location of the project;

(2) An identification of the environmental setting;

(3) An identification of environmental effects by use of a checklist, matrix, or other method, provided that entries on a checklist or other form are briefly explained to indicate that there is some evidence to support the entries. The brief explanation may be either through a narrative or a reference to another information source such as an attached map, photographs, or an earlier EIR or negative declaration. A reference to another document should include, where appropriate, a citation to the page or pages where the information is found.

(4) A discussion of the ways to mitigate the significant effects identified, if any;

(5) An examination of whether the project would be consistent with existing zoning, plans, and other applicable land use controls;

(6) The name of the person or persons who prepared or participated in the Initial Study.

Regional Setting

The Project Site is located at 1101 E. 5th Street (with additional addresses of 445-457 South Colyton Street and 450-456 South Seaton Street) within the Central City North Community Plan Area (CCNCP) of the City of Los Angeles, approximately one mile east of the heart of Downtown Los Angeles. The Site is approximately 3 miles north of the City of Vernon boundary south of Washington Boulevard and is approximately 2.5 miles west of the unincorporated Los Angeles County (East Los Angeles area) boundary at Indiana Street. The CCNCP area is in the Downtown section of Los Angeles. The plan area is bounded by Elysian Park to the north; Alameda Street to the west; the City of Vernon to the south; and the Los Angeles River to the east. The CCNCP area is generally fully developed with a mix of older industrial and newer arts-oriented commercial and residential properties and includes both the Arts District and Chinatown, generally to the east and north of downtown Los Angeles. The CCNCP area is surrounded by the City of Los Angeles community plan areas of Central City to the west; Southeast Los Angeles to the southwest; Silver Lake-Echo Park-Elysian Valley to the north; and both Northeast Los Angeles and Boyle Heights to the east. The Project Site is located approximately 14 miles east of the Pacific Ocean.

See Figure 1, Regional Vicinity Map, for the location within the context of the City. See Figure 2, Aerial Map, for the Project Site and immediate surrounding areas.

Regional and Local Access

The Hollywood Freeway (US-101) and the Santa Monica Freeway (I-10) provide primary regional access to the Project Site. The Hollywood Freeway runs in a north-south direction east of the Project Site, while the Santa Monica Freeway runs in an east-west direction south of the Project Site. These two freeways also provide access to the Harbor Freeway (I-110) to the west, to the Santa Ana (I-5) freeway to the south, to the Golden State Freeway (I-5) to the north, and to the San Bernardino (I-10) and Pomona (SR-60) freeways to the east. Major surface street arterials within the vicinity include Alameda Street, Santa Fe Avenue, 4th Street, 6th Street, and 7th Street. Local access is provided by Alameda Street, 4th Street, 5th Street, Seaton Street, and Colyton Street.

Public Transit

Union Station is located approximately one mile north of the Project Site and serves as the focus of public transit and train service within the Central City North Community Plan area. Union Station is surrounded by several public infrastructure facilities, including a county jail, educational facilities, and water/power utility facilities.

The Los Angeles County Metropolitan Transportation Authority (Metro) provides bus, transitway, and rail service to the immediate vicinity of the Project Site. The Project Site is located approximately 0.6 mile southeast of the Little Tokyo/Arts District Metro Gold Line Station. The Gold Line provides access to the other transit lines operated by Metro. It is anticipated that the proximity of the Project Site to the Gold Line Station would encourage the use of transit by on-site residents and their guests, as well as by retail and restaurant patrons. The Project Site is also served by Metro's Downtown DASH A bus line, which runs on weekdays along 3rd Street near the Site, and Metro Local 18 bus service along 6th Street near the Site on both weekdays and weekends. Additionally, a new Metro bike share station is located at 1210 East 5th Street.

The Project Site is in close proximity to Metro's bus system. The nearest express bus (Metro Rapid) stop is on Metro Rapid Bus Line 720, which runs east-west along 6th Street, and is located on 6th Street between Alameda Street and Central Avenue, approximately one-fifth of a mile southwest of the Project Site. Metro Rapid Line 720 continues to the west through Downtown Los Angeles and then along Wilshire Boulevard to its final destination in Santa Monica. Going east along 6th Street, Metro Rapid Bus 720 continues to run along Whittier Boulevard through East Los Angeles to the Commerce Center.

The nearest local bus (Metro Local) stop to the Project Site (and closest public transit stop of any type) is on Metro Local Bus Line 18, which runs east-west along 6th Street, and is located on 6th Street at Mateo Street, approximately 120 feet south of the Project Site. Metro Local Line 18 continues to the west through Downtown Los Angeles and then along Wilshire Boulevard to its final destination at Western Avenue in the Wilshire District. Going east along 6th Street, Metro Local Line 18 continues to run along Whittier Boulevard through East Los Angeles and eastward to the Metrolink station in Montebello. Local Line 18

operates between 5:00 am and 9:00 pm with eight-minute headways during weekday peak periods and 15-60 minute headways on weekends.

Metro DASH Bus Line A serves the Arts District on weekdays, with a stop at Traction Avenue and Merrick Street, approximately one-quarter mile north of the Project Site. Metro DASH Line A runs to the west along 1st Street with convenient stops near City Hall, the Civic Center and County buildings, and then running south along Figueroa Street, and then proceeding along Wilshire Boulevard to City West, with a final stop at Witmer Street, and then returning along 7th Street, with a stop at Metro Rail's 7th Street/Metro Center station. DASH Line A operates on weekdays between 6:00 am and 6:30 pm at about seven-minute headways, but does not operate on weekends.

Other Metro bus routes in the broader vicinity include Local Bus Line 53, which has a stop at the corner of 5th Street and Central Avenue and runs from Downtown to Cal State Dominguez Hills in Carson, and Local Bus Line 62, with stops at 5th Street and Central Avenue northbound and at 6th Street and Central Avenue southbound and runs from Downtown to Hawaiian Gardens.

Site Characteristics

The Project Site is approximately 1.05 acres (approximately 45,721 square feet) in size. The Site is zoned M3-1-RIO, where "M3" refers to Heavy Industrial Zone and the "1" refers to Height District 1. The "RIO" extension refers to the Los Angeles River Improvement Overlay District. For a Height District of 1 in an M zone, the floor-area-ratio (FAR) is limited to 1.5:1. The site's assessor parcel number (APN), zoning, census tract, land use, and acreage are listed in Table 1, Project Site Information. The Project Site is also located within the East Los Angeles State Enterprise Zone and the Arts District Business Improvement District.

Table 1
Project Site Information

Address	APN	Zoning	Census Tract	Land Use Designation	Size
456 S. Seaton Street	5163-025-009	M3-1-RIO	2060.31	Heavy Manufacturing	7,500 sf
454 S. Seaton Street	5163-025-009	M3-1-RIO	2060.31	Heavy Manufacturing	7,500 sf
450 S. Seaton Street	5163-025-009	M3-1-RIO	2060.31	Heavy Manufacturing	7,860 sf
457 S. Colyton Street	5163-025-009	M3-1-RIO	2060.31	Heavy Manufacturing	7,503 sf
451 S. Colyton Street	5163-025-009	M3-1-RIO	2060.31	Heavy Manufacturing	7,503 sf
445 S. Colyton Street	5163-025-009	M3-1-RIO	2060.31	Heavy Manufacturing	7,863 sf
Sources: http://zimas.lacity.org/ and ALTA Survey, Psomas, 2014.					

Existing Uses

The Project Site is located on the north side of 5th Street between Seaton Street and Colyton Street. The Site is developed with an approximately 91,000 square-foot, two-story brick building that contains

approximately 11 tenant arts-oriented businesses. The building is constructed flush with adjacent off-site buildings so that the frontages along both Colyton and Seaton Streets are unbroken. The building covers the majority of the Site and is bordered on its north side by adjacent arts, industrial, and warehousing businesses. Street parking (head-in) is provided on three sides (5th, Seaton and Coylton) of the existing structure, which directly abuts the adjoining off-site buildings to the north. The existing building at the Site was built in approximately 1915 and is approximately 102 years old. No trees or planted vegetation are present on the site, although potted plants and trees are currently positioned along the Site's Colyton Street frontage in the paved area between the travel lane and the building. No sidewalks are present around the Site. Figure 3 provides the existing site survey.

Surrounding Uses

The surrounding land uses are characterized by a mix of industrial and former industrial, commercial, and loft residential uses. The immediate surroundings are zoned M3-1-RIO (Heavy Industrial). Properties located a short distance east of the Site adjacent to the Los Angeles River are zoned PF (Public Facilities) and OS (Open Space).

The Project Site is immediately surrounded by a mix of industrial, gas station, residential, and commercial uses contained in low-rise buildings of widely varying vintages, which are physically separated from the Project Site by streets and a former rail right-of-way. The closest residential uses to the Project Site are the Molino Street Lofts, located approximately two blocks east of the site at 530 Molino Street. One block to the southwest of the Molino Street Lofts are the Barker Block Residences, at 510 Hewitt Street. To the southeast (corner of 5th and Hewitt Street) there is a restaurant, next to a tow service parking lot and the new half-acre Arts District green space/park. The park sits immediately north of the La Kretz Innovation Campus, a 60,000 square foot facility which serves as an incubator for local startups in the cleantech industry.

The Project Site sits on the southern portion of the city block bounded by 4th Street to the north, Colyton Street to the east, 5th Street to the south, and Seaton Street to the west.

North

Immediately to the north of the Project Site there is a three-story warehouse hosting an event space and creative business offices and creative business offices, and two one-story warehouses hosting commercial uses.

South

South, across 5th Street, is located, from east to west, a surface asphalt parking lot associated with a four-story warehouse/office building (fronting on Colyton Street), another gated surface paved parking lot, and a single-story stucco industrial office building at the corner of 5th Street and Seaton Street. The latter structure may be completely or partially vacant.

East

East across Colyton Street are single-story industrial and/or warehouse building with associated gated surface parking and exterior shed facilities.

West

West across Seaton Street is located a single-story brick industrial and/or warehouse building with associated gated surface parking. Immediately to the south of this (across 5th Street) is a commercial truck fueling station operated by Valero.

Proposed Project

The Project proposes the removal of all existing structures, and construction of a single 12-story (148-foot tall) building containing 129 live/work condominium units (200,021 square feet), a 113-room hotel (97,850 square feet), and 72,469 square feet of commercial space, to be used for art galleries (10,341 square feet), retail (26,979 square feet), restaurant (31,719 square feet), and Artist CoLab (3,430 square feet). A total of 539 automobile parking spaces would be provided in four of the five subterranean levels. The Project's FAR would be 8.1 to 1. Eleven percent of the base density would be set aside as restricted affordable (Very Low) units.

Table 2, Proposed Floor Area, provides a breakdown of the proposed uses. Parking areas are excluded from the information in Table 2, but would be located in four of the five subterranean garage levels.

Table 2
Proposed Floor Area

Use	Stories	Size (sf)
Live/Work (129 units)	4-11	200,021
Hotel (113 rooms)	1, 3-12	97,850
Art Galleries	3	10,341
Retail	1-2	26,979
Restaurant	1-2, 12	31,719
ArtistCoLab	3	3,430
Total	**12**	**370,340**

City of Los Angeles Planning and Zoning Floor Area excludes exterior walls, stairs, shafts, rooms housing building equipment, parking areas, driveways, ramps, basement storage. It includes private balconies enclosed on three sides by walls.

The Project would be developed in a single building fronting on both 5th Street and Colyton Street. Vehicular access would be provided from each of these streets, while a loading driveway entrance would be located on the Seaton Street frontage. The 5th Street entry would be a porte-cochere that offers valet parking and temporary valet pick-up/ drop-off areas. The Coylton Street entrance would connect to the 5th Street porte cochere, but would also lead directly to the subterranean parking ramp. Figure 4 presents the proposed site plan, Figures 5-14 illustrate the proposed floor plans, Figure 15 presents the proposed building

section, Figures 16-19 illustrate the proposed building elevations, and Figures 20-21 present renderings of the Project. Additionally, Figures 22-23 provide general landscape schematics for the ground level and roof level of the Project.

The Project would be 12 stories and approximately 148 feet in height above the five subterranean levels, which would extend approximately 50 feet below grade. Of the five subterranean levels, four would be used for parking, while the fifth (B1) would contain storage and bicycle parking. As is illustrated in Figures 16-21, the skin on the exterior of the Project would feature large-scale works of art, intended to change on a rotating basis.

Live/Work Uses

The Project would contain a total of 129 live/work units to be distributed as shown in Table 3.

Table 3
Project Live/Work Unit Distribution

Type	Quantity	Percent	Stories
1-Bedroom	50	39	4-8
1-Bedroom + Den	45	35	4-8
2-Bedroom	6	4	9-11
2-Bedroom + Den	28	22	9-11
Total	**129**	**100**	**4-11**
Source: Togawa Smith Martin Architects, Inc.			

Retail/Restaurant Uses

The 26,979 square feet of retail/commercial uses within the Proposed Project would be located on the ground and second floors. The 31,719 square feet of restaurant space within the Project would be located on the ground, second, and 12th (rooftop) levels and would include both interior and outdoor dining areas.

Hotel Uses

The 113 hotel rooms within the Proposed Project would be located on the fourth through eleventh stories and would be separate from the live/work units on each of these levels. Hotel patrons and live/work unit occupants would utilize separate elevators, although the rooftop amenities would be shared. The hotel lobby would be on the ground level, with the check-in and concierge area and hotel kitchen on the third floor of the Project.

Art Gallery/Creative Office-Events Uses

The 10,341 square feet of art gallery space within the Proposed Project would be located on the third level, as would the 3,430 square feet of creative office and/or events space.

Access

Vehicular access to the Project would be provided from both 5th Street and Colyton Street, with a connecting driveway between each entrance through the center of the Project building. Access to the subterranean parking levels, which would feature an automated/robotic parking system, would be from the Colyton Street entrance. A loading driveway entrance would be located on the Seaton Street frontage. Valet and drop off/pick up areas would be accessed primarily from the 5th Street entrance.

Parking

Table 4 presents the amount of code-required and Project-provided automobile parking. The Project is required to have 304 spaces and would provide 539 spaces, including 59 valet spaces (on level B2) and 480 automated parking spaces (on levels B3 through B5).

Table 4
Vehicle Parking

Use	Amount	Rate	Total
Required Parking			
Live/Work Unit (less than 3 habitable rooms) (LAMC Section 12.22 A.25 (d)(1))	50 units	1.0 space/unit	50
Live/Work Unit (3 or more habitable rooms) (LAMC Section 12.22 A.25 (d)(1))	79 units	1.25 spaces/unit	99
Hotel (1-20 rooms)	20 rooms	0.5 space/room	10
Hotel (21-40 rooms)	20 rooms	0.25 space/unit	5
Hotel (41-113 rooms)	73 rooms	0.17 space/unit	12
Restaurant	25,380 sf [a]	1 space/500 sf	51
Retail	24,950 sf [a]	1 space/500 sf	50
Art Gallery	10,200 sf [a]	1 space/500 sf	20
Creative Office/Events	3,300 sf [a]	1 space/500 sf	7
Total Required			**304**
Provided Parking[a]			
Valet Parking (Level B2)			59
Automated Parking (Levels B3, B4, B5)			480
Total Provided			**539**

[a] *Net square footage.*

Source: Togawa Smith Martin Architects, Inc.

Bicycles

LAMC 12.21 A.16(a)(2) requires new projects to provide bicycle parking spaces. Live/work buildings with more than three units require one long term bicycle parking space per unit and one short term bicycle parking space per 10 units. Office uses require one long term bicycle parking space per 5,000 square feet

and one short term bicycle parking space per 10,000 square feet. Retail and restaurant uses require one long term and one short term bicycle parking space per 2,000 square feet. Hotel uses require one long term and one short term bicycle parking space per 20 guest rooms. Art gallery uses require one long term bicycle parking space and one short term bicycle parking space per 10,000 square feet.

Short term bicycle parking shall consist of bicycle racks that support the bicycle frame at two points. Long term bicycle parking shall be secured from the general public and enclosed on all sides and protect bicycles from inclement weather. All bicycle parking for the Project is proposed to be located on Level B1, in compliance with LAMC 12.21 A.16(e). As required and demonstrated below in Table 5, the Project will provide, at a minimum, 48 short term and 164 long term bicycle spaces, consistent with code requirements.

Table 5
Bicycle Parking

Use	Amount	Rate	Short-Term	Long-Term
Live/Work	129 units	1 per 10 units (short-term) 1 per unit (long-term)	13	129
Hotel	113 rooms	1 per 20 rooms (short-term) 1 per 20 rooms (long-term)	6	6
Retail	24,950 sf [a]	1 per 2,000 sf (short-term) 1 per 2,000 sf (long-term)	12	12
Restaurant	25,380 sf [a]	1 per 2,000 sf (short-term) 1 per 2,000 sf (long-term)	13	13
Art Gallery	10,200 sf [a]	1 per 10,000 sf (short-term) 1 per 10,000 sf (long-term)	2	2
Creative Office/Events	3,300 sf [a]	1 per 10,000 sf (short-term) 1 per 5,000 sf (long-term)	2	2
		Total	**48**	**164**

[a] Net square footage.

Source: Togawa Smith Martin Architects, Inc.

Height

The Proposed Project would have a height at the parapet of 148 above the ground level. The top of the mechanical elements on the roof of the Project would be 154 feet above ground level. There is no maximum height limit within the C2 zone. The C2-2 zoning classification requested for the Project site would allow the proposed Project Floor Area Ratio of 8.1:1.

Open Space

The amounts of required and provided open space for the residential uses in the Proposed Project are presented in Table 6. No open space is required for the commercial or hotel uses. The Project is required to have 16,275 square feet of open space. The Project would provide 22,500 square feet of open space.

Table 6
Open Space

Live/Work Unit Type	Amount	Rate	Total size (sf)
Required Open Space			
Less than 3 habitable rooms	50 units	100 sf/unit	5,000
3 habitable rooms	51 units	125 sf/unit	6,375
More than 3 habitable rooms	28 units	175 sf/unit	4,900
		Total Required	**16,275**
Provided Open Space			
3rd Level Terrace			9,000
Roof Garden/Pool/Terrace			13,500
		Total Open Space Provided	**22,500**
Source: Togawa Smith Martin Architects, Inc.			

Landscaping

No trees are present on the Project Site. Proposed landscaping would consist of trees throughout the ground floor exterior of the Project as well as trees in planters on the exterior portions of the third level and the rooftop amenities area and would comply with LAMC requirements concerning trees (one tree per four residential dwelling units pursuant to LAMC 12.21-G,2(a)(3)).

Green/Conservation Features

The Project will comply with the Los Angeles Green Building Code (LAGBC), which is based on the 2010 California Green Building Standards Code (CalGreen).[1]

Signage/Exterior Building Treatments

Conceptually, the iconic building is envisioned as an urban canvas, with large-scale works of art adorning the south (facing 5th Street), north, and west (facing Seaton Street) elevations. The intent is for these works of art to be rotated on a periodic basis.

Exterior Project and tenant signage would consist of identity, wayfinding, and commercial signs.

[1] *Los Angeles Department of Building and Safety: http://ladbs.org/LADBSWeb/green-bldg.jsf*

Construction Information

The estimated construction schedule is shown in Table 7. Operation would begin in 2020. The amount of materials exported from the Project Site as a result of excavation is estimated to be approximately 92,000 cubic yards.[2] The Project would contain five subterranean levels under the proposed building (approximately 50 feet below grade) in addition to any other excavation typically required for foundation and utility work.

Table 7
Estimated Construction Schedule

Phase	Duration
Demolition	2 months
Site Preparation	1 month
Grading/Excavation	2 months
Building Construction	22 months
Architectural Coatings	2 months
Paving/Landscaping	2 months
Construction schedule, including start, end, and duration dates are estimates only.	

Haul Route

A Haul Route program will be required as part of the City's permitting process. It is anticipated that the demolition, export, and construction debris will be transported to either the Chiquita Canyon Sanitary Landfill in Castaic and/or the Manning Pit Sediment Placement Site in Irwindale. The estimated haul route to Chiquita Canyon is approximately 40 miles and will generally include (most direct path, and to avoid residential neighborhoods): local streets (5th Street to Alameda Street) to US-101 freeway to CA-170 freeway to I-5 freeway to CA-126 freeway to Chiquita Canyon Landfill. The estimated haul route to Manning Pit is approximately 22 miles and will generally include (most direct path, and to avoid residential neighborhoods): local streets (Seaton/Colyton Streets to 4th Street) to US-101 freeway to CA-60 freeway to I-605 freeway to I-10 freeway to Vincent Avenue to Manning Pit.

Project Objectives

The objectives of the Project are as follows:

- Develop an iconic, architecturally-compelling building that adds visual distinction and a unique feature to the Arts District skyline.

[2] *Estimates provided by the Applicant, November 2016.*

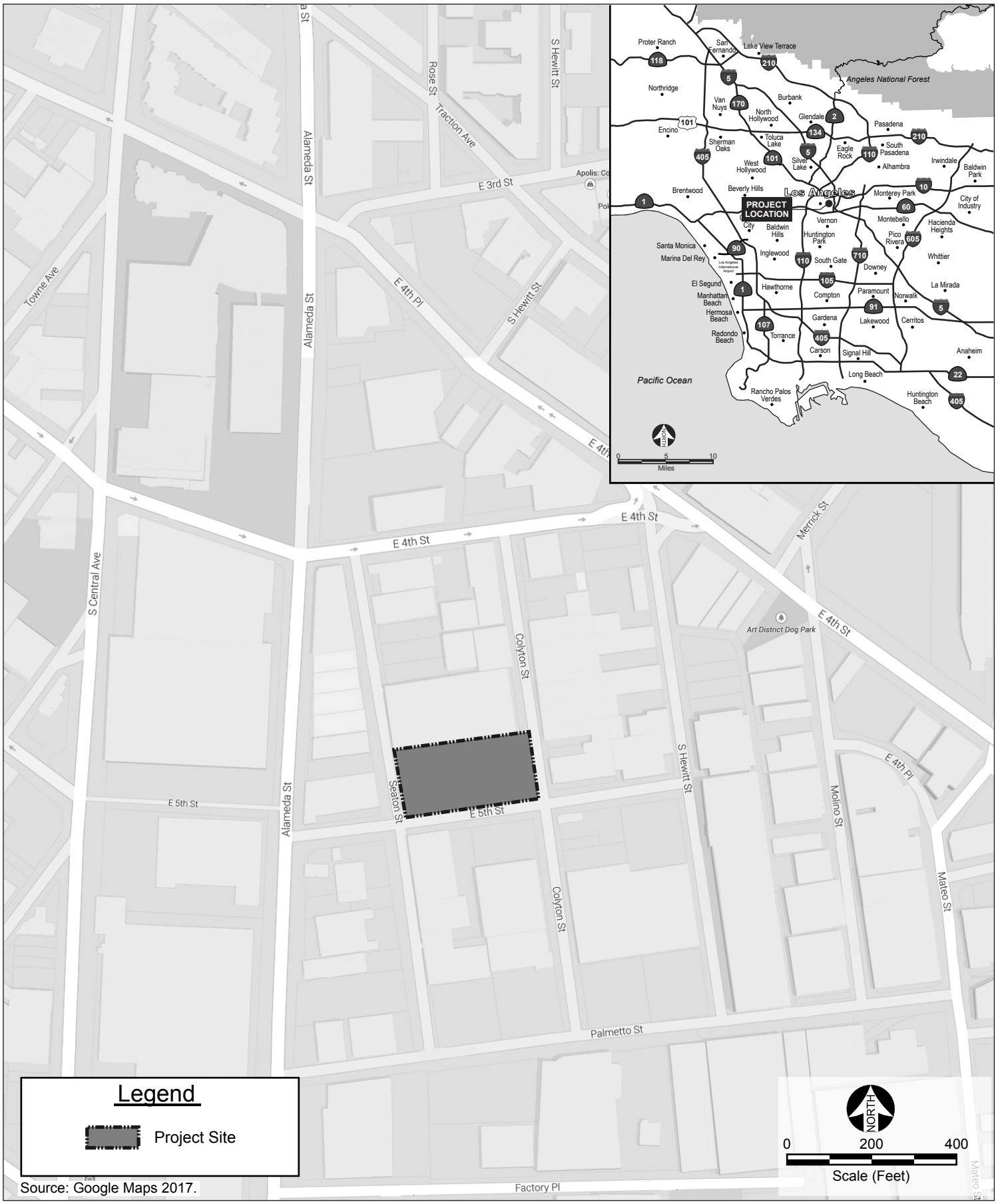
- Redevelop a currently underutilized site into a mixed-use development that combines complementary uses, such as community serving retail, an Artist CoLab, and live/work uses.
- Create an appealing and cutting edge design identity featuring large-scale works of art to serve as a visual symbol of the Arts District.
- Improve the aesthetic quality of the site by removing older structures and developing new efficient buildings that are consistent with others within the burgeoning Arts District.
- Create a range of construction and permanent jobs.
- Improve public safety by creating a development that provides the level of density and mix of uses necessary to activate the area both day and night.
- To meet the demand for urban housing, including affordable housing, within the general Downtown area and specifically within the Arts District.
- Create a catalytic mixed-use project including hotel, residential, and retail uses, focused on the arts that attracts international residents and visitors and contributes to the Arts District community.
- Provide housing in proximity to the Metro Gold Line Station.
- Contribute to the City's economic growth by developing commercial, residential, and hotel uses that generate local tax revenues, provide new construction jobs, and generate residents who support local businesses.

Requested Discretionary Actions

The City of Los Angeles (the City) is the Lead Agency for the Project. In order to construct the Project, the Applicant is requesting approval of the following actions from the City:

1. Pursuant to LAMC Section 11.5.6 & Charter Sec. 558, a General Plan Amendment (GPA) to change the Central City North Community Plan land use designation of the Project Site from Heavy Manufacturing to Regional Center Commercial;
2. Pursuant to LAMC Section 12.32Q, a Vesting Zone Change and Height District Change to change the zoning of the Project site from M3-1-RIO to C2-2-RIO (permitting a maximum FAR of 8.1:1 and a maximum height of 148 feet to the top of the parapet);
3. Pursuant to LAMC Section 17.01 et seq., a Vesting Tentative Tract Map No. 74703 for a 12-lot subdivision for merger and re-subdivision with a request for haul route approval;
4. Pursuant to LAMC Section 16.05, Site Plan Review;
5. Pursuant to LAMC Section 12.22.A.25(g)(2), Density Bonus Compliance Review for the provision of 11% Very-Low income affordable housing units with two on-menu incentives (a 35% increase in Floor Area Ratio and a reduced side yard setback of 12 feet in lieu of 14 feet). No density bonus units are requested;

6. Pursuant to LAMC Section 12.24 W.1, Master Conditional Use Permit for on-site and off-site sales and consumption of alcohol;
7. Pursuant to LAMC Section 12.24 W.18, Conditional Use Permit for live entertainment and dancing; and
8. Any other entitlements and permits necessary to construct the Project.



Source: Google Maps 2017.

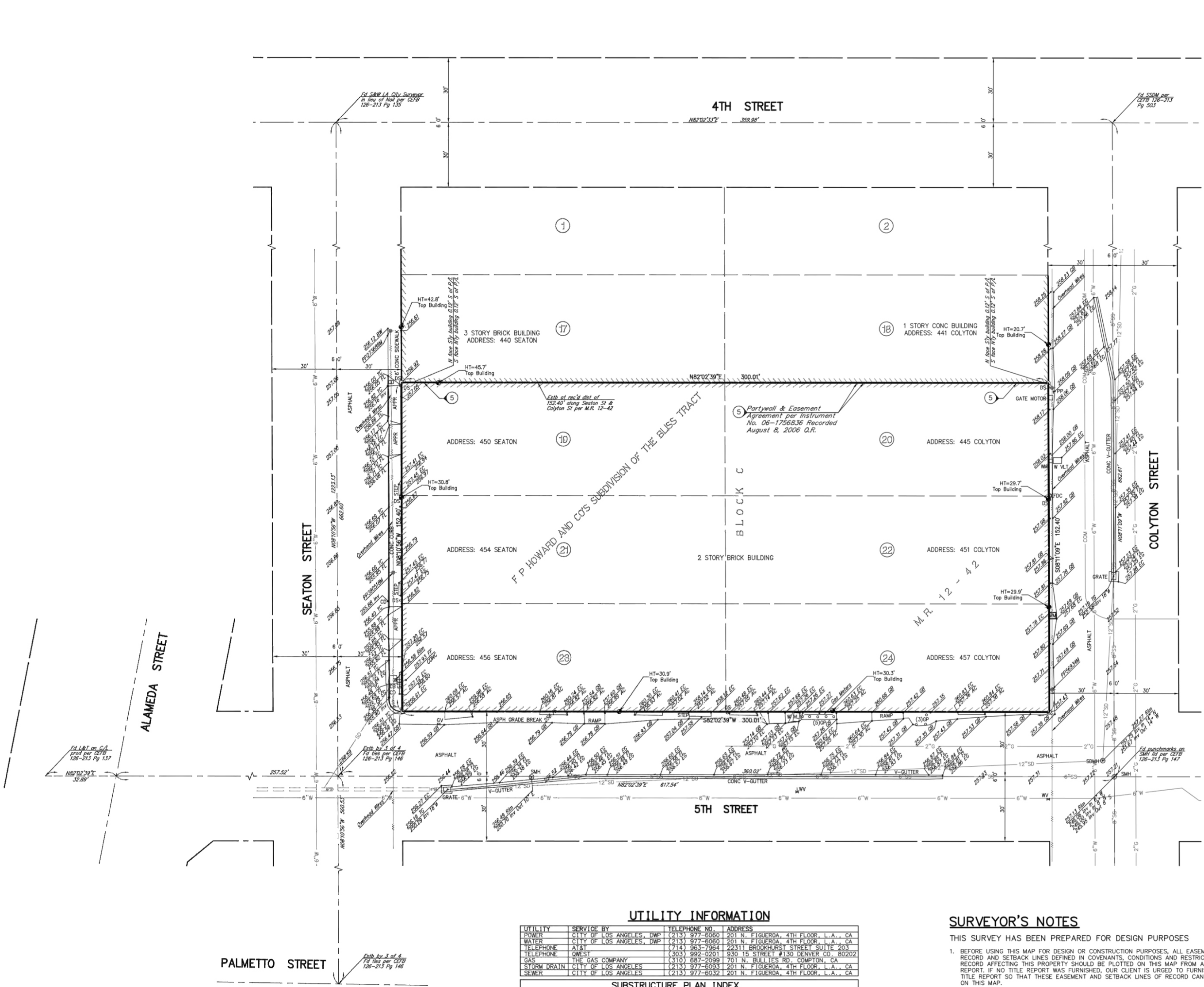
CAJA Environmental Services, LLC

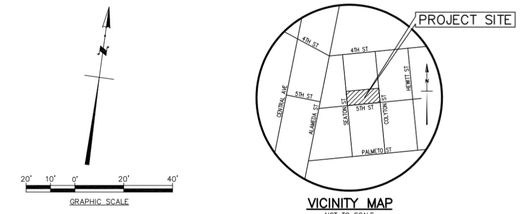
Figure II-1
Project Vicinity Map

Source: Google Maps, 2014.

CAJA Environmental Services, LLC

Figure 2
Aerial Map





VICINITY MAP
NOT TO SCALE

COMMENTS:

BOUNDARY LINES. . . . . . . WERE ESTABLISHED FROM RECOVERED CITY, COUNTY AND/OR PRIVATE SURVEY MONUMENTS WHOSE CHARACTER AND SOURCE ARE SO NOTED ON THE SURVEY.

LEGAL DESCRIPTION . . . . FROM INFORMATION SUPPLIED BY CLIENT. USUALLY A TITLE POLICY OR TITLE REPORT.

EASEMENTS . . . . PLOTTABLE EASEMENTS ARE SHOWN FROM AN OWNER SUPPLIED TITLE REPORT. NON-PLOTTABLE ONES ARE NOTED ON THE SURVEY AS HAVING "EFFECT OF". BECAUSE OUR SERVICE IS LIMITED TO REPORTING ON EASEMENT LOCATIONS WE STRONGLY RECOMMEND LEGAL COUNSEL BE RETAINED TO REPORT ON TITLE PAPERS IN THEIR ENTIRETY.

TITLE REPORT . . . . .STEWART TITLE OF CALIFORNIA, INC. PRELIMINARY TITLE REPORT NO. 01180-111683 DATED JUNE 18, 2014.

INDICATES TITLE REPORT EXCEPTION NO.

BASIS OF BEARINGS . . . . . .THE BEARING OF N82°02'33"E OF THE CENTERLINE OF 4TH STREET, SHOWN ON TRACT NO. 67247 AS PER MAP FILED IN BOOK 1372 PAGE 94-97, INCLUSIVE, OF MAPS, RECORDS OF LOS ANGELES COUNTY, AS N81°51'06"E WAS TAKEN AS THE BASIS OF BEARING FOR THIS SURVEY.

AREA . . . . BASED UPON MEASURED BEARINGS AND DISTANCES AS SHOWN HEREON, THE AREA IS.

45,721 SQ. FT. = 1.0496 ACRES

TOPOGRAPHY. . . . . BY GROUND SURVEY METHODS AND COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS.

LEGAL DESCRIPTION:

LOTS 19 THROUGH 24 INCLUSIVE IN BLOCK "C" OF F.P. HOWARD AND CO'S SUBDIVISION OF THE BLISS TRACT, IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 12, PAGE 42 OF MISCELLANEOUS RECORDS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

LEGEND

. . . . PROPERTY/BOUNDARY LINE
. . . . STREET R/W LINE
. . . . CURB LINE
. . . . CENTER LINE
. . . . FLOW LINE
. . . . LOT LINE/PARCEL LINE
. . . . EASEMENT LINE (W=WIDTH)
100 . . . . CONTOUR LINE
. . . . BUILDING FOOT PRINT LINE
. . . . OVERHANG LINE
. . . . CHAIN LINK FENCE LINE
. . . . WROUGHT IRON FENCE LINE
. . . . GUARD RAIL
. . . . WALL
. . . . EDGE OF ASPHALT PAVING
CB . . . . CATCH BASIN W/ACCESS HOLE
MH . . . . MANHOLE (SEWER, STORM DRAIN, POWER, TELE.)
PP/TP . . . . POWER POLE (PP)/TELEPHONE POLE (TP)
. . . . SIGN (ALL KINDS)
. . . . STREET LIGHT
. . . . TRAFFIC SIGNAL
. . . . TRAFFIC SIGNAL W/STREET LIGHT
. . . . YARD LIGHT
. . . . FIRE DEPARTMENT CONNECTION
. . . . FIRE HYDRANT
DS . . . . DOWNSPOUT
FDC . . . . FIRE DEPARTMENT CONNECTION
PIV . . . . POST INDICATOR VALVE
. . . . DIRECTION OF WATER DRAINAGE FLOW
PM . . . . PARKING METER
GM/WM . . . . GAS/WATER METER
GV/WV . . . . GAS/WATER VALVE
EPB/SLPB/TSPB/UPB . . ELEC./STREET LIGHT/TRAFFIC/UNKNOWN PULL BOX
. . . . TREE IN WELL W/TRUNK DIAMETER
PL . . . . PLANTER
GP . . . . GUARD POST
APPR. . . . . APPROACH (DRIVEWAY)
BFP . . . . BACKFLOW PREVENTER
CO . . . . CLEAN OUT
CHLK . . . . CHAINLINK (FENCE/GATE)
WI . . . . WROUGHT IRON (FENCE/GATE)
. . . . BENCHMARK
123.4 . . . . TOPOGRAPHIC SPOT ELEVATION, NO LEADER
BW . . . . BACK OF WALK ELEVATION
EC . . . . EDGE OF CONCRETE ELEVATION
EG . . . . EDGE OF GUTTER ELEVATION
EP . . . . EDGE OF PAVEMENT ELEVATION
FL . . . . FLOW LINE ELEVATION
TC . . . . TOP OF CURB ELEVATION
TG . . . . TOP OF GRATE ELEVATION
TW . . . . TOP OF WALL ELEVATION
TF . . . . TOP OF FOOTING ELEVATION
RIM . . . . MANHOLE RIM ELEVATION
INV . . . . MANHOLE INVERT ELEVATION
ER . . . . ELEC RISER
EVT . . . . ELEC VAULT
CD . . . . CURB DRAIN
DI . . . . DRAIN INLET
HB . . . . HOSE BIB
WR . . . . WATER RISER
GB . . . . GRADE BREAK
② . . . . RECORD LOT/PARCEL NUMBER
CEFB . . . . CITY OF LOS ANGELES CITY ENGINEER FIELD BOOK
(100.00') . . . . RECORD DIMENSION OR BEARING IF DIFFERENT THAN MEASURED
NAME . . . . ADJACENT PROPERTY OWNER
SS . . . . SANITARY SEWER (SIZE)
SD . . . . STORM DRAIN (SIZE)
W . . . . WATER LINE (SIZE)
G . . . . GAS LINE (SIZE)
P . . . . OIL/PETROLEUM LINE (SIZE)
E . . . . ELECTRICAL LINE
COM . . . . COMMUNICATION LINE
. . . . OVERHEAD UTILITY LINE(S)
T . . . . TELEPHONE LINE
FOCA . . . . FIBER OPTIC CABLE LINE
CATV . . . . CABLE TV LINE
SL . . . . STREET LIGHT POWER LINE

UTILITY INFORMATION

UTILITY	SERVICE BY	TELEPHONE NO.	ADDRESS
POWER	CITY OF LOS ANGELES, DWP	(213) 977-6060	201 N. FIGUEROA, 4TH FLOOR, L.A., CA
WATER	CITY OF LOS ANGELES, DWP	(213) 977-6060	201 N. FIGUEROA, 4TH FLOOR, L.A., CA
TELEPHONE	AT&T	(714) 963-7964	22311 BROOKHURST STREET SUITE 203
TELEPHONE	QWEST	(303) 992-0201	930 15 STREET #130 DENVER CO. 80202
GAS	THE GAS COMPANY	(310) 687-2099	701 N. BULLIES RD. COMPTON, CA
STORM DRAIN	CITY OF LOS ANGELES	(213) 977-6093	201 N. FIGUEROA, 4TH FLOOR, L.A., CA
SEWER	CITY OF LOS ANGELES	(213) 977-6032	201 N. FIGUEROA, 4TH FLOOR, L.A., CA

SUBSTRUCTURE PLAN INDEX

CITY OF LOS ANGELES			
SUBSTRUCTURE 92-16	PLAN NO. 15648		
SUBSTRUCTURE 92-17	PLAN NO. 15309		

The only substructure information made available by public agencies and public utilities is their location within public rights-of-way. Therefore, no on-site substructures are shown on this map. The location of on-site substructures should be determined and verified from other sources before the beginning of any excavation.

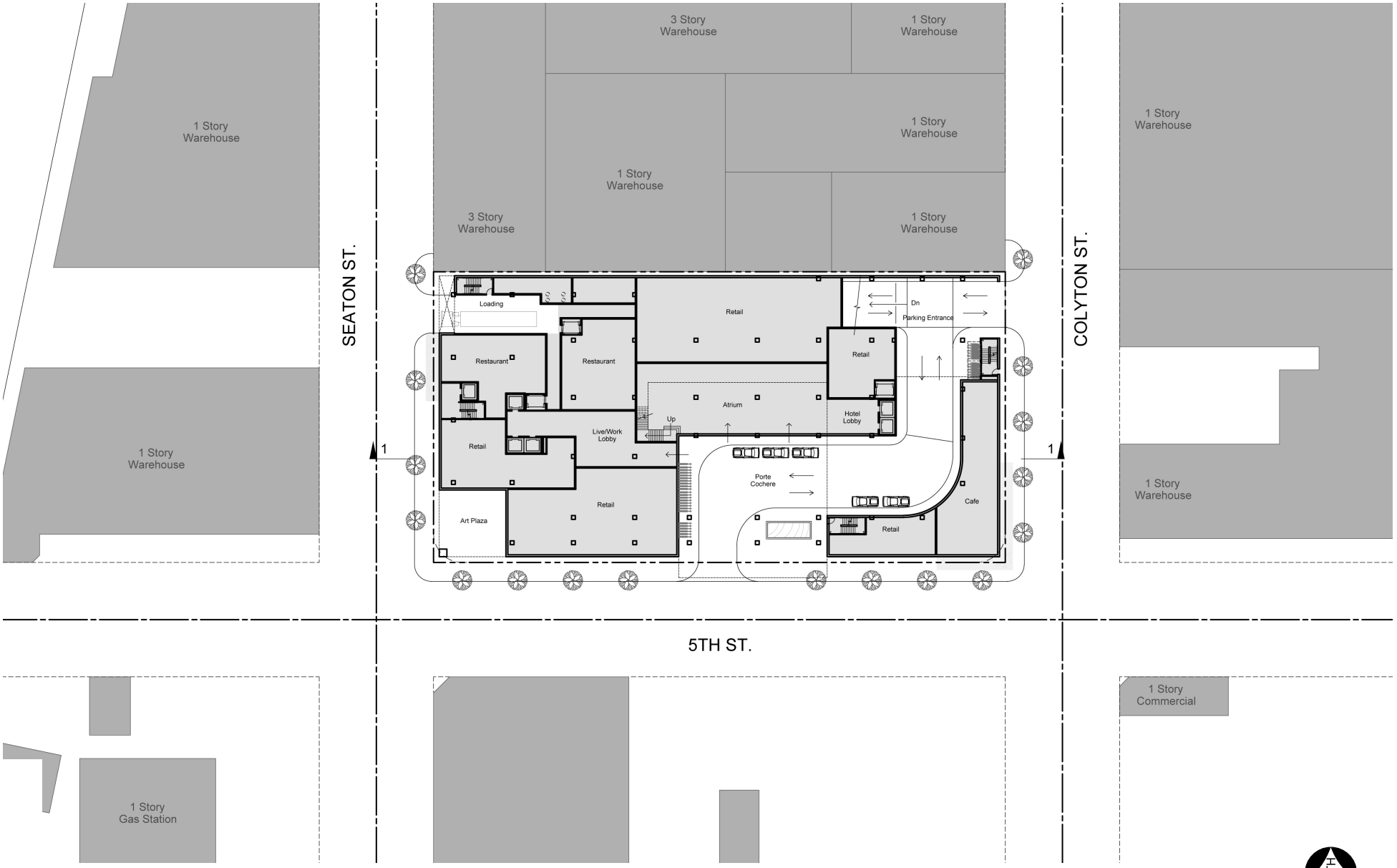
CALL UNDERGROUND SERVICE ALERT (USA) 1 - 800 - 642 - 2444 USA represents many, but not necessarily all, utility and oil companies that have underground lines within the project area. In order to avoid damage to these lines, contact USA two working days prior to digging or excavation. USA will assist in identifying those companies that they represent which have utility lines in the area and contacting the respective companies they represent to have those lines marked on the ground.

SURVEYOR'S NOTES

THIS SURVEY HAS BEEN PREPARED FOR DESIGN PURPOSES

1. BEFORE USING THIS MAP FOR DESIGN OR CONSTRUCTION PURPOSES, ALL EASEMENTS OF RECORD AND SETBACK LINES DEFINED IN COVENANTS, CONDITIONS AND RESTRICTIONS OF RECORD AFFECTING THIS PROPERTY SHOULD BE PLOTTED ON THIS MAP FROM A CURRENT TITLE REPORT. IF NO TITLE REPORT WAS FURNISHED, OUR CLIENT IS URGED TO FURNISH A CURRENT TITLE REPORT SO THAT THESE EASEMENT AND SETBACK LINES OF RECORD CAN BE PLOTTED ON THIS MAP.
2. THIS MAP SHOULD BE EXPANDED TO MEET ALTA REQUIREMENTS IF FINANCING IS TO BE OBTAINED FOR THE PROJECT, REQUIRING AN EXTENDED COVERAGE POLICY OF TITLE INSURANCE.
3. THIS SURVEY DOES NOT INCLUDE EASEMENTS EXCEPT THOSE SPECIFICALLY DELINEATED HEREON.
4. IF UNDERGROUND PUBLIC UTILITIES AND OTHER SUBSTRUCTURES, ZONES, SET BACK AND STREET WIDENING DATA ARE SHOWN HEREON, IT IS FOR INFORMATION ONLY, HAVING BEEN OBTAINED FROM A GENERAL REQUEST AT THE LOCAL AGENCY'S PUBLIC COUNTER AND/OR OTHER SOURCES NOT CONNECTED WITH THIS COMPANY. NO REPRESENTATION IS MADE AS TO THE ACCURACY, CURRENCY OR COMPLETENESS OF SAID INFORMATION AND ANY USERS OF SAID INFORMATION IS URGED TO CONTACT THE UTILITY OR LOCAL AGENCY DIRECTLY.

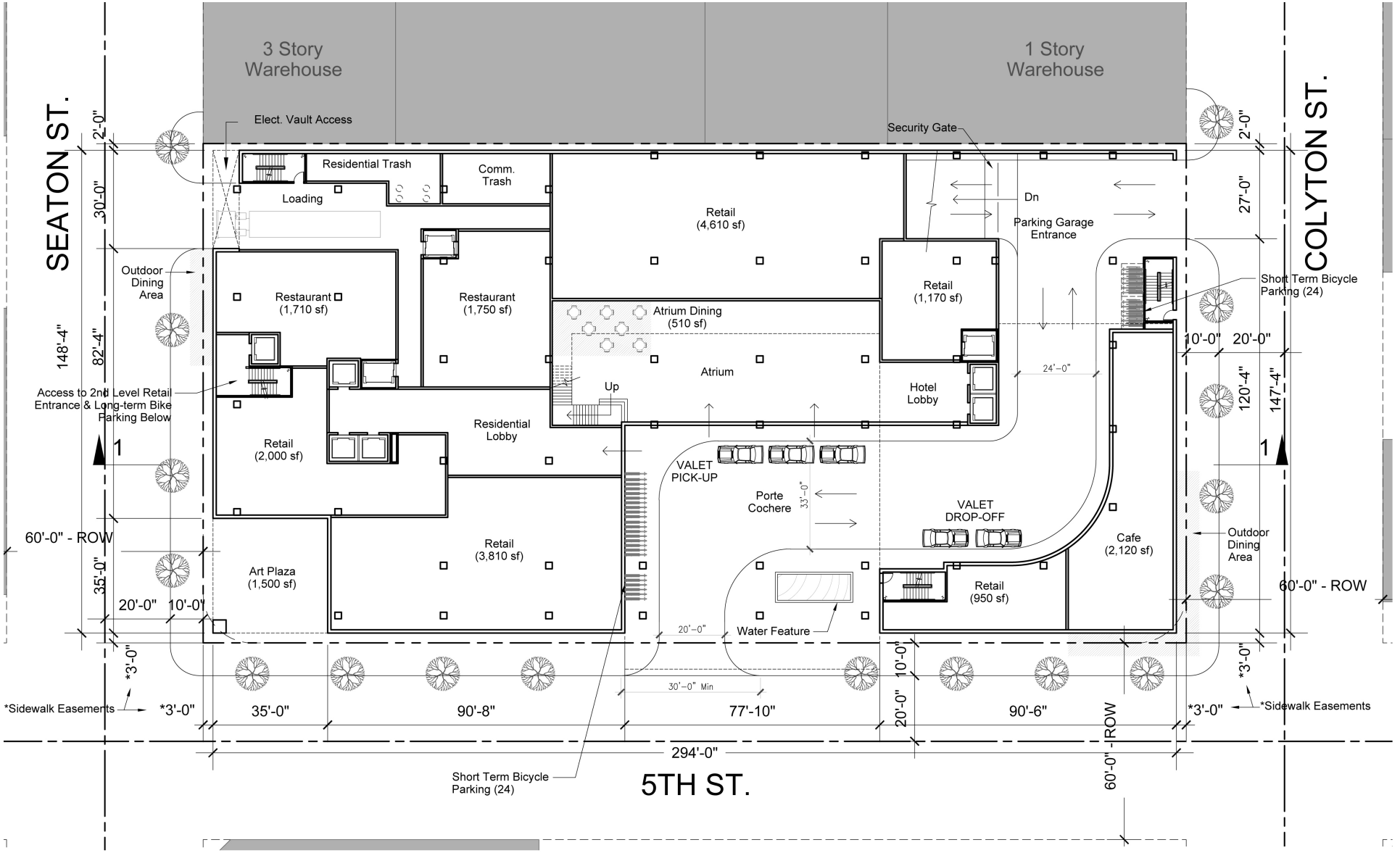
Figure 3
Existing Site Survey



Source: Togawa Smith Martin Architects, 2016.

CAJA Environmental Services, LLC

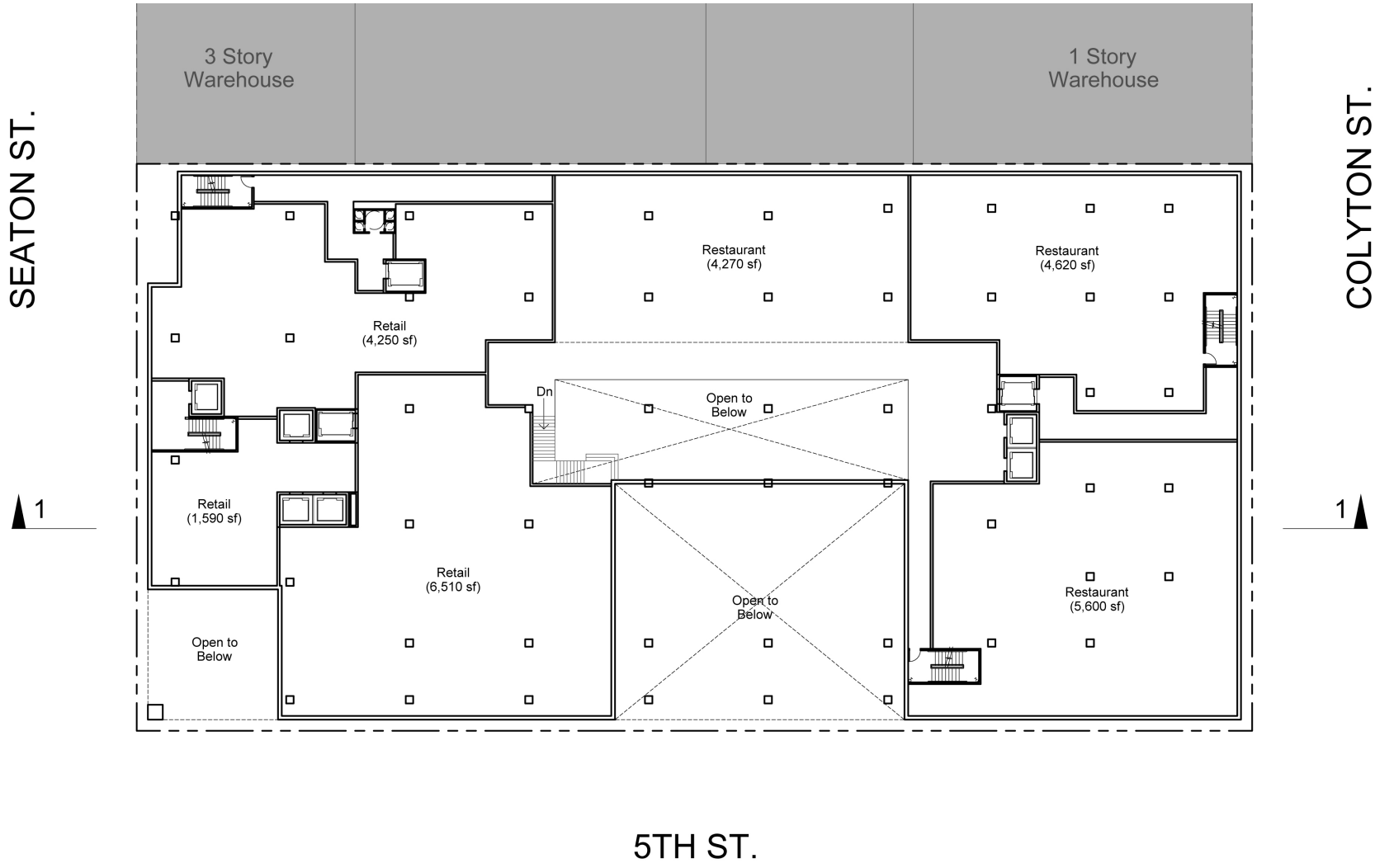
Figure 4
Proposed Site Plan



Source: Togawa Smith Martin Architects, 2016.

CAJA Environmental Services, LLC

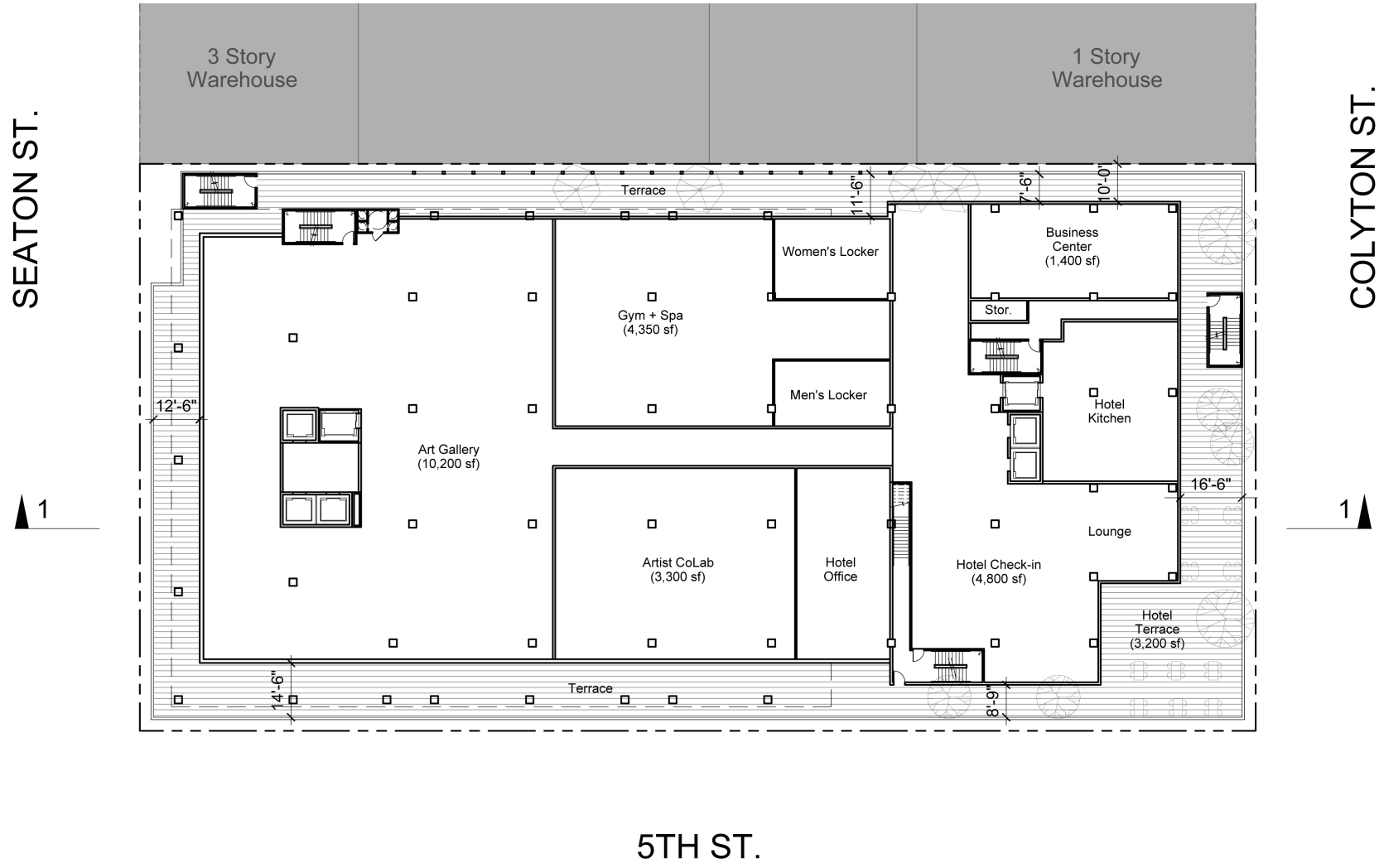
Figure 5
Ground Level Plan



Source: Togawa Smith Martin Architects, 2016.

CAJA Environmental Services, LLC

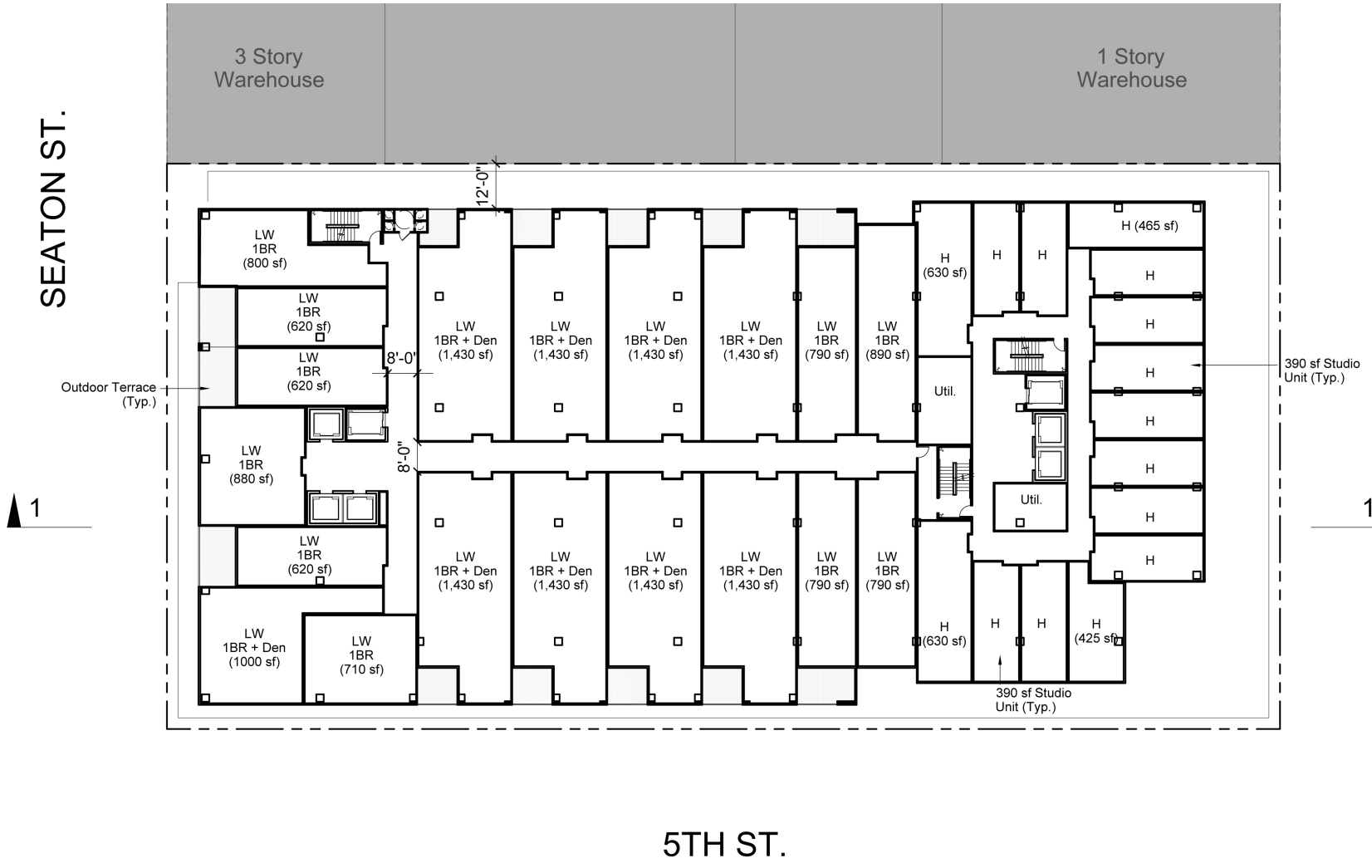
Figure 6
Second Level Plan



Source: Togawa Smith Martin Architects, 2016.

CAJA Environmental Services, LLC

Figure 7
Third Level Plan



Source: Togawa Smith Martin Architects, 2016.

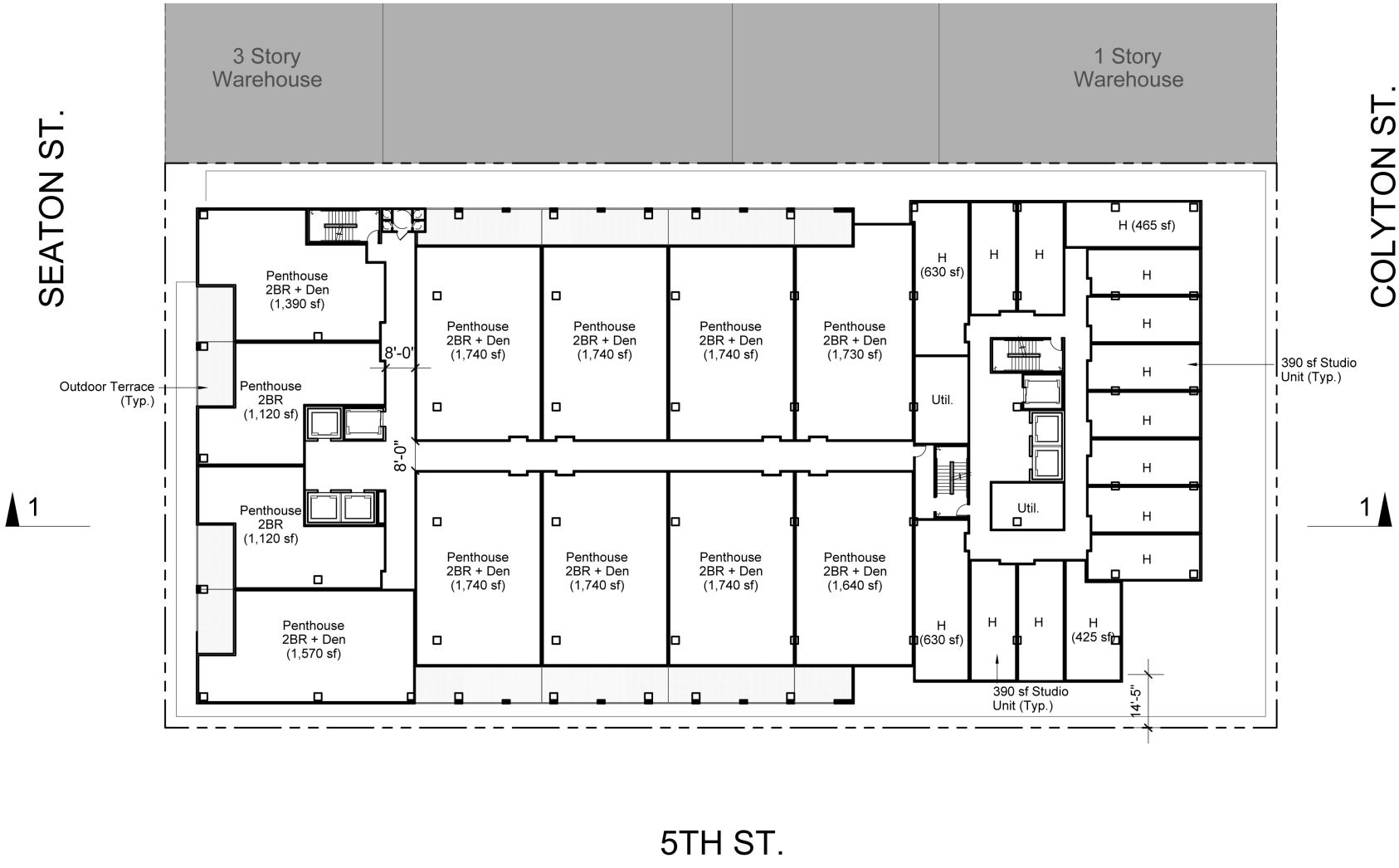
NORTH

0 15 30

Scale (Feet)

CAJA Environmental Services, LLC

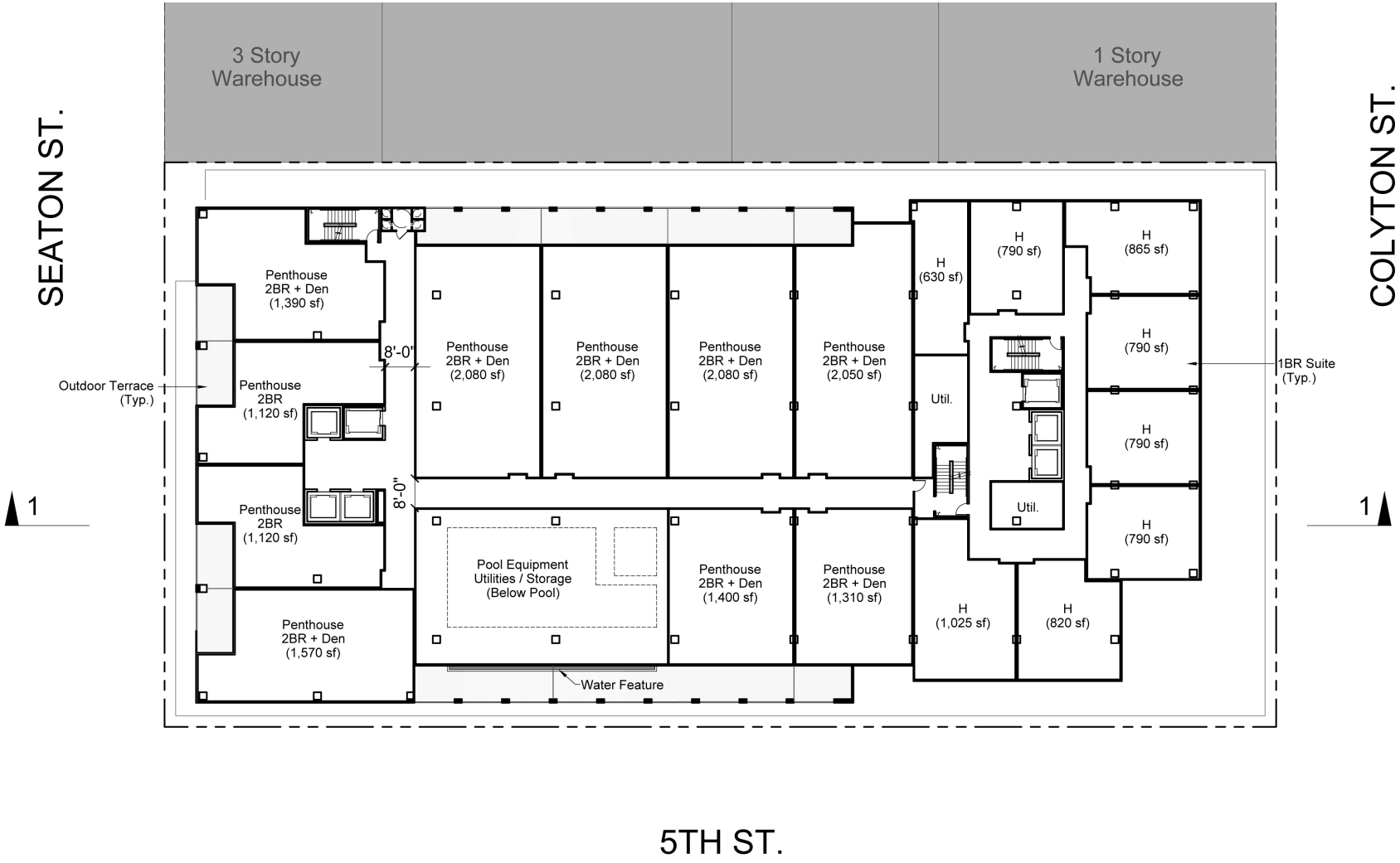
Figure 8
Fourth-Eighth Level Plan



Source: Togawa Smith Martin Architects, 2016.

CAJA Environmental Services, LLC

Figure 9
Ninth-Tenth Level Plan



Source: Togawa Smith Martin Architects, 2016.

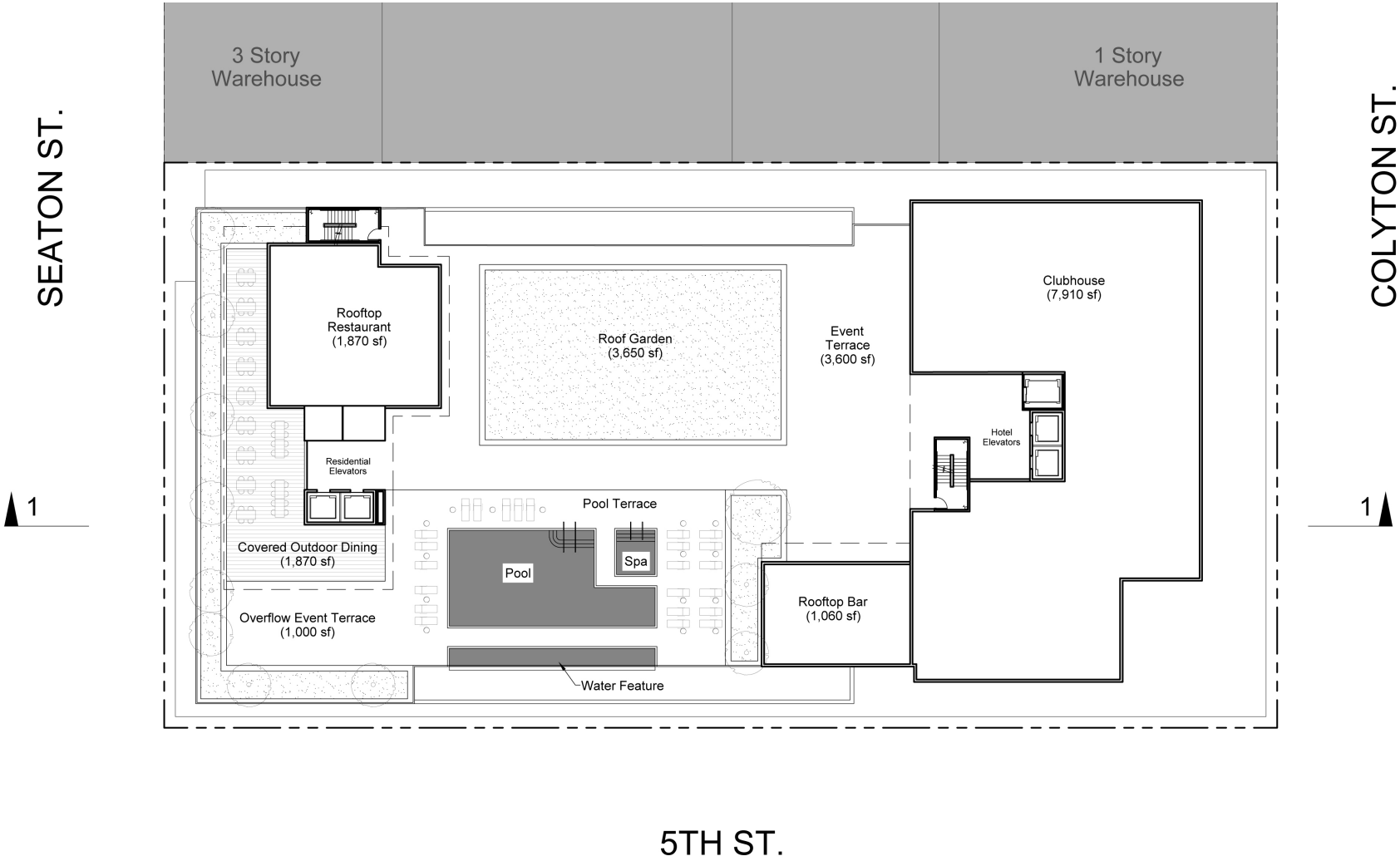
NORTH

0 15 30

Scale (Feet)

CAJA Environmental Services, LLC

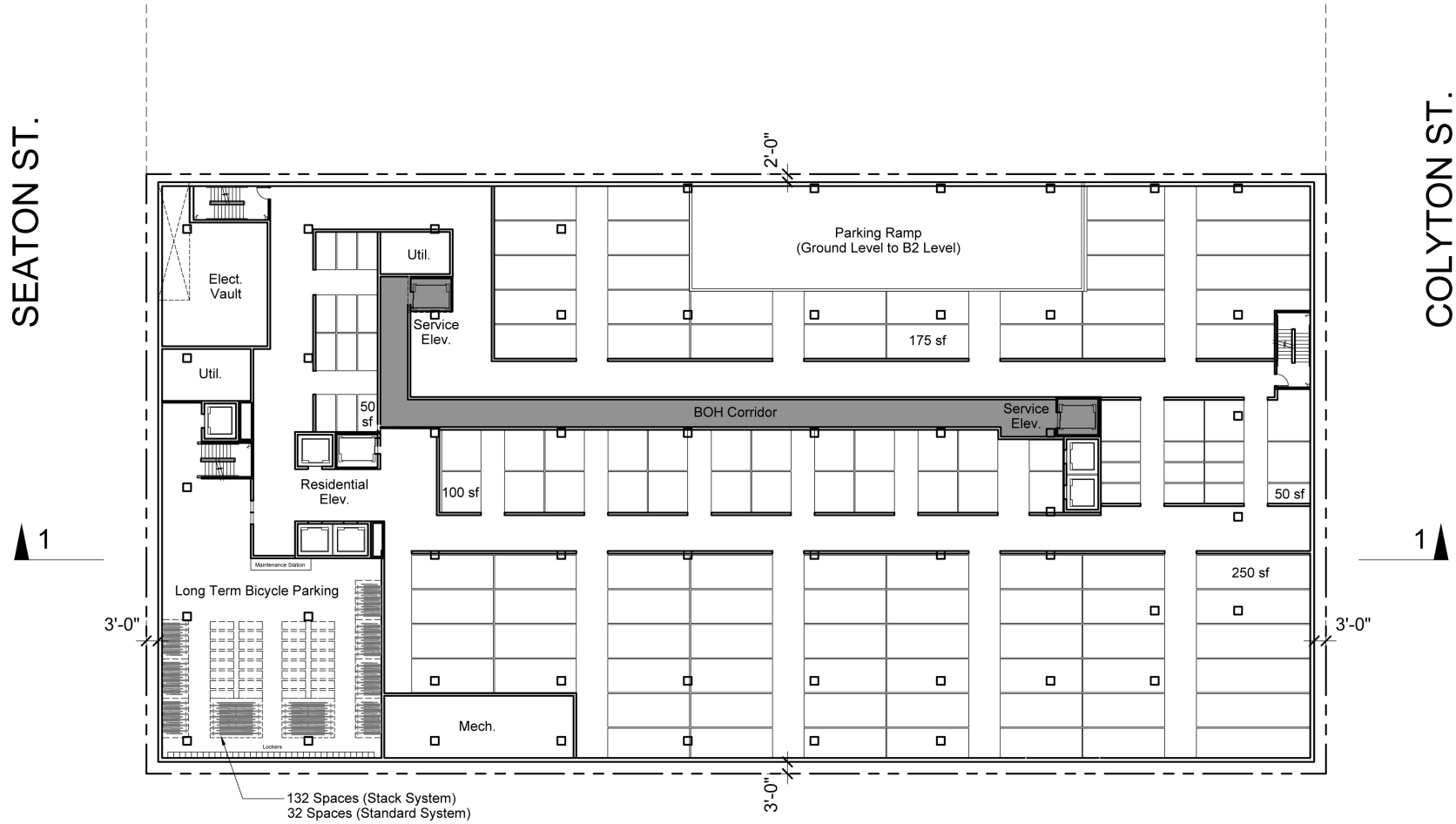
Figure 10
Eleventh Level Plan



Source: Togawa Smith Martin Architects, 2016.

CAJA Environmental Services, LLC

Figure 11
Twelfth Level Plan



NORTH

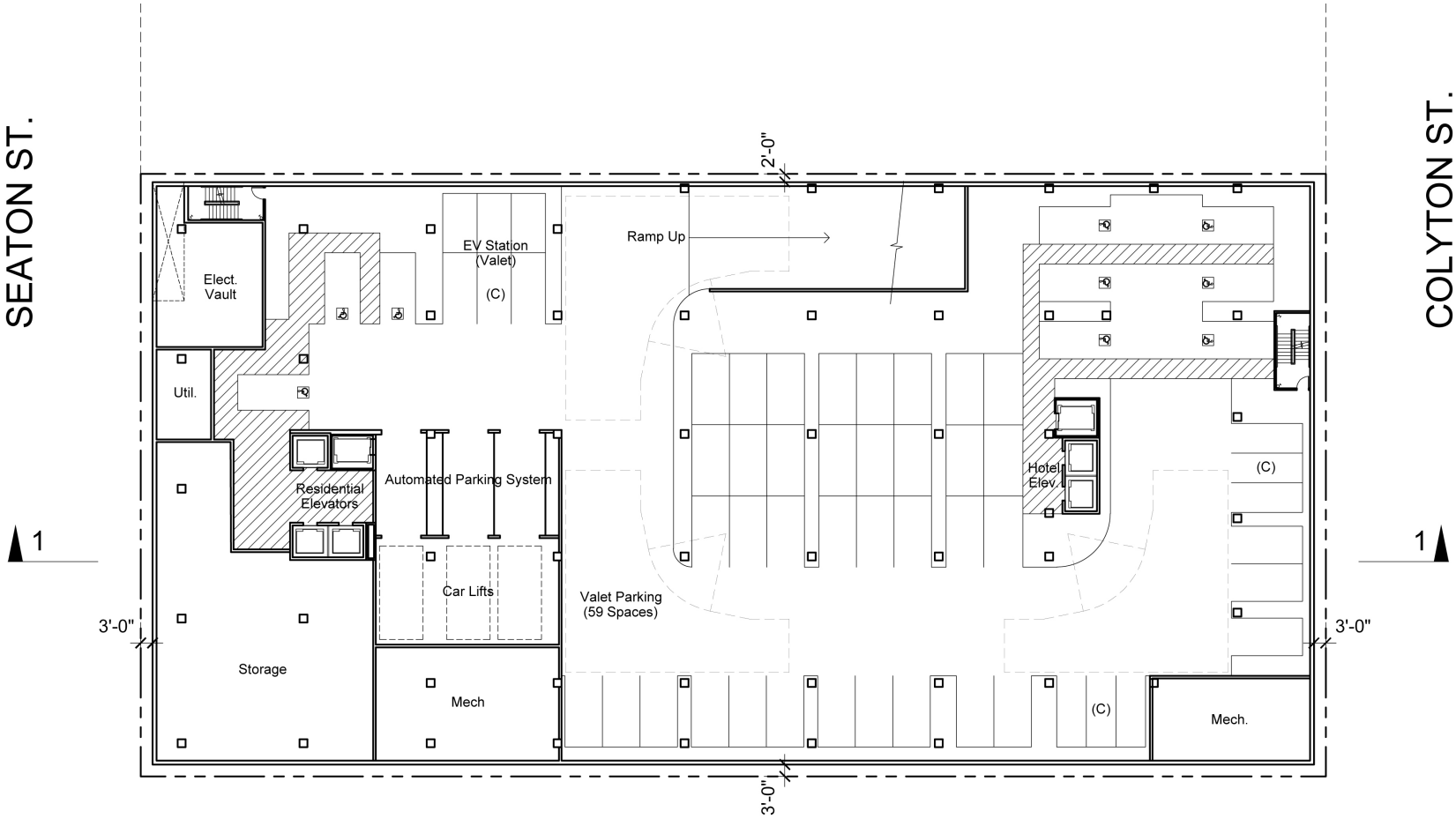
0 15 30

Scale (Feet)

Source: Togawa Smith Martin Architects, 2016.

CAJA Environmental Services, LLC

Figure 12
B1 Level Plan



Source: Togawa Smith Martin Architects, 2016.

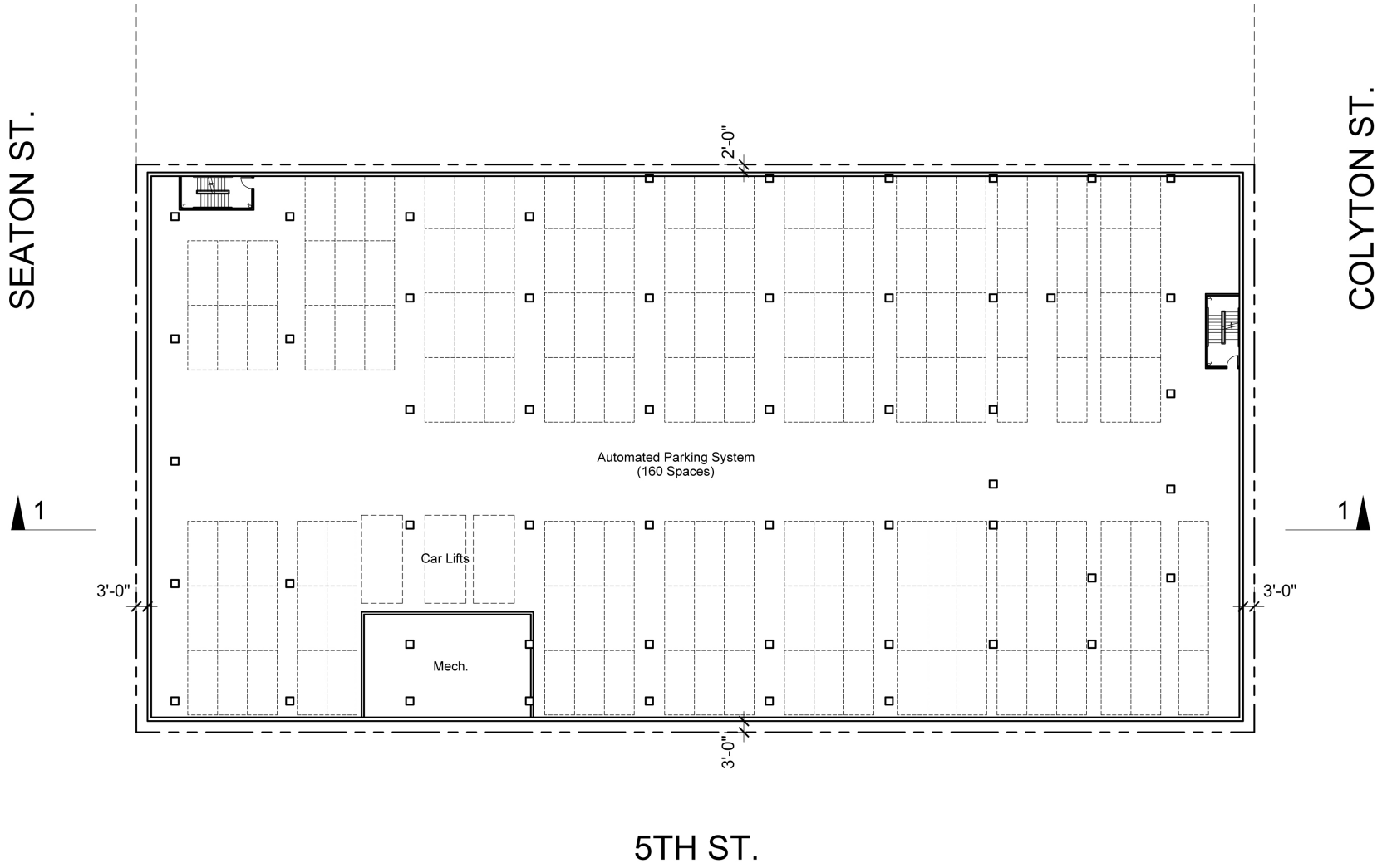
NORTH

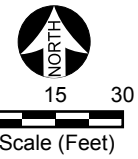
0 15 30

Scale (Feet)

CAJA Environmental Services, LLC

Figure 13
B2 Level Plan

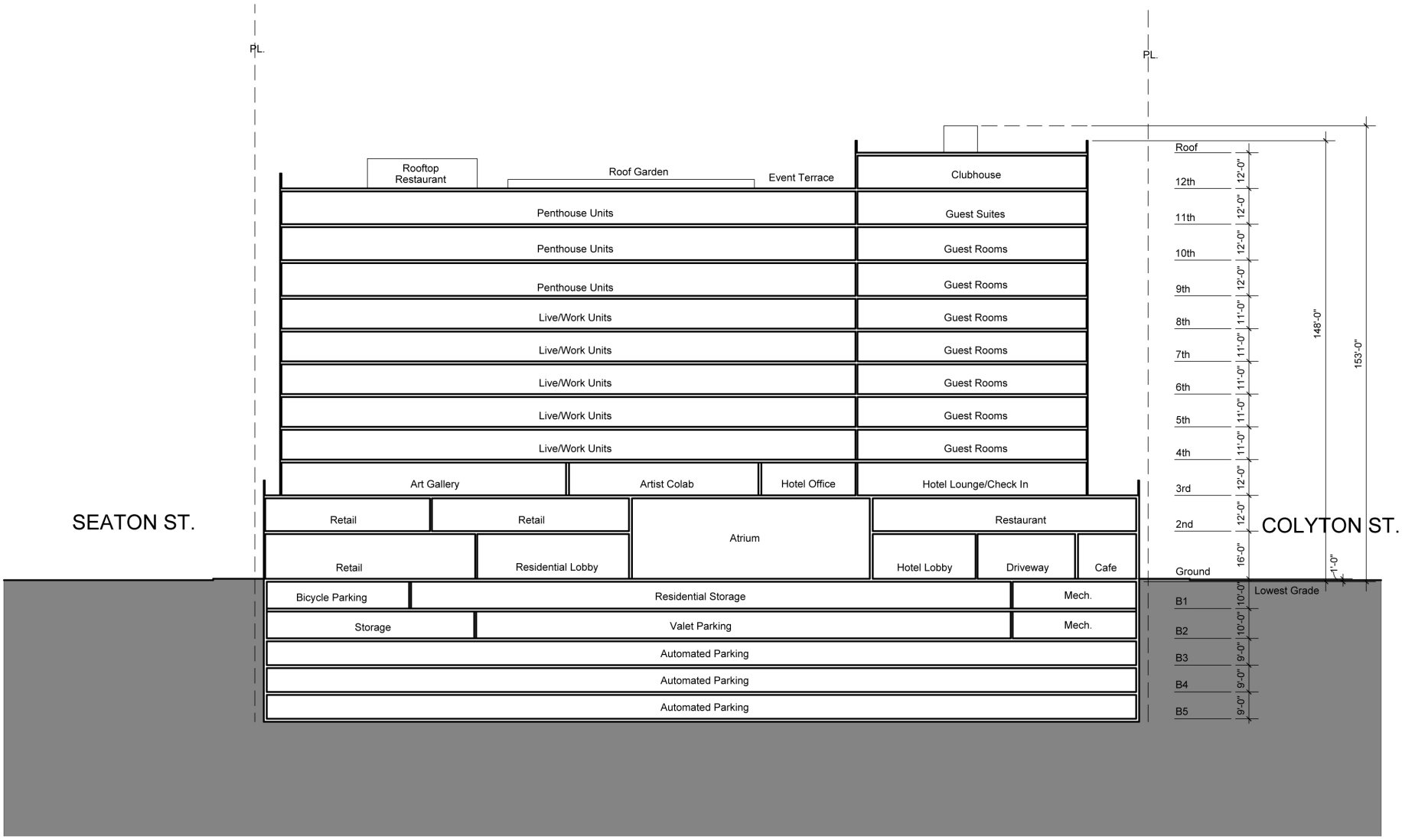




Source: Togawa Smith Martin Architects, 2016.

CAJA Environmental Services, LLC

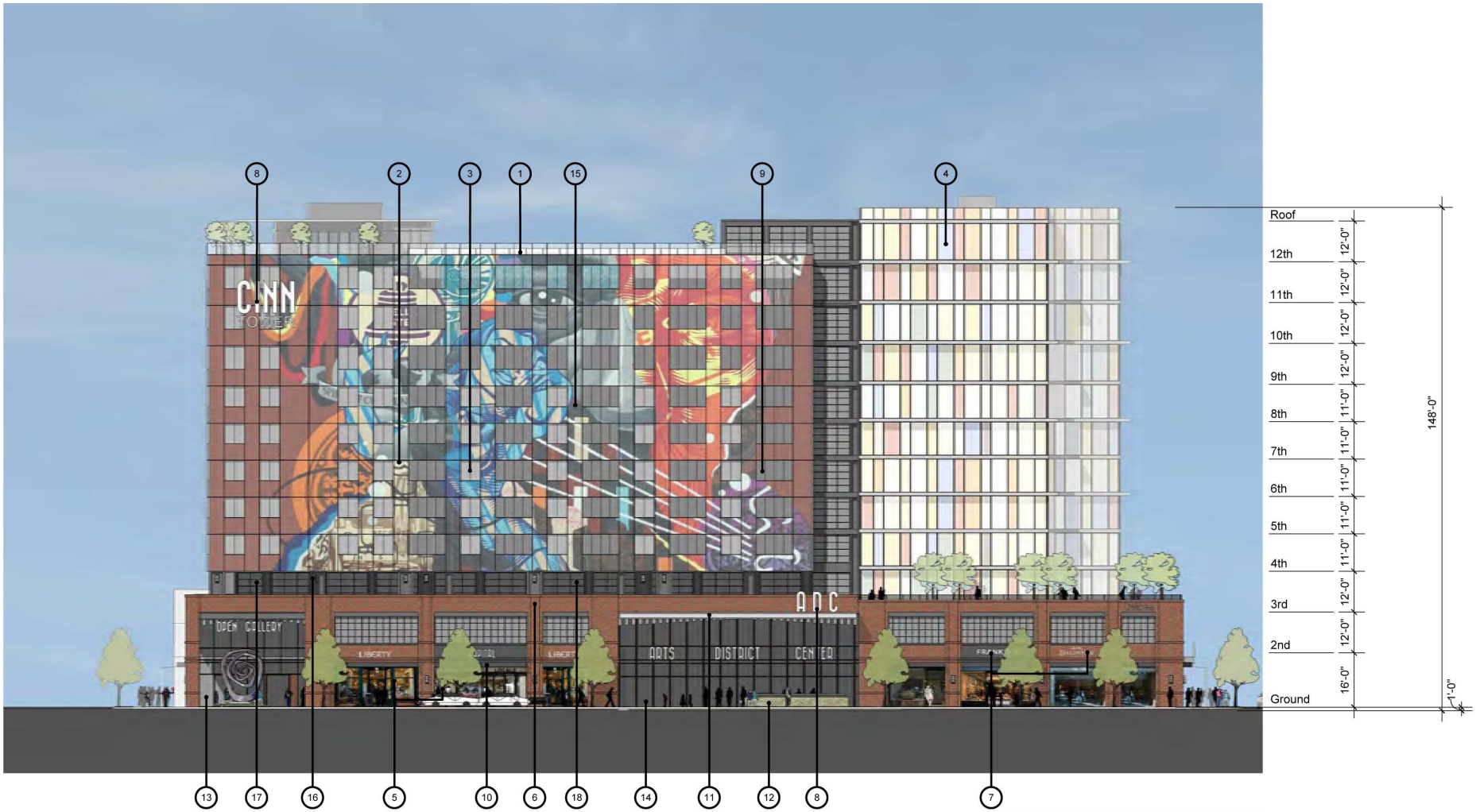
Figure 14
B3-B5 Level Plan



Source: Togawa Smith Martin Architects, 2016.

CAJA Environmental Services, LLC

Figure 15
Building Section



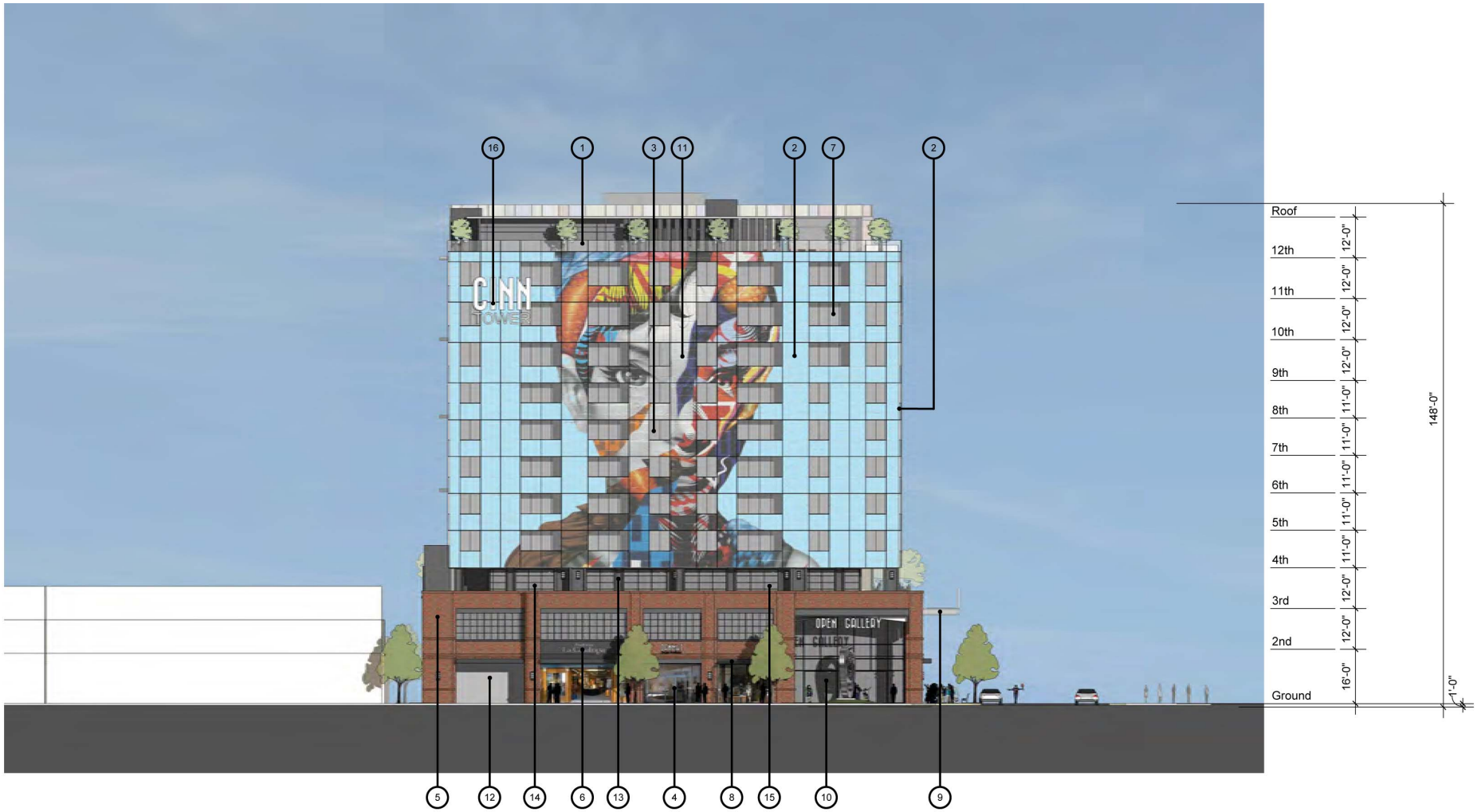
1. Glass Guardrail
2. Glass Curtain Wall
3. Residential Window
4. Window Wall Glass
5. Storefront @ Retail
6. Brick Veneer
7. Tenant Signage
8. Project Signage
9. Balcony
10. Metal Awning
11. Metal Canopy
12. Water Feature
13. Art Plaza
14. Porte Cochere
15. Artwork
16. Metal Veneer
17. Art Gallery
18. Sectional Glass Roll-up Door

NOTE: Artwork shown is a placeholder to illustrate concept only

Source: Togawa Smith Martin Architects, 2016.

CAJA Environmental Services, LLC

Figure 16
5th Street Elevation



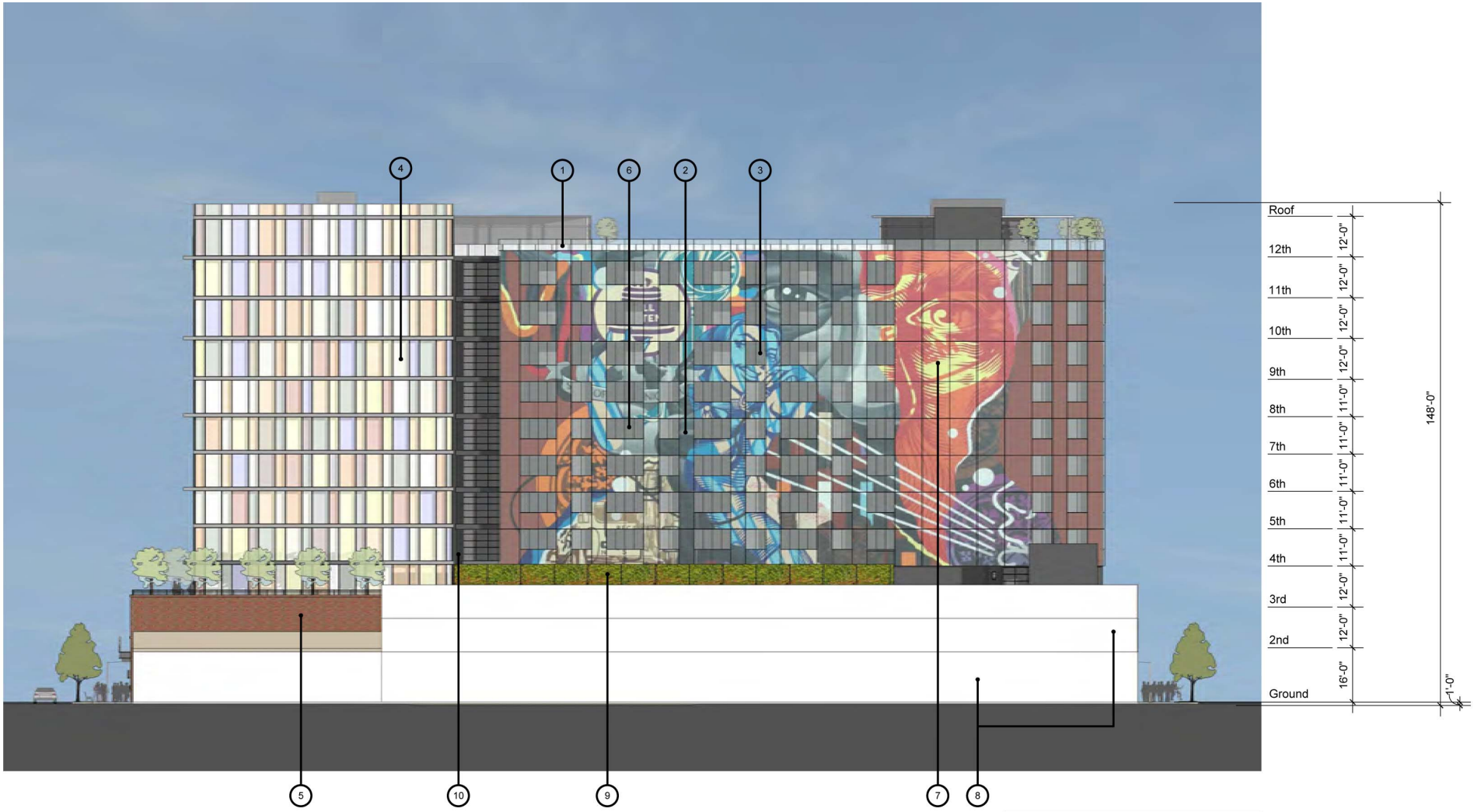
1. Glass Guardrail
2. Glass Curtain Wall
3. Residential Window
4. Commercial Storefront
5. Brick Veneer
6. Tenant Signage
7. Cantilevered Balcony
8. Metal Awning
9. Metal Canopy
10. Art Plaza
11. Artwork
12. Loading Dock
13. Metal Veneer
14. Art Gallery
15. Sectional Glass Roll-up Door
16. Project Signage

NOTE: Artwork shown is a placeholder to illustrate concept only

Source: Togawa Smith Martin Architects, 2016.

CAJA Environmental Services, LLC

Figure 17
Seaton Street Elevation



1. Glass Guardrail
2. Glass Curtain Wall
3. Residential Window
4. Window Wall Glass
5. Brick Veneer
6. Balcony
7. Artwork
8. Existing Adjacent Building
9. Landscape Screen Wall
10. Metal Veneer

NOTE: Artwork shown is a placeholder to illustrate concept only

Source: Togawa Smith Martin Architects, 2016.

CAJA Environmental Services, LLC

Figure 18
North Elevation

1. Glass Guardrail
2. Glass Curtain Wall
3. Window Wall Glass
4. Commercial Storefront
5. Brick Veneer
6. Tenant Signage
7. Project Signage
8. Metal Canopy
9. Metal Awning
10. Artwork
11. Parking Garage Entry

NOTE: Artwork shown is a placeholder to illustrate concept only

Source: Togawa Smith Martin Architects, 2016.

CAJA Environmental Services, LLC

Figure 19
Colyton Street Elevation

NOTE: Artwork shown is a placeholder to illustrate concept only

Source: Togawa Smith Martin Architects, 2016.

CAJA Environmental Services, LLC

Figure 20
Project Rendering: View Northeast From Seaton Street

NOTE: Artwork shown is a placeholder to illustrate concept only

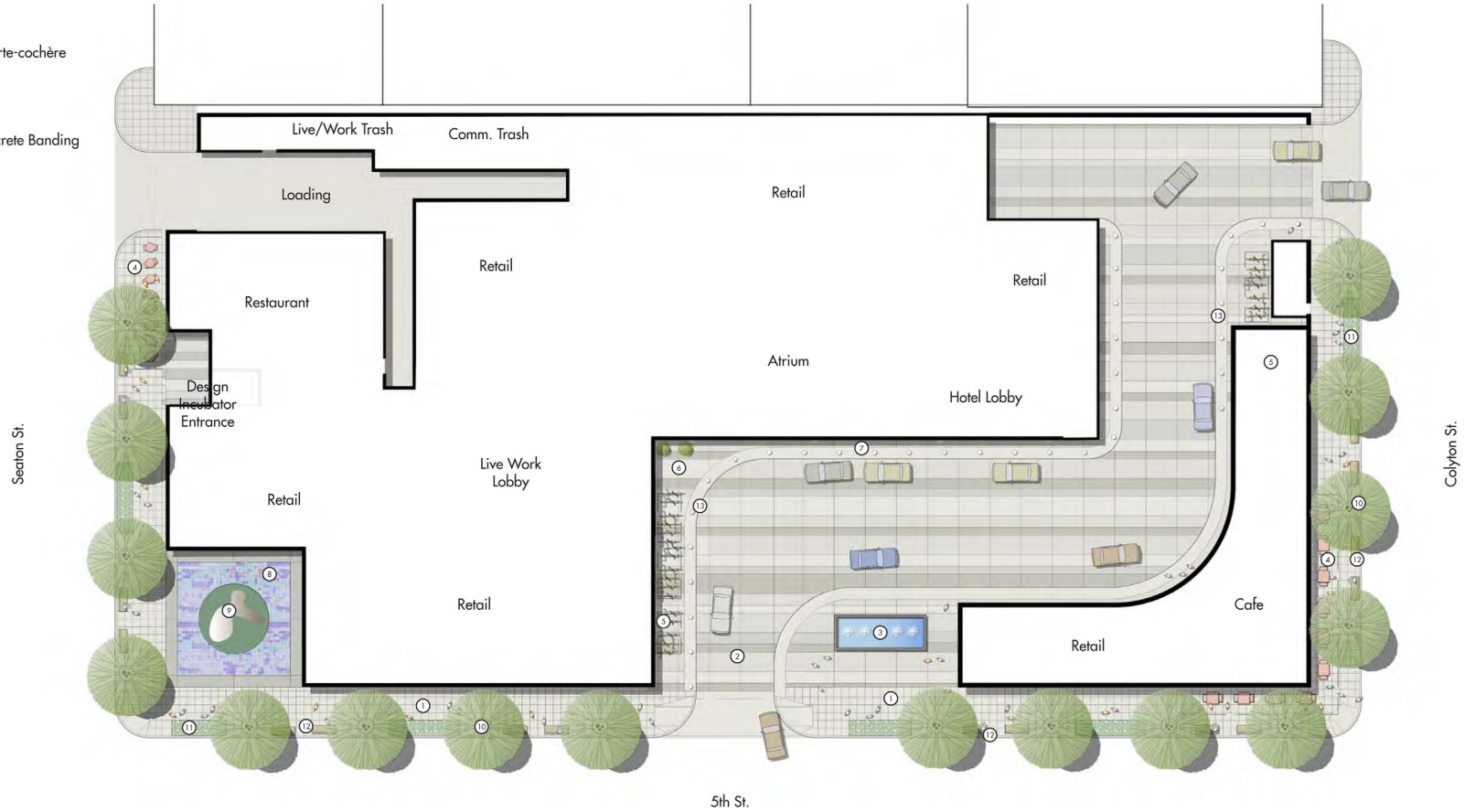
Source: Togawa Smith Martin Architects, 2016.

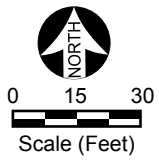
CAJA Environmental Services, LLC

Figure 21
Project Rendering: View From 5th Street/Seaton Street Intersection

LEGEND

1. Scored Concrete Sidewalk
2. Integral Colored Concrete Bands at Porte-cochère
3. Entry Fountain 220 SF
4. Outdoor Dining Tables along Sidewalk
5. Short Term Bicycle Parking
6. Entry Plaza with Integral Colored Concrete Banding
7. Hotel Entrance
8. Interactive/Kinetic Paving
9. Public Art
10. Street Tree with Metal Grate, Typical
11. Sidewalk Planter Cutout, Typical
12. Bench, Typical
13. Bollard, Typical





Source: Togawa Smith Martin Architects, 2016.

CAJA Environmental Services, LLC

Figure 22
Ground Level Landscape Design

LEGEND

① Integral Colored Concrete Tile Paving
② Raised Planter On Casters, Typical
③ Pool 25'x55'
④ Raised Spa 10'x12'
⑤ Poolside Terrace with Cabanas
⑥ Outdoor Lounge and Dining
⑦ Central Lawn (Synthetic)
⑧ Raised Rooftop Garden with Seating
⑨ Raised Planters
⑩ Water Feature

NORTH

0 15 30

Scale (Feet)

Source: Togawa Smith Martin Architects, 2016.

CAJA Environmental Services, LLC

Figure 23
Roof Level Landscape Design

2. INITIAL STUDY CHECKLIST

LEAD CITY AGENCY	COUNCIL DISTRICT	DATE
Los Angeles City Planning Department	14, Jose Huizar	March 2017

RESPONSIBLE AGENCIES

Southern California Air Quality Management District; Los Angeles Regional Water Quality Control Board

PROJECT TITLE/NO.	CASE NO. ENV-2016-4476-EIR
Arts District Center	

PREVIOUS ACTIONS CASE NO.	
N/A	❑ **DOES have significant changes from previous actions.** ❑ **DOES NOT have significant changes from previous actions.**

PROJECT DESCRIPTION:

See Section 1 (Project Description).

ENVIRONMENTAL SETTING:

See Section 1 (Project Description).

PROJECT LOCATION

1101 E. 5th Street, 445-457 South Colyton Street, 450-456 South Seaton Street, Los Angeles, CA 90013

PLANNING DISTRICT	STATUS:
Central City North Community Plan Area	❑ **PRELIMINARY** ❑ **PROPOSED** ■ **ADOPTED 2003**

EXISTING ZONING	MAX. DENSITY ZONING	❑ DOES CONFORM TO PLAN
M3-1-RIO	C2-2	
PLANNED LAND USE & ZONE	**MAX. DENSITY PLAN**	■ DOES NOT CONFORM TO PLAN
Regional Center Commercial; C2-2-RIO	N/A	
SURROUNDING LAND USES	**PROJECT DENSITY**	❑ NO DISTRICT PLAN
Hotel, residential, commercial/retail, restaurant, art gallery	Proposed Floor-Area Ratio: 8.1:1	

DETERMINATION (To be completed by Lead Agency)

On the basis of this initial evaluation:

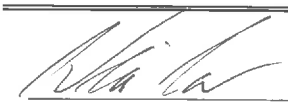
☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ 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.



Signature

City Planning Associate

Title

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 a project like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less that significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

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

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

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

    2) 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.

    3) 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:

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

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

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

INITIAL STUDY CHECKLIST (To be completed by the Lead City Agency)

BACKGROUND

PROPONENT NAME	**PHONE NUMBER**
Arts District Development, LLC	213-261-3727

PROPONENT ADDRESS

1129 E. 5th Street, Los Angeles, CA 90013

AGENCY REQUIRING CHECKLIST	**DATE SUBMITTED**
City of Los Angeles Planning Department	March 2017

ENVIRONMENTAL IMPACTS (Explanations of all potentially and less than significant impacts are required to be attached on separate sheets)

		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-designated 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?	■	❑	❑	❑

Response a:

A significant impact would occur if a proposed project introduces incompatible visual elements within a field of view containing a scenic vista or substantially blocks a scenic vista. As described in the City of Los Angeles CEQA Thresholds Guide, panoramic views or vistas provide visual access to a large geographic area, for which the field of view can be wide and extend into the distance. Panoramic views are usually associated with vantage points looking out over a section of urban or natural area, which provide a geographical orientation not commonly available. Examples of panoramic views might include an urban skyline, valley, mountain range, the ocean, or other water bodies. The Project Site is in an urbanized portion of Los Angeles, and topographically relatively flat. The Project would construct a new 148-foot tall building, thus substantially increasing the building heights on the Site from the existing two-story structure, having a potential adverse effect on a scenic vista. Therefore, this potential impact will be analyzed in the EIR.

Response b:

A significant impact would occur only where scenic resources would be damaged or removed by a project. The Project Site does not contain trees with scenic significance or rock outcroppings and is not located within a state scenic highway. The Project Site has been identified by SurveyLA as a potential contributor to a historic district. Therefore, the Proposed Project could have a potential impact on a potential historic resource and this potential will be analyzed in the EIR, as discussed in response to Checklist Question V.a.

Response c:

A significant impact may occur if a project introduces incompatible visual elements on the Project Site or visual elements that would be incompatible with the character of the area surrounding the area. The Project would increase the building heights on the Site from existing uses and would introduce new architectural elements to the area. Therefore, this issue will be analyzed in the EIR.

Response d:

A significant impact may occur if a project introduces new sources of light or glare on the Project Site which would be incompatible with the areas surrounding the Site or which pose a safety hazard, such as to motorists utilizing adjacent streets.

Artificial Light

An adverse impact would occur if the Project created a substantial new source of artificial light that would adversely affect the surrounding area. Artificial light may be generated from individual (i.e., point) sources as well as from indirect sources of reflected light. Uses such as residences, hospitals, and hotels are considered light sensitive since they are typically occupied by persons who are subject to disturbance by bright light sources during evening hours. The Project Site is located in a well-lit urban portion of Los Angeles where there are high levels of ambient nighttime lighting including street lighting, architectural and security lighting, exterior signage, and indoor building illumination (light emanating from the interior of structures which passes through windows), all of which are common to densely populated areas. Nevertheless, aesthetic impacts to the nearby residential properties may result due to excessive illumination at the Project Site. Therefore, this issue will be analyzed further in the EIR.

Glare

An adverse impact would occur if the Project created a substantial new source of glare that would adversely affect day or nighttime views in the area. Glare is a common phenomenon in the southern California area due mainly to the occurrence of a high number of days per year with direct sunlight and the highly urbanized nature of the region, which results in a large concentration of potentially reflective surfaces. Potential reflective surfaces in the Project vicinity include automobiles traveling and parked on streets in the vicinity of the project, exterior building windows, and surfaces of brightly painted buildings in the project vicinity. Excessive glare not only restricts visibility but increases the ambient heat reflectivity in a given area. The potential exists for glass or other shiny building materials to cause glare impacts at nearby residential uses. Therefore, this issue will be analyzed further in the EIR.

Shade/Shadow

The analysis of the Project's potential shade/shadow impacts focuses on changes in shading conditions for those off-site uses and activities that are dependent on access to natural light. Off-site uses and activities that meet this criteria include routinely used outdoor spaces associated with residential, recreational, or institutional uses (pre-schools, schools, nursing homes); or commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas; and existing solar collectors. The Project would construct a new 148-foot tall building on the Site. The City of Los Angeles requires a shade/shadow

evaluation for any new building over 60 feet in height.[3] Therefore, a shade/shadow analysis will be included in the EIR.

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
II.	**Agricultural And Forestry Resources.** In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest Range and 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:				
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 the existing zoning for agricultural use, or a Williamson Act Contract?	❑	❑	❑	■
c.	Conflict with existing zoning for, or cause rezoning of, forest land (as defined by Public Resources Code section 122220(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	❑	❑	❑	■

[3] *City of Los Angeles, CEQA Thresholds Guide, 2006, Section A (Aesthetics and Visual Resources), Part 4.*

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Farmland, to non-agricultural use or conversion of forest land to non-forest use?				

Responses a-e:

A significant impact may occur if a project were to result in the conversion of state-designated agricultural land from agricultural use to another non-agricultural use, the conversion of land zoned for agricultural use or under a Williamson Act contract from agricultural use to another non-agricultural use, results in the rezoning of forest land or timberland, or involves other changes in the existing environment which, could result in conversion of Farmland to non-agricultural use. The Project Site is currently developed with a building and is in a highly urbanized area. The Site does not contain any agricultural uses, and is not delineated as such on any maps prepared pursuant to the Farmland Mapping and Monitoring Program.[4] The Site is zoned manufacturing. No Williamson Act Contract applies to the Site. Therefore, no impact would occur. Further evaluation of this issue in an EIR is not required.

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
III.	**Air Quality.** The significance criteria established by the South Coast Air Quality Management District (SCAQMD) 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?	■	❑	❑	❑

[4] *State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, website: ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2006/los06.pdf, March 8, 2016.*

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Create objectionable odors affecting a substantial number of people?	❑	❑	■	❑

Response a:

A significant impact may occur if a project is not consistent with the applicable Air Quality Management Plan (AQMP) or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of that plan. The Project Site is located within the 6,600 square mile South Coast Air Basin (Basin). The South Coast Air Quality Management District (SCAQMD) is required, pursuant to the Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in non-attainment (i.e., ozone [1-hour and 8-hour standards], PM_{10}, and $PM_{2.5}$). As such, the Project would be subject to the SCAQMD's AQMP. The 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.[5] With regard to air quality planning, SCAG has prepared the Regional Comprehensive Plan and Guide (RCPG), which includes Growth Management and Regional Mobility chapters that form the basis for the land use and transportation control portions of the AQMP, and are utilized in the preparation of the air quality forecasts and consistency analysis included in the AQMP. Both the RCPG and AQMP are based, in part, on growth projections originating from the City's General Plan.

A significant impact may occur if the Project is inconsistent with the growth assumptions upon which the AQMP was based. As a result, Project development could have an adverse effect on the SCAQMD's implementation of the AQMP. Therefore, this issue will be analyzed further in the EIR.

Response b:

A project would result in a significant air quality impact if project-related emissions exceed federal, state or regional standards or thresholds, or if project-related emissions would substantially contribute to an existing or projected air quality violation. Construction and operation of the Project would result in an increase in uses which has the potential to generate emissions which could exceed federal, state, or regional standards or thresholds or contribute to an existing or projected air quality violation. Therefore, this issue will be analyzed further in the EIR.

[5] *SCAG is the federally designated metropolitan planning organization (MPO) for the southern California region.*

Response c:

A significant impact would occur if a project would result in a cumulatively considerable net increase in a federal or state non-attainment pollutant. With regard to determining the significance of the Project's contribution to regional emissions, the SCAQMD recommends that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project specific impacts. Therefore, according to the SCAQMD, an individual project that generates construction or operational emissions that exceed the SCAQMD recommended daily thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment. The Project has the potential to add a cumulatively considerable contribution to a federal or state non-attainment pollutant. Therefore, this issue will be analyzed further in the EIR.

Response d:

A significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors. Land uses that are considered more sensitive to air pollution than others include hospitals, schools, residences, playgrounds, childcare centers, athletic facilities, and retirement homes.[6] Sensitive receptors in the Project vicinity include residences to the east along Hewitt and Palmetto Streets. The Project could expose these sensitive receptors to substantial pollutant concentrations during construction and operation. Therefore, this issue will be analyzed further in the EIR.

Response e:

A significant impact would only occur if a project would generate substantial odors. The SCAQMD's *CEQA Air Quality Handbook* identifies those land uses that are associated with odor complaints, which typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project does not include any of the uses identified by the SCAQMD as being associated with odors. While the Project does include restaurant uses, compliance with industry standard odor control practices, SCAQMD Rule 402 (Nuisance), and SCAQMD Best Available Control Technology Guidelines would limit potential objectionable odor impacts during the Project's long-term operations phase to a less than significant level.

Potential sources that may emit odors during construction activities include the use of architectural coatings and solvents as well as asphalt paving. SCAQMD Rules 1108 and 1113 limit the amount of volatile organic compounds from cutback asphalt and architectural coatings and solvents, respectively. Via mandatory compliance with SCAQMD Rules, no construction activities or materials are proposed which would create a significant level of objectionable odors and would limit potential objectionable odor impacts during the Project's short-term construction phase to a less than significant level. Therefore, further evaluation of this issue is not required.

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[6] *South Coast Air Quality Management District, CEQA Air Quality Handbook, Figure 5-1, April 1993.*

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. Biological Resources. Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	❑	❑	❑	■
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. 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 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?	❑	❑	❑	■

Response a:

A significant impact would occur if a project would remove or modify habitat for any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulation, or by the state or federal regulatory agencies cited above. The Project Site is located in an urbanized area of Los Angeles and is currently developed with a building, paving, and no landscaping. The Site does not contain any natural open spaces, act as a wildlife corridor, nor possess any areas of significant biological resource value. No hydrological features are present on the Site and there are no sensitive

habitats present. Due to the lack of biotic resources, no candidate, sensitive, or special status species identified in local plans, policies, regulations, by the California Department of Fish and Game (CDFG), the California Native Plant Society (CNPS), or the U.S. Fish and Wildlife Service (USFWS) would be expected to occur on the Site. Therefore, no impact would occur and no mitigation measures would be required. Further evaluation of this issue in an EIR is not required.

Response b:

A significant impact would occur if riparian habitat or any other sensitive natural community identified locally, regionally, or by the state and federal regulatory agencies cited would be adversely modified by a project. There are no riparian areas located on or adjacent to the Project Site.[7] Therefore, no impact would occur. Further evaluation of this issue in an EIR is not required.

Response c:

A significant impact would occur if federally protected wetlands, as defined by Section 404 of the Clean Water Act, would be modified or removed by a project. Review of the National Wetlands Inventory identified no wetlands or water features on the Project Site.[8] Therefore, no impact would occur. Further evaluation of this issue in an EIR is not required.

Response d:

A significant impact would occur if a project would interfere or remove access to a migratory wildlife corridor or impede the use of native wildlife nursery sites. The Project Site is developed with an existing building and other hard surfaces and currently does not interfere substantially with the movement of any native resident or migratory birds. The Site is located within an urban area that is highly disturbed and which contains numerous high-rise buildings. The nearest location that contains vegetation with the potential for supporting migratory bird and/or wildlife use is the Los Angeles River, located approximately 1,500 feet to the east. The Project would develop a 148-foot building on the Site. Although buildings of this height could potentially interfere with bird movement, the presence of several buildings of a similar height in the immediate vicinity would generally act as a discouragement to major bird migration. No trees are present on the Project Site to provide nesting or perching spots for birds. No bodies of water exist on the Site to provide habitat for fish. As such, Project implementation would neither interfere with the movement of native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors nor would it impede the use of native wildlife nursery sites. Therefore, no impact would occur and further evaluation of this issue in an EIR is not required.

Response e:

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[7] *NavigateLA, Water, Lakes, and Streams layer: http://navigatela.lacity.org/navigatela/, November 11, 2016.*

[8] *U.S. Fish & Wildlife Service, National Wetlands Inventory: http://www.fws.gov/wetlands/data/mapper.HTML*

A significant adverse impact would occur if a project were inconsistent with local regulations pertaining to biological resources. The Project would be confined to a previously developed site and would not involve substantial changes in the existing environment. Local ordinances protecting biological resources are limited to the City of Los Angeles Protected Tree Ordinance, as modified by Ordinance 177404. The amended Protected Tree Ordinance provides guidelines for the preservation of all Oak trees indigenous to California (excluding the Scrub Oak or *Quercus dumosa*) as well as the following tree species: Southern California Black Walnut (*Juglans californica var. californica*); Western Sycamore (*Platanus racemosa*); and California Bay (*Umbellularia californica*).[9] No City-protected trees, or trees of any type are present on the Project Site. Therefore, no impact would occur and further evaluation of this issue in an EIR is not required.

Response f:

A significant impact would occur if a project would be inconsistent with policies in any draft or adopted conservation plan. The Project Site is located in an urbanized area of Los Angeles and is currently developed with buildings and paving, and contains no landscaping. The Site is not located in or adjacent to an existing or proposed Significant Ecological Area.[10] Additionally, there is no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan that applies to the Project Site. The Project would not conflict with any habitat conservation plans. Therefore, no impact would occur and further evaluation of this issue in an EIR is not required.

		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 CEQA Section 15064.5?	■	❑	❑	❑
b.	Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Section 15064.5?	❑	❑	■	❑
c.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	❑	❑	■	❑
d.	Disturb any human remains, including those interred outside of formal cemeteries?	❑	❑	■	❑

[9] *City of Los Angeles, Ordinance 177404, approved March 13, 2006 and effective April 23, 2006.*

[10] *NavigateLA, Significant Ecological Area layer: http://navigatela.lacity.org/navigatela/, November 11, 2016.*

Response a:

Section 15064.5 of the State CEQA Guidelines defines an historical resources as: 1) a resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources; 2) a resource listed in a local register of historical resources or identified as significant in an historical resource survey meeting certain state guidelines; or 3) an object, building, structure, site, area, place, record or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record. A project-related significant adverse effect would occur if the proposed project were to adversely affect a historical resource meeting one of the above definitions.

The State Office of Historic Preservation recommends that properties over 45 years of age be evaluated for their potential as historic resources. The existing structure on the Project Site was built in approximately 1915 and has been identified as a potential contributor to a potential historic industrial district by SurveyLA. This issue will be analyzed in the EIR.

Response b:

Section 15064.5 of the State CEQA Guidelines defines significant archaeological resources as resources which met the criteria for historical resources, as discussed above, or resources which constitute unique archaeological resources. A project-related significant adverse effect could occur if the Project was to affect archaeological resources which fall under either of these categories. The Project Site and immediately surrounding areas do not contain any known archaeological sites or archaeological survey areas.[11] The Project Site is located in a highly urbanized area of the Central City North Community Plan Area of the City of Los Angeles, and has been disturbed by past development activities. The Project includes subgrade preparation and excavation for the five-level subterranean parking garage. Thus, the potential exists for the accidental discovery of unknown archaeological materials. Because the presence or absence of such materials cannot be determined until the Site is excavated, periodic monitoring during construction is required to identify any previously unidentified archaeological resources uncovered by Project construction activity.

Under California Public Resources Code Section 21083.2, development projects that involve excavations are required to implement the following measures:

- If any archaeological materials are encountered during the course of Project development, all further development activity in the vicinity of the materials shall halt and:
    - The services of an archaeologist shall then be secured by contacting the South Central Coastal Information Center (657-278-5395) located at California State University

[11] *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Prehistoric and Historic Archaeological Sites and Survey Areas in the City of Los Angeles, September 1996.*

Fullerton, or a member of the Society of Professional Archaeologist (SOPA) or a SOPA-qualified archaeologist, who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact;

- The archaeologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource; and
- The Applicant shall comply with the recommendations of the evaluating archaeologist, as contained in the survey, study or report.

- Project development activities may resume once copies of the archaeological survey, study or report are submitted to:

  SCCIC Department of Anthropology
  McCarthy Hall 477
  CSU Fullerton
  800 North State College Boulevard
  Fullerton, CA 92834

- Prior to the issuance of any building permit, the Applicant shall submit a letter to the case file indicating what, if any, archaeological reports have been submitted, or a statement indicating that no material was discovered.
- A covenant and agreement binding the Applicant to this condition shall be recorded prior to the issuance of a grading permit.

Compliance with these requirements would ensure that the Project would have a less than significant impact with respect to archaeological resources and no further evaluation of this issue in an EIR is required.

Response c:

A project-related significant adverse effect could occur if grading or excavation activities associated with the proposed project would disturb paleontological resources or geologic features which presently exist within the Project Site. The Project site is located in the Central City North Community Plan Area of the City of Los Angeles, and as described above, the Project Site has been previously graded and is currently developed. The Project Site and immediate surrounding areas do not contain any known vertebrate paleontological resources.[12] Although no paleontological resources are known to exist on-site, there is a possibility that paleontological resources exist at sub-surface levels on the Project Site and may be uncovered during subgrade excavation for the parking garage.

[12] *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Vertebrate Paleontological Resources in the City of Los Angeles, September 1996.*

Under California Public Resources Code Sections 5097.5 and 30244, development projects that involve excavations are required to implement the following measures:

- If any paleontological materials are encountered during the course of project development, all further development activities in the vicinity of the materials shall halt and:
    - The services of a paleontologist shall then be secured by contacting the Center for Public Paleontology - USC, UCLA, California State University Los Angeles, California State University Long Beach, or the Los Angeles County Natural History Museum - who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact;
    - The paleontologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource;
    - The Applicant shall comply with the recommendations of the evaluating paleontologist, as contained in the survey, study or report; and
    - Project development activities may resume once copies of the paleontological survey, study or report are submitted to the Los Angeles County Natural History Museum.
- Prior to the issuance of any building permit, the Applicant shall submit a letter to the case file indicating what, if any, paleontological reports have been submitted, or a statement indicating that no material was discovered.
- A covenant and agreement binding the applicant to this condition shall be recorded prior to issuance of a grading permit.

Compliance with these requirements would ensure that, if any such resources are found during construction of the Project, they would be handled according to the proper regulations, and impacts to potential paleontological resources that may exist beneath the Project Site would be less than significant. No further evaluation of this issue in an EIR is required.

Response d:

A project-related significant adverse effect could occur if grading or excavation activities associated with proposed project would disturb previously interred human remains. The Project Site is located in a heavily urbanized area, and developed with an existing building. The likelihood of encountering human remains on the Project Site is minimal. However, during the construction phase and excavation of the subterranean parking levels, there is a possibility that human remains could be encountered, and if proper care is not taken during construction, damage to or destruction of these unknown remains could occur.

Under California Health and Safety Code Section 7050.5 and Native American Heritage Commission (NAHC) regulations (Public Resource Code Section 5097), development projects that involve excavations are required to implement the following measure:

- In the event that human remains are discovered during excavation activities, the following procedure shall be observed:
    - Stop excavation immediately in the vicinity of the remains and contact the County Coroner at:

      1104 N. Mission Road
      Los Angeles, CA 90033
      323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or
      323-343-0714 (After Hours, Saturday, Sunday, and Holidays)

    - The coroner has two working days to examine human remains after being notified by the responsible person. If the remains are Native American, the Coroner has 24 hours to notify the Native American Heritage Commission;
    - The Native American Heritage Commission will immediately notify the person it believes to be the most likely descendent of the deceased Native American;
    - Project development activities may resume once copies of the paleontological survey, study or report are submitted to the Los Angeles County Natural History Museum.
    - The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods;
    - If the most likely descendent does not make recommendations within 48 hours, the Applicant shall reinter the remains in an area of the property secure from further disturbance, or;
    - If the Applicant does not accept the most likely descendant's recommendations, the owner or the descendent may request mediation by the Native American Heritage Commission.

Through compliance with these requirements, potential Project impacts related to the disturbance of unknown human remains would be less than significant. No further evaluation of this issue in an EIR is required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. Geology and Soils. Would the project:				
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	■	❑	❑	❑
ii. Strong seismic ground shaking?	■	❑	❑	❑
iii. Seismic-related ground failure, including liquefaction?	■	❑	❑	❑
iv. Landslides?	❑	❑	■	❑
b. Result in substantial soil erosion or the loss of topsoil?	❑	❑	■	❑
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	■	❑	❑	❑
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	■	❑	❑	❑
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	❑	❑	❑	■

Response a.i:

Fault rupture is defined as the surface displacement that occurs along the surface of a fault during an earthquake. Based on criteria established by the California Geological Survey (CGS), faults can be classified as active, potentially active, or inactive. Active faults may be designated as Earthquake Fault Zones under the Alquist-Priolo Earthquake Fault Zoning Act, which includes standards regulating development adjacent to active faults. In addition, the City of Los Angeles designates Fault Rupture Study Zones on each side of active and potentially active faults to establish areas of hazard potential.

There are several principal active faults in the metropolitan region. The greatest of these is the San Andreas Fault, approximately 35 miles (55 kilometers) northwest of downtown Los Angeles, on the other side of the San Gabriel Mountains. Several other important active faults lie closer to and even within the populated

area of greater Los Angeles. These include the Sierra Madre fault zone, which runs through parts of Altadena and other foothills communities, the Raymond Fault in San Marino, and the Hollywood and Santa Monica Faults along the southern edge of the Hollywood Hills and Santa Monica Mountains.

The Site is not within an Alquist-Priolo Fault Zone or a Fault Rupture Study Zone.[13] The Project would comply with the CGS *Special Publications 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California* (1997), which provides guidance for evaluation and mitigation of earthquake-related hazards, and with seismic safety requirements in the UBC and the LAMC. Nonetheless, as the Site is located in a seismically active region, potential impacts associated with fault rupture will be analyzed further in an EIR.

Response a.ii:

A significant impact may occur if a project represents an increased risk to public safety or destruction of property by exposing people, property or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with locations in the Southern California region. Southern California is active seismic region (UBC Seismic Zone IV). Although the Project Site is not within an Alquist-Priolo Zone, the Site is susceptible to ground shaking during a seismic event. The main seismic hazard affecting the Site is moderate to strong ground shaking. The Project would conform to all applicable provisions of the City Building Code and the UBC with respect to new construction. Adherence to current building codes and engineering practices would ensure that the Project would not expose people, property or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with locations in the Southern California region. Nonetheless, as the Site is located in a seismically active region, this potential impact from ground shaking will be analyzed further in an EIR.

Response a.iii:

Liquefaction is a form of earthquake-induced ground failure that occurs primarily in relatively shallow, loose, granular, water-saturated soils. Liquefaction can occur when these types of soils lose their inherent shear strength due to excess water pressure that builds up during repeated movement from seismic activity. Low groundwater table and the presence of loose to medium dense sand and silty sand are factors that could contribute to the potential for liquefaction. The Project Site is not identified by ZIMAS as being within a liquefaction zone.[14] The City of Los Angeles Seismic Safety Element does not identify the Project Site as being within a liquefiable area, but there are some areas nearby that are susceptible to liquefaction.[15] The Project would be required to comply with building regulations set forth by the State Geologist, which require site analysis prior to development. Furthermore, the Project would comply with the CGS *Special Publications 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California* (1997), which provides guidance for evaluation and mitigation of earthquake-related hazards including liquefaction.

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[13] *City of Los Angeles, ZIMAS Parcel Profile Reports, website: http://zimas.lacity.org, November 11, 2016.*
[14] *City of Los Angeles, ZIMAS Parcel Profile Report, website: http://zimas.lacity.org, November 11, 2016.*
[15] *City of Los Angeles, Safety Element of the General Plan, Areas Susceptible to Liquefaction, Exhibit B.*

Nonetheless, because the Project Site is near susceptible areas, potential impacts associated with liquefaction will be analyzed further in an EIR.

Response a.iv:

A significant adverse effect may occur if a project is located in a hillside area with soil conditions that would suggest high potential for sliding. Landslides can occur on slopes under normal gravitational forces and during earthquakes when strong ground motion can cause failure. Landslides tend to occur in loosely consolidated, wet soil, and/or rock on unstable sloping terrain. The Project Site is topographically level and is not classified as a landslide hazard zone in the CGS Seismic Hazards Map.[16] The Project Site is also not identified by ZIMAS as being within a landslide hazard zone.[17] Therefore, a less than significant impact would occur and further evaluation of this issue in an EIR is not required.

Response b:

A significant impact may occur if a project exposes large areas to the erosional effects of wind or water for a protracted period of time. The Project Site is located in an urbanized portion of Los Angeles and is currently developed with an existing building. Any topsoil that may exist on the Site was previously blended with other on-site soils during previous site preparation/grading activities. As such, development of the Project would not result in substantial loss of topsoil. Construction activities such as grading and excavation could create a potential for soil erosion. The potential for soil erosion on the Project Site is low due to the generally level topography of the Project Site and the presence of off-site drainage facilities. Project construction would require the removal of existing pavement and grading earth and excavation. Conformance with City Building Code Sections 91.7000 through 91.7016, which include construction requirements for grading, excavation, and use of fill, would reduce the potential for wind or waterborne erosion. In addition, the Los Angeles Building Code requires an erosion control plan to be reviewed by the Department of Building and Safety prior to construction if grading exceeds 200 cubic yards and occurs during the rainy season (between November 1 and April 15). Therefore, Project impacts related to soil erosion during construction, with the inclusion of the proposed design features, are anticipated to be minimal. The potential for soil erosion during project operation would be relatively low due to the urbanized nature of the Project site and area and the generally level topography of the Site. In addition, the Project Site will be improved with new buildings, hardscape and landscape. Therefore, a less than significant impact would occur and further evaluation of this issue in an EIR is not required.

Response c:

A significant impact may occur if a project is built in an unstable area without proper site preparation or design features to provide adequate foundations for project buildings, thus posing a hazard to life and property. The Project Site is located in an urbanized portion of Los Angeles and is currently developed

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[16] *California Geologic Survey, Seismic Hazard Zones: http://gmw.consrv.ca.gov/shmp/download/pdf/ozn_holly.pdf.*

[17] *City of Los Angeles, ZIMAS Parcel Profile Report, website: http://zimas.lacity.org.*

with an existing building. Subsidence is a localized mass movement that involves the gradual downward settling or sinking of the ground, resulting from the extraction of mineral resources, subsurface oil, groundwater, or other subsurface liquids, such as natural gas. Since the Project may require dewatering for construction of the subterranean parking, the potential for subsidence may occur. Therefore, this issue and soil suitability will be analyzed further in an EIR.

Response d:

A significant impact may occur if a project is built on expansive soils without proper site preparation or design features to provide adequate foundations for project buildings, thus posing a hazard to life and property. Expansive soils are clay-based soils that tend to expand (increase in volume) as they absorb water and shrink as water is drawn away. If soils below the development consist of expansive clays within a zone where the water content can fluctuate, foundation movement and/or damage can occur. Although the Project must comply with building regulations set forth by the California Building Code, the potential for an impact still exists. Therefore, this issue will be analyzed further in an EIR.

Response e:

A significant impact may occur if a project is located in an area not served by an existing sewer system. The Project Site is located in a developed area of the City of Los Angeles, which is served by a wastewater collection, conveyance and treatment system operated by the City. No septic tanks or alternative disposal systems are necessary, nor are they proposed. Therefore, no impact would occur. Further evaluation of this issue in an EIR is not 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 upon the environment?	■	❑	❑	❑
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	■	❑	❑	❑

Responses a and b:

Construction and operation of the Project has the potential to generate greenhouse gas emissions because it will result in new construction and uses, which may directly or indirectly have a significant impact on the environment. In addition, the Project will need to be fully evaluated for consistency with all applicable plans, policies, and regulations for the purpose of reducing the emissions of greenhouse gases. Therefore,

the Project's generation of greenhouse gas emissions and consistency with plans will be analyzed in the EIR.

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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 it create a significant hazard to the public or the environment?	■	❑	❑	❑
e.	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard 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 the people residing or working in the 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?	❑	❑	❑	■

Response a:

A significant impact may occur if a project involves use or disposal of hazardous materials as part of its routine operations and would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors. The construction activities are anticipated to use typical, although potentially hazardous, construction materials, including vehicle fuels, paints, mastics, solvents, and other acidic and alkaline solutions that would require special handling, transport, and disposal. During operation, residential, retail, hotel, and office uses would store and use maintenance products, such as cleaning materials. Since the Project would require the transport, use, and disposal of hazardous materials, the potential for an impact exists. Therefore, this issue will be analyzed further in an EIR.

Response b:

A significant impact may occur if a project could potentially pose a hazard to nearby sensitive receptors by releasing hazardous materials into the environment through accident or upset conditions. Because the existing structure on the Project Site was constructed prior to enactment of the bans on asbestos and lead-based paint, it is likely to contain asbestos-containing-materials (ACMs) and lead-based-paint (LBP). Polychlorinated biphenyls (PCBs) and/or hazardous petroleum products could also potentially be present at the Site. Therefore, construction activities may have the potential to expose construction workers and sensitive receptors in the Project area to hazards associated with accidental exposure to ACMs, LBP, PCBs and/or petroleum products. Therefore, this issue will be analyzed further in an EIR.

Response c:

A significant adverse effect may occur if a Project Site is located within one-quarter mile of an existing or proposed school site and is projected to release toxic emissions which pose a health hazard beyond regulatory thresholds. The Project Site is located within 0.25 mile of the following schools:[18]

- Korpus School of Art and Gallery, 1300 Factory Place (900 feet south); and
- Southern California Institute of Architecture, 960 E. 3rd Street (900 feet northeast).

The Project would use, at most, minimal amounts of hazardous materials for routine cleaning and maintenance. However, since the Project would require the transport, use, and disposal of hazardous materials, the potential for an impact exists. Therefore, further analysis of this issue in an EIR is required.

Response d:

California Government Code Section 65962.5 requires various state agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis. A significant impact may occur if a Project Site is included on any of the above lists and poses an environmental hazard to

[18] *NavigateLA, Schools Layer: http://navigatela.lacity.org/navigatela/*

surrounding sensitive uses. The potential exists for the Project Site and/or any number of hazardous materials sites near the Project Site, including sites up-gradient, to be listed according to Government Code Section 65962.5 which could create a significant hazard to the public. Therefore, this issue will be analyzed further in an EIR.

Responses e and f:

A significant impact may occur if a project is located within two miles of a public airport, and subject to a safety hazard or within the vicinity of a private airstrip. The Project Site is not located in the vicinity of a public airport or private airstrip. Therefore, no impact would occur. Further evaluation of this issue in an EIR is not required.

Response g:

A significant impact may occur if a project were to interfere with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan or would generate traffic congestion that would interfere with the execution of such a plan. The construction and operation activities have the potential to impede public access or travel upon public rights-of-way as well as interfere with any adopted emergency response or evacuation plan. Therefore, this issue will be analyzed further in an EIR.

Response h:

A significant impact may occur if a project is located in proximity to wildland areas and poses a potential fire hazard, which could affect persons or structures in the area in the event of a fire. The Project Site is not located in a Very High Fire Hazard Severity Zone.[19] The Project Site is not located within a designated Fire Buffer Zone or Mountain Fire District in the 1996 City of Los Angeles Safety Element.[20] Therefore, no impact would occur. Further evaluation of this issue in an EIR is not required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. Hydrology And Water Quality. Would the project:				
a. Violate any water quality standards or waste discharge requirements?	❑	❑	■	❑

[19] *City of Los Angeles, ZIMAS Parcel Profile Report, website: http://zimas.lacity.org.*

[20] *City of Los Angeles, Safety Element of the General Plan, Selected Wildfire Hazard Areas, Exhibit D.*

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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 land 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 plain hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	❑	❑	❑	■
h.	Place within a 100-year flood plain hazard area structures which would impede or redirect flood flows?	❑	❑	❑	■
i.	Expose people or structures to a significant risk of loss, inquiry or death involving flooding, including flooding as a result of the failure of a levee or dam?	❑	❑	■	❑
j.	Inundation by seiche, tsunami, or mudflow?	❑	❑	❑	■

Response a:

A significant impact may occur if a project discharges water that does not meet the quality standards of agencies that regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts would also occur if a project does not comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB). These

regulations include compliance with the City's Low Impact Development Ordinance and/or Standard Urban Storm Water Mitigation Plan (SUSMP) requirements to reduce potential water quality impacts. The Project involves the development of a mixed-use building on land that is currently fully developed and completely paved. The Project would not alter the existing surface water runoff drainage pattern, would not reduce rainfall absorption at the Site, and would not result in a net increase of rates of stormwater discharge which may exceed water quality standards or waste discharge requirements. Therefore, this potential impact on water quality standards or waste discharge requirements would be less than significant and further evaluation in an EIR is not required.

Response b:

A significant impact may occur if a project includes deep excavations which have the potential to interfere with groundwater movement, or includes withdrawal of groundwater or paving of existing permeable surfaces that are important to groundwater recharge. The Project does not propose any permanent groundwater wells or pumping activities. All water supplied to the Site would be derived from the City's existing water supply and infrastructure. In addition, the Project would not increase the amount of impervious surface area located on the Project Site upon completion of project construction. Although construction of the Project would include excavation and could possibly require dewatering at the Site, the amount of groundwater infiltration likely to occur would be minimal given the small area and relatively shallow depth of the proposed excavation (approximately 50 feet below grade) in an area where groundwater has not been encountered in test borings drilled to 95 feet below ground surface.[21] If groundwater is encountered during excavation work, compliance with the requirements of the Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (Order No. R4-2013-0095, National Pollutant Discharge Elimination System No. CAG994004) or subsequent permit would be mandatory. This would include submission of a Notice of Intent for coverage under the permit to the Los Angeles Regional Water Quality Control Board at least 45 days prior to the start of dewatering and compliance with all applicable provisions in the permit, including water sampling, analysis, and reporting of dewatering-related discharges. Therefore, this potential impact would be less than significant and further evaluation in an EIR is not required.

Response c:

A significant impact may occur if a project would substantially alter drainage patterns resulting in a significant increase in erosion or siltation during construction or operation of a project. There are no natural watercourses on the Project Site. The Site is currently fully developed. As part of the Project, grading and construction activities may temporarily alter the existing drainage patterns of the Site. However, compliance with the requirements of the mandated construction Stormwater Pollution Prevention Plan (SWPPP) would reduce the occurrence of erosion and siltation during construction and operation to the

[21] *GeoDesign, Inc., Phase I Environmental Site Assessment, The Art District Center, 1129 E. 5th Street, Los Angeles CA 90013, June 26, 2014.*

maximum extent practicable. Therefore, this potential impact would be less than significant and further evaluation in an EIR is not required.

Response d:

A significant impact may occur if a project results in increased runoff volumes during construction or operation of the project would result in flooding conditions affecting the Project Site or nearby properties. Grading and construction activities on the Project Site may temporarily alter the existing drainage patterns of the Site and off-site flows, thereby having a potential impact. However, compliance with the requirements of the mandated construction Stormwater Pollution Prevention Plan (SWPPP) would reduce the amount of additional stormwater runoff from the Project Site during construction and operation to the maximum extent practicable. Therefore, this potential impact would be less than significant and further evaluation in an EIR is not required.

Response e:

A significant impact may occur if a project would increase the volume of stormwater runoff to a level which exceeds the capacity of the storm drain system serving the Project Site, or if the proposed project would introduce substantial new sources of polluted runoff. Construction of the project could contribute to the degradation of existing surface water quality conditions primarily due to: 1) potential erosion and sedimentation during the grading phase; 2) particulate matter from dirt and dust generated on the Site; and 3) construction activities and equipment. However, compliance with the requirements of the mandated construction and operation Stormwater Pollution Prevention Plans (SWPPP), as well as with the requirements of the City's Low Impact Development Ordinance and/or SUSMP, would reduce the amount of additional stormwater runoff from the Project Site and the introduction of pollutants to stormwater runoff during construction and operation to the maximum extent practicable. Development of the Proposed Project would not increase overall stormwater runoff volume as the Project Site is currently completely covered with impervious surfaces. Therefore, this potential impact would be less than significant and further evaluation in an EIR is not required.

Response f:

As previously discussed, the Project could involve the use of contaminants that could potentially degrade water quality if not properly handled and stored. However, compliance with the requirements of the mandated construction and operation Stormwater Pollution Prevention Plans (SWPPP), as well as with the requirements of the City's Low Impact Development Ordinance and/or SUSMP, would reduce the introduction of contaminants to stormwater runoff during Project construction and operation to the maximum extent practicable. Therefore, this potential impact would be less than significant and further evaluation in an EIR is not required.

Response g-h:

The Project Site is not located within an area identified by Federal Emergency Management Agency (FEMA) as potentially subject to 100-year floods.[22] The Site is not located within a City-designated 100-year or 500-year flood plain.[23] As the Site is located in an area of minimal flooding, the Project would not introduce people or structures to an area of high flood risk. Therefore, the Project would not contain any significant risks of flooding and would not have the potential to impede or redirect floodwater flows. No impact would occur and no further analysis of this issue is required.

Response i:

A significant impact may occur if a project were located in an area where flooding, including flooding associated with dam or levee failure, would expose people or structures to a significant risk of loss, injury, or death. Based on a review of the County of Los Angeles Flood and Inundation Hazards Map, it is concluded that the Project site does not lie within a mapped inundation area.[24] The Project Site is located approximately 1,500 feet west of the Los Angeles River, which is contained in a flood control channel. The Project Site is within the City-designated potential inundation area of Los Angeles River flood control channel, as is much of Downtown and Central Los Angeles.[25] The Project Site and the surrounding areas could be inundated with floodwaters if the levees along the Los Angeles River channel were to fail, which is a remote possibility. The Los Angeles River flood control channel is maintained by the U.S. Army Corps of Engineers (USACE), which is responsible for periodically analyzing its facilities for earthquake safety and potential failures. Current design and construction practices and ongoing programs of review, modification, or total reconstruction of existing channel and drainage infrastructure are intended to ensure that all such facilities are capable of withstanding the maximum credible earthquake for the site. Flooding from other sources is not expected; thus the minimal risk of flooding from potential levee failure would not be exacerbated by the development of the Project. Thus, the failure of the Los Angeles River flood control channel is considered remote and does not present a significant risk of loss, injury or death to people or structures. Moreover, the area surrounding the Project Site is highly urbanized and there are no other levees or dams within the immediate vicinity of the Project Site. Thus, the Project would not 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 and no impact would occur.

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[22] *NavigateLA, FEMA Flood Hazard layer: http://navigatela.lacity.org/navigatela/, November 20, 2016.*

[23] *City of Los Angeles, Safety Element of the General Plan, 100-Year and 500-Year Flood Plains, Exhibit F.*

[24] *Los Angeles County Department of Public Works, FEMA Flood Zone Determination Website http://dpw.lacounty.gov/wmd/floodzone/, accessed November 2016.*

[25] *City of Los Angeles, Safety Element, Exhibit G, Inundation & Tsunami Hazard Areas in the City of Los Angeles: http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf, accessed November 20, 2016.*

Response j:

A significant impact may occur if a project is sufficiently close to the ocean or other water body to be potentially at risk of the effects of seismically-induced tidal phenomena (i.e., seiche and tsunami) or if the site is located adjacent to a hillside area with soil characteristics that would indicate potential susceptibility to mudslides or mudflows. The Project Site is not located in a Tsunami Hazard Area, and is located at least 14 miles from the Pacific Ocean and is not near any major water bodies potentially at risk of the effects of a seismically-induced tidal phenomena. Therefore, there is no impact associated with seiches or tsunamis at the Site. In addition, the Site is in an urbanized portion of the City of Los Angeles, and is relatively flat, thereby limiting the potential for inundation by mudflow. No further analysis of this issue 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, 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?	❑	❑	❑	■

Response a:

A significant impact may occur if a project is sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community (a typical example would be a project which involved a continuous right-of-way such as a roadway which would divide a community and impede access between parts of the community). The Project Site is approximately one acre in size and is currently developed with commercial uses. Redevelopment of the Site with the Proposed Project would not physically divide a community. Therefore, no impact would occur and no further analysis of this issue is required.

Response b:

A significant impact may occur if a project is inconsistent with the General Plan or zoning designations currently applicable to the Project Site and would cause adverse environmental effects, which the General Plan and zoning ordinance are designed to avoid or mitigate. The Project would require several discretionary actions by the City which could conflict with land use plans, policies or regulations, leading to a potentially significant impact. The EIR will provide additional analysis to assess the potential impact

from the project's consistency with applicable General Plan policies, zoning code restrictions, Southern California Association of Governments (SCAG) policies, any other applicable City (such as the Central City North Community Plan) or regional plans and policies (such as the SCAQMD and Metro CMP). Therefore, this issue will be further analyzed in an EIR.

Response c:

A significant impact may occur if a project is inconsistent with policies in any draft or adopted conservation plan. The Project Site is currently developed and is located in an urbanized area. As discussed under Checklist Question IV(f), there is no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan that applies to the Site. Implementation of the Project would not conflict with any habitat conservation plans. Therefore, no impact would occur and no mitigation measures would be required. Further evaluation of this issue in an EIR is not required.

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XI.	**Mineral Resources**. Would the project:				
a.	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	❑	❑	❑	■
b.	Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	❑	❑	❑	■

Response a:

A significant impact may occur if a project is located in an area used or available for extraction of a regionally-important mineral resource, and if the project converted an existing or potential future regionally-important mineral extraction use to another use, or if the project affected access to a site used or potentially available for regionally-important mineral resource extraction. The State Mining and Reclamation Act of 1975 (SMARA) requires that the State Mining and Geology Board (SMGB) map areas throughout the State of California that contain regionally significant mineral resources. Aggregate mineral resources within the state are classified by the SMGB through application of the Mineral Resource Zone (MRZ) system. The MRZ system is used to map all mineral commodities within identified jurisdictional boundaries. The MRZ system classifies lands that contain mineral deposits and identifies the presence or absence of substantial sand and gravel deposits and crushed rock source areas (i.e., commodities used as, or in the production of, construction materials). The Project Site is located within an area classified as MRZ-2, defined as areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood exists for their presence.

The Project Site is located within the Union Station Oil Field. Although no oil wells exist or are known to have previously existed on or immediately adjacent to the Project Site, plugged wells do exist within a 1,500-foot radius of the site. The Project Site is not located within an Oil Drilling/Surface Mining Supplemental Use District.[26,27]

Should any future mineral resource be discovered on or near the Project Site, development of the Project would not alter the potential future utility of any minerals located beneath the site. Therefore, no impact associated with the loss of availability of a known mineral resource would occur as a result of Project development. Therefore, further evaluation in an EIR is not required.

Response b:

A significant impact may occur if a project is located in an area used or available for extraction of a locally-important mineral resource extraction, and if the project converted an existing or potential future locally-important mineral extraction use to another use, or if the project affected access to a site used or potentially available for locally-important mineral resource extraction. The Project Site is located within a Mineral Resource Zone 2 (MRZ-2) Area.[28] The Project Site is not designated as a locally important mineral resource recovery site delineated on the Los Angeles General Plan, a specific plan, or other land use plan. Should any future mineral resource be discovered on or near the Project Site, development of the Project would not preclude the mineral's extraction, nor would it alter the potential utility of any minerals located beneath the site. Therefore, no impact associated with the loss of availability of a locally important mineral resource recovery site would occur.

Additionally, according to the Conservation Element of the City of Los Angeles General Plan, sites that contain potentially significant sand and gravel deposits which are to be conserved follow the Los Angeles River flood plain, coastal plain, and other water bodies and courses and lie along the flood plain from the San Fernando Valley through downtown Los Angeles. Much of the area identified has been developed with structures and is inaccessible for mining extraction.[29] Therefore, no impact would occur and further evaluation of this issue in an EIR is not required.

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[26] *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps, September 1996.*

[27] *State of California Department of Conservation, Division of Oil, Gas & Geothermal Resources, Online Mapping System, District 1, website: http://www.conservation.ca.gov/dog/Pages/WellFinder.aspx, accessed December 2016.*

[28] *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Areas Containing Significant Mineral Deposits in the City of Los Angeles, September 1996.*

[29] *City of Los Angeles, Conservation Element of the General Plan, September 16, 2001; pg II-57.*

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XII.	**Noise.** Would the project result in:				
a.	Exposure of persons to or generation of noise in levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	■	❑	❑	❑
b.	Exposure of people 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?	■	❑	❑	❑
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?	❑	❑	❑	■

Response a:

A significant impact may occur if the Project would generate excess noise that would cause the ambient noise environment at the Project Site to exceed noise level standards set forth in the City of Los Angeles General Plan Noise Element (Noise Element) and the City of Los Angeles Noise Ordinance (Noise Ordinance). Construction would require the use of construction equipment during grading, excavation, hauling, establishing building foundations, and other construction activities. The concurrent use of construction equipment and machinery has the potential to increase noise levels above the applicable standards of the City's Noise Ordinance. Existing on-site noise sources include the existing commercial/industrial uses. The Project would increase the activities that would occur on the Site and noise levels from on-site sources also have the potential to increase during Project operation. In addition, the traffic attributable to the Project has the potential to cause noise levels to exceed City Noise Ordinance standards. Therefore, the potential impact from these noise increases will be analyzed further in an EIR.

Response b:

A significant impact would occur if the Project were to generate or expose people to excessive groundborne vibration or groundborne noise levels. Construction of the Project would require the use of heavy construction equipment during grading, excavation, hauling, establishing building foundations, and other construction activities. The use of earthmoving equipment and machinery has the potential to cause groundborne vibration and noise which could have a potentially significant impact. During operation, ground-borne vibration may also occur from increased road traffic or other on-site activities. Therefore, this issue will be analyzed further in an EIR.

Response c:

A significant impact may occur if the operation of the Project would introduce substantial new sources of noise or would substantially add to existing sources of noise within the vicinity of the Site. Traffic and human activity associated with the Project, as described above, have the potential to increase ambient noise levels above existing levels which could have a potentially significant impact. Therefore, this issue will be analyzed further in an EIR.

Response d:

A significant impact may occur if a project were to introduce substantial new sources of noise or substantially add to existing sources of noise within or in the vicinity of the Project Site during construction of the Project or on a periodic basis during the operation of the Project. As discussed above, construction activity has the potential to temporarily or periodically increase ambient noise levels above existing levels. In addition, the increase in on-site uses may also result in periodic increases in noise levels which could have a potentially significant impact. Therefore, this issue will be analyzed further in an EIR.

Response e:

A significant impact may occur if a project is located within an airport land use plan and would introduce substantial new sources of noise or substantially add to existing sources of noise within or in the vicinity of the Project Site during construction of the proposed project. As discussed under Checklist Question VIII(e), the Project Site is not located within an airport land use plan area or within two miles of a public airport or public use airport. The Project would therefore not expose people residing or working in the project area to excessive noise levels from an airport use. Therefore, no impact would occur and further evaluation of this issue is not required.

Response f:

This question would apply to a project only if it were in the vicinity of a private airstrip and would subject area residents and workers to a safety hazard. As discussed under Checklist Question VIII(f), there are no private airstrips in the vicinity of the Site. Therefore, no impact would occur and further evaluation of this issue is not required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	❑	❑	❑	■

Response a:

A significant impact may occur if a project would locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing population growth that would otherwise not have occurred as rapidly or in as great a magnitude. The Project would result in the generation of jobs (both for construction and operation) and would also result in an increased residential population which could induce potentially significant population growth. Therefore, this issue will be further analyzed in an EIR.

Response b:

A significant impact may occur if a project would result in displacement of a substantial number of existing housing units, necessitating construction of replacement housing elsewhere. The Project would not displace any housing since there is no existing housing on the Site. Further, the Project would develop residential units. Therefore, no impact would occur and further evaluation in an EIR is not required.

Response c:

A significant impact may occur if a project would result in displacement of existing residents, necessitating the construction of replacement housing elsewhere. The Project would not displace people necessitating the construction of replacement housing elsewhere. There is no existing housing on the Site. Therefore, no impact would occur and further evaluation in an EIR is not required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. Public Services. Would the project result in substantial adverse physical impacts associated with the provision of				

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
	new or physically altered governmental facilities, 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?	■	❑	❑	❑

Response a:

A significant impact may occur if the City of Los Angeles Fire Department (LAFD) could not adequately serve the Project based upon response time, access, or fire hydrant/water availability, necessitating the construction of a new or physically altered facility. The Project is served by:

- Fire Station No. 3, located at 108 N. Fremont Avenue, approximately 1.9 miles from the Site.
- Fire Station No. 4, located at 450 E. Temple Street, approximately 0.9 mile from the Site.
- Fire Station No. 9, located at 430 E. 7th Street, approximately 1.3 miles from the Site.

The Project would increase the intensity of development at the Project Site, which may require the provision of new facilities to maintain acceptable service ratios. This potential impact of the Project on fire protection services will be analyzed in the EIR.

Response b:

A significant impact may occur if the City of Los Angeles Police Department (LAPD) could not adequately serve the Project, necessitating a new or physically altered station. If existing service capacities are exceeded, new facilities, equipment and/or personnel may be required to maintain acceptable response times and service levels. The Project is within the LAPD's Central Community Police Station service area,

located at 251 E. 6th Street.[30] The Project would increase the intensity of development at the Project Site, resulting in a potentially significant impact on police protection services. This will be analyzed in the EIR.

Response c:

A significant impact may occur if a project includes substantial employment or population growth, which could generate a demand for school facilities that would exceed the capacity of the Los Angeles Unified School District (LAUSD). The Project would directly impact local schools by providing new housing to families with school-age children, and indirectly impact schools by providing jobs that may cause employees with families to relocate to an area, thus necessitating new school facilities. The potential impact of the Project on school facilities will be analyzed in the EIR.

Response d:

A significant impact would occur if the available City of Los Angeles Department of Recreation and Parks (LADRP) recreation and park services could not accommodate a project, necessitating new or physically altered facilities and the construction of which could cause significant environmental impacts. The Project includes the development of live/work uses that would increase the permanent residential population of the area. Residential developments typically have the greatest potential to result in impacts to parks since they generate a permanent increase in residential population. Therefore, there could be a potentially significant impact from new parks or recreation facilities. The EIR will evaluate the Project's impacts on park facilities.

Response e:

A significant impact may occur if a project includes substantial employment or population growth that could exceed the capacity of public facilities (such as libraries), necessitating a new or physically altered library, the construction of which would have significant physical impacts on the environment. The Project is served by the Los Angeles Public Library (LAPL). The Little Tokyo Branch Library located at 203 S. Los Angeles Street is the closest library to the Site. Developments such as the Proposed Project typically have the greatest potential to result in impacts to libraries since they generate a permanent increase in population. Therefore, the EIR will evaluate the Project's potential impacts upon library facilities.

[30] *LAPD: http://www.lapdonline.org/central_community_police_station*

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	■	❑	❑	❑
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?	■	❑	❑	❑

Response a:

A significant impact may occur if the Project would include substantial employment or population growth that could generate an increased demand for public park facilities which exceeds the capacities of existing parks and/or cause premature deterioration of the park facilities. The Project involves the construction of new live/work uses that could increase the demand for neighborhood and regional parks and recreational facilities in the area (see XIV, Parks). While on-site open space and recreational amenities would be included, the Project has the potential to increase demands upon several public park facilities located within the project area. The EIR will evaluate the potential of the Project to cause an increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur.

Response b:

As discussed above, the Project has the potential to increase demands upon recreational facilities that may in turn require the construction of new facilities or the expansion of existing facilities. The construction of these facilities may have an adverse physical effect on the environment. Therefore, the potential of such facilities to have an adverse effect on the environment will be analyzed in the EIR.

	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 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?	■	❑	❑	❑

Response a:

A significant impact would occur if the Project generated traffic at each study intersection would exceed City of Los Angeles Department of Transportation (LADOT) standards. According to LADOT policy, a significant project impact would occur when the Critical Movement Analysis (CMA) value increases by 0.010 or more when the final Level of Service (LOS) at a given study intersection is E or F; by 0.020 or more when the final LOS is D; or by 0.040 or more when the final LOS is C. It is unknown at this time whether the Project may result in potentially significant traffic impacts during operation and construction. The potential impacts of the Project will be evaluated in a traffic study in accordance with the assumptions, methodology, and procedures approved by LADOT and will be included in the EIR.

Response b:

A significant impact may occur if adopted California Department of Transportation (Caltrans) and County of Los Angeles Metropolitan Transit Authority (MTA) thresholds are exceeded. The Congestion Management Program (CMP) was adopted to regulate and monitor regional traffic growth and transportation improvement programs. The CMP designates a transportation network which includes all state highways and some arterials within the County of Los Angeles. If the level of service standard deteriorates on the CMP network, then local jurisdictions must prepare a deficiency plan that is in conformance with the Los Angeles County CMP. The intent of the CMP is to provide information to decision-makers to assist in the allocation of transportation funds through the State Transportation Improvement Program (STIP) process. A CMP traffic impact analysis is required if a project would add 150 or more trips to the freeway, in either direction during either the AM or PM weekday peak hour. An analysis is also required at all CMP monitoring intersections where a project would add 50 or more peak hour trips. The local CMP requires that all CMP monitoring intersections be analyzed where a project would likely add 50 or more trips during the peak hours. It is unknown at this time whether the Project may result in a potentially significant traffic impact at any CMP monitoring locations. However, there could be an impact if levels of service standards are exceeded. Therefore, this issue will be analyzed further in an EIR.

Response c:

A significant impact would occur if a proposed project included an aviation-related use and would result in safety risks associated with such use. The Project does not include any aviation-related uses. Furthermore, as discussed under Checklist Question VIII(e), the Project Site is not located within an airport land use plan area or within two miles of a public airport or private use airport. Safety risks associated with a change in air traffic patterns would not occur. Therefore, no impact would occur and no mitigation measures would be required. Further evaluation of this issue in an EIR is not required.

Response d:

A significant impact may occur if a project includes new roadway design or introduces a new land use or project features into an area with specific transportation requirements, characteristics, or project access or other features designed in such a way as to create hazardous conditions. It is unknown at this time whether the Project may increase hazards due to a design feature. In addition, there could be a potentially significant impact if the driveway width and queuing length result in inadequate space to accommodate the vehicles for the Project. Therefore, this issue will be analyzed further in an EIR.

Response e:

A significant impact may occur if a project design does not provide emergency access meeting the requirements of the LAFD or in any other way threatens the ability of emergency vehicles to access and serve the Project Site or adjacent uses. The increased traffic during construction and operation could obstruct emergency vehicle access to the Project Site and adjacent uses in the Project vicinity. Therefore,

the EIR will provide additional analysis to assess the potential of the Project to result in impacts on emergency access.

Response f:

A significant impact may occur if a project would conflict with adopted policies or involve modification to existing alternative transportation facilities located on- or off-site. The potential of the Project to decrease the performance of these facilities or conflict with adopted policies, plans, and programs supporting alternative transportation will be analyzed in the EIR.

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. 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 stormwater 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?	■	❑	❑	❑
g.	Comply with federal, state, and local statutes and regulations related to solid waste?	❑	❑	■	❑

Response a:

A significant impact would occur if a project exceeds wastewater treatment requirements of the applicable Regional Water Quality Control Board. The City of Los Angeles Department of Public Works provides

wastewater services for the Project Site. Wastewater discharges are conveyed to the Hyperion Treatment Plant (HTP), which is a public facility and is therefore subject to the state's wastewater treatment requirements which, in the project area, are enforced by the Los Angeles Regional Water Quality Control Board (LARWQCB). The HTP has a current capacity of 450 million gallons per day (mgd). The Project's introduction of new live/work, hotel, retail, restaurant, and art gallery uses could result in the potential to exceed wastewater treatment requirements of the LARWQCB. This potentially significant impact will be analyzed in the EIR.

Response b:

A significant impact may occur if a project would increase water consumption or wastewater generation to such a degree that new facilities would be needed, the construction of which would cause significant environmental effects. The Project is expected to increase water usage and wastewater generated as compared to the existing uses on the Project Site. The potentially significant impact with respect to the capacity of the water and wastewater treatment plants and the existing water and sewer lines that serve the Site will be analyzed in the EIR.

Response c:

A significant impact may occur if the volume of stormwater runoff were to increase to a level exceeding the capacity of the storm drain system serving the Project Site, to the extent that existing facilities would need to be expanded and the construction of which would cause significant environmental effects. The Project Site is currently fully developed and covered with impervious surfaces. Development of the Proposed Project would not increase the amount of impervious surface area at the Site and, consequently, would not increase the volume of stormwater runoff from the Site. Therefore, this impact would be less than significant and no further evaluation of this issue is required in an EIR.

Response d:

A significant impact may occur if a project were to increase water consumption to such a degree that new water sources would need to be identified, or that existing resources would be consumed at a pace greater than planned for by purveyors, distributors, and service providers. The Project is estimated to increase water consumption as compared to the existing uses on the Site, resulting in a potentially significant impact if new or expanded entitlements are needed. Given the Project's size, a Water Supply Assessment by the Los Angeles Department of Water and Power (LADWP) may be necessary in order to evaluate the water supply's availability to serve the Project. Any potential impacts with respect to water supply will be analyzed within the EIR.

Response e:

A significant impact may occur if a project would increase wastewater generation to such a degree that the capacity of facilities currently serving the Project Site would be exceeded. As discussed under Checklist Question XVII(b), the Project is estimated to generate an increase in wastewater as compared to the existing

development on the Site. Therefore, this potential impact related to wastewater treatment plant capacity and availability will be analyzed in the EIR.

Response f:

A significant impact may occur if a project were to increase solid waste generation to a degree such that the existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. Since the Project will result in an increase in residents and users, there could be a potentially significant impact if those solid waste disposal needs are not accommodated by a landfill. Therefore, the potential impacts associated with the ability of the local landfills to serve the Project will be analyzed in the EIR.

Response g:

Solid waste management is guided by the California Integrated Waste Management Act of 1989, which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. The Act requires that localities conduct a Solid Waste Generation Study (SWGS) and develop a Source Reduction Recycling Element (SRRE). The City of Los Angeles prepared a Solid Waste Management Policy Plan that was adopted by the City Council in 1994. Solid waste generated on-site by the Project would be disposed of in accordance with all applicable federal, state, and local regulations and policies related to solid waste, including (but not limited to) AB 939, CiSWMPP, SRRE, Ordinance No. 171687 and the Framework Element of the General Plan. The Project would provide clearly marked, durable, source sorted recycling bins throughout the Project Site to facilitate recycling in accordance with Ordinance No. 171687. The Project would comply with federal, state, and local statutes and regulations related to solid waste. Therefore, a less than significant impact would occur and no mitigation measures would be required. No further analysis is required in an EIR.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. Mandatory Findings Of Significance.				
a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of 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 which 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?	■	❑	❑	❑

Response a:

Based on the analysis contained in this Initial Study, the project has the potential to result in significant impacts with regard to the issues addressed herein. Therefore, the Project has the potential to degrade the quality of the environment. An EIR will be prepared to analyze and document these potentially significant impacts. All feasible mitigation measures will be identified to reduce the identified significant impacts.

Response b:

The potential for cumulative impacts occurs when the independent impacts of the project are combined with the impacts of related projects in proximity to the Project Site such that impacts occur that are greater than the impacts of the project alone. Located within the vicinity of the Project Site are other past, current, and/or reasonably foreseeable projects whose development, 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 addressed in an EIR. Therefore, the potential for cumulative impacts related to aesthetics, air quality, geology and soils, greenhouse gas emissions, hazards/hazardous materials, land use and planning, noise, population and housing, public services, transportation and traffic, and utilities and service systems resulting from the project in conjunction with the applicable related projects will be analyzed and documented in an EIR. The potential for significant cumulative impacts from the other environmental

issues that are not to be evaluated and documented in the EIR can be assessed at this time. Cumulative impacts are concluded to be less than significant for those issues for which it has been determined that the project's incremental contribution would be less than significant. Therefore, only those aspects of the Project to be analyzed and documented in an EIR are concluded to have the potential for significant cumulative impacts.

Response c:

As discussed above, construction and operation of the Project could result in environmental effects that could have substantial adverse effects on human beings, either directly or indirectly. As a result, these potential effects will be analyzed further in an EIR.

DISCUSSION OF THE ENVIRONMENTAL EVALUATION (Attach additional sheets if necessary)

As noted above, the lead agency has determined that the proposed project may result in a significant effect on the environment, and an environmental impact report is required.

PREPARED BY	TITLE	TELEPHONE	DATE
William Lamborn	City Planner	213-978-1470	March 2017