

# City of Los Angeles

Department of City Planning • Major Projects & Environmental Analysis Section  
City Hall • 200 N. Spring Street, Room 750 • Los Angeles, CA 90012



## INITIAL STUDY Northeast Los Angeles Community Plan Area

### Bow Tie Yard Lofts Project

**Case Number: ENV-2016-2862-EIR**

**Project Location:** 2750-2800 W. Casitas Avenue, Los Angeles, California 90039

**Council District:** 1, Gilbert A. Cedillo

**Project Description:** The Applicant proposes the development of a mixed-use project in the Northeast Los Angeles Community Plan area that would consist of five buildings with a total of 419 multi-family residential units (approximately 423,872 square feet) and approximately 64,000 square feet of commercial space. The 5.7-acre Project Site is located at the terminus of Casitas Avenue in Glassell Park in Northeast Los Angeles. The Los Angeles River is adjacent to the Project Site's southern boundary line, and the Glendale Freeway (SR-2) is located to the north and west of the Project Site. The existing zoning designation of the Project Site is [Q]PF-1-CDO-RIO. Existing on-site uses, including a light manufacturing/warehouse/film production building (approximately 117,000 square feet) and its associated surface parking, would be demolished as part of the Proposed Project.

The proposed residential units would include a combination of 119 studios, 220 one-bedroom, and 80 two-bedroom units in four buildings ranging from five to six stories (60 to 81 feet above grade). Eleven percent of the base-density residential units (approximately 35 units) would be reserved as Very Low Income Units. Commercial uses on-site may include a mix of restaurant uses, office space, and an approximate 42,000 square foot urban farm. A seven-story (85 feet above grade) parking garage on the northwest end of the Project Site would provide 720 on-site parking spaces on levels one through six. The seventh level of the parking structure would include an urban farm/greenhouse. The Proposed Project would provide required on-site vehicle and bicycle parking spaces pursuant to the LAMC. Open space areas and recreational amenities would include approximately 58,176 square feet.

The Applicant is requesting the following discretionary approvals: (1) Pursuant to LAMC Section 11.5.6, a General Plan Amendment to the Northeast Los Angeles Community Plan to change the land use designation from Heavy Manufacturing to Limited Industrial; (2) Pursuant to LAMC Section 12.32.Q, a Vesting Zone Change from [Q]PF-1-CDO-RIO to CM-1-CDO-RIO; (3) Pursuant to LAMC Section 16.05.C.1(b), Site Plan Review for the development of 419 residential units and 64,000 square feet of commercial uses; (4) Pursuant to LAMC Section 12.24-U.26 and with the Project providing 11 percent of the total units (excluding density bonus units) as Very Low Income Units, a Conditional Use Permit to allow a density bonus (a total of 108 density bonus units) greater than the maximum permitted by LAMC Section 12.22-A.25; (5) Pursuant to LAMC Section 12.22.A-25 and with the Proposed Project providing 11 percent (excluding density bonus units) as Very Low Income Units, Density Bonus Compliance Review for an On Menu Density Bonus Incentive for a 35 percent increase in Floor Area Ratio (FAR) – an increase from 1.5:1 to 2.02:1 FAR – and a Waiver or Modification of Development Standard Not on the Menu to use lot area as buildable area; (6) Pursuant to LAMC Section 13.08, Design Overlay Plan Approval; and (7) Pursuant to LAMC Section 17.15, a Vesting Tentative Tract Map for the subdivision of one lot into one ground lot and 17 airspace lots. Other approvals (as needed), ministerial or otherwise, may be necessary, including demolition permits, haul route approval, grading and associated building permits.

**APPLICANT:**  
2800 Casitas, LLC

**PREPARED BY:**  
Parker Environmental Consultants

**ON BEHALF OF:**  
The City of Los Angeles  
Department of City Planning  
Major Projects & Environmental  
Analysis Section

**February 2017**

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# CITY OF LOS ANGELES

OFFICE OF THE CITY CLERK  
ROOM 360, CITY HALL  
LOS ANGELES, CALIFORNIA 90012

## CALIFORNIA ENVIRONMENTAL QUALITY ACT INITIAL STUDY AND CHECKLIST

<b>LEAD CITY AGENCY</b> City of Los Angeles Department of City Planning	<b>ADDRESS</b> 200 N. Spring St., Los Angeles, CA 90012	<b>DATE</b> February 16, 2017
<b>CONTACT PERSON</b> Jon Chang	<b>TELEPHONE NUMBER</b> (213) 978-1914	
<b>RESPONSIBLE AGENCIES</b> South Coast Air Quality Management District, Regional Water Quality Control Board		
<b>PROJECT LOCATION:</b> The Proposed Project is located at 2750-2800 West Casitas Avenue within the Northeast Los Angeles Community Plan Area in the City of Los Angeles. The Project Site encompasses approximately 248,190 square feet of lot area (5.7 acres). The Project Site includes one parcel with Assessor Parcel No. (APN) 5442-002-012.		
<b>PROJECT TITLE/NO.</b> Bow Tie Yard Lofts Project	<b>CASE NO.</b> ENV-2016-2862-EIR; CPC-2016-3054-GPA-VZC-DB-CDO-SPR; VTT-74366	
<b>PREVIOUS ACTIONS CASE NO.</b> N/A	<input type="checkbox"/> DOES have significant changes from previous actions. <input type="checkbox"/> DOES NOT have significant changes from previous actions.	

### PROJECT DESCRIPTION

The Applicant proposes the development of a mixed-use project in the Northeast Los Angeles Community Plan area that would consist of five buildings with a total of 419 multi-family residential units (approximately 423,872 square feet) and approximately 64,000 square feet of commercial space. The 5.7-acre Project Site is located at the terminus of Casitas Avenue in Glassell Park in Northeast Los Angeles. The Los Angeles River is adjacent to the Project Site's southern boundary line, and the Glendale Freeway (SR-2) is located to the north and west of the Project Site. The existing zoning designation of the Project Site is [Q]PF-1-CDO-RIO. Existing on-site uses, including a light manufacturing/warehouse/film production building (approximately 117,000 square feet) and its associated surface parking, would be demolished as part of the Proposed Project.

The proposed residential units would include a combination of 119 studios, 220 one-bedroom, and 80 two-bedroom units in four buildings ranging from five to six stories (60 to 81 feet above grade). Eleven percent of the base-density residential units (approximately 35 units) would be reserved as Very Low Income Units. Commercial uses on-site may include a mix of restaurant uses, office space, and an approximate 42,000 square foot urban farm. A seven-story (85 feet above grade) parking garage on the northwest end of the Project Site would provide 720 on-site parking spaces on levels one through six. The seventh level of the parking structure would include an urban farm/greenhouse. The Proposed Project would provide required on-site vehicle and bicycle parking spaces pursuant to the LAMC. Open space areas and recreational amenities would include approximately 58,176 square feet.

The Applicant is requesting the following discretionary approvals: (1) Pursuant to LAMC Section 11.5.6, a General Plan Amendment to the Northeast Los Angeles Community Plan to change the land use designation from Heavy Manufacturing to Limited Industrial; (2) Pursuant to LAMC Section 12.32.Q, a Vesting Zone and Height District Change from [Q]PF-1-CDO-RIO to CM-1-CDO-RIO; (3) Pursuant to LAMC Section 16.05.C.1(b), Site Plan Review for the development of 419 residential units and 64,000 square feet of commercial uses; (4) Pursuant to LAMC Section 12.24-U.26 and with the Project providing 11 percent of the total units (excluding density bonus units) as Very Low Income Units, a Conditional Use Permit to allow a density bonus (a total of 108 density bonus units) greater than the maximum permitted by LAMC Section 12.22-A.25; (5) Pursuant to LAMC Section 12.22.A-25 and with the Proposed Project providing 11 percent (excluding density bonus units) as Very Low Income Units, Density Bonus Compliance Review for an On Menu Density Bonus Incentive for a 35 percent increase in Floor Area Ratio

(FAR) – an increase from 1.5:1 to 2.02:1 FAR – and a Waiver or Modification of Development Standard Not on the Menu to use lot area as buildable area; (6) Pursuant to LAMC Section 13.08, Design Overlay Plan Approval and (7) Pursuant to LAMC Section 17.15, a Vesting Tentative Tract Map for the subdivision of one lot into one ground lot and 17 airspace lots. Other approvals (as needed), ministerial or otherwise, may be necessary, including demolition permits, haul route approval, grading and associated building permits.

#### ENVIRONMENTAL SETTING:

The Project Site includes approximately 248,190 square feet of lot area (5.7 acres), and is currently developed with an approximately 117,000 square foot light manufacturing/warehouse/film production building and paved surface parking. The Project Site is zoned [Q]PF-1-CDO-RIO (Qualified Classification, Public Facilities, Height District No. 1, Community District Overlay District, River Improvement Overlay District). The Project Site is located at the terminus of Casitas Ave. in Northeast Los Angeles. A self-storage facility abuts the Project Site to the north. The Glendale Freeway (SR-2) is located to the north and west of the Project Site and the self-storage facility property. A residential community is located beyond the SR-2 Freeway. An on-ramp onto the SR-2 Freeway is located immediately to the west of the Project Site. A railway is located to the northeast and runs in a north-south direction in the vicinity of the Project Site. Commercial uses are located east of the railway. Vacant land, formerly a part of the Taylor Yard, is also located to the east of the Project Site. California State Parks owns this vacant space, and this area is slated for development of a public park. The Los Angeles River is located to the south of the Project Site and runs adjacent to the Project Site's southern property line. A maintenance road, used by the surrounding community as a pedestrian path, and electricity transmission towers run between the Project Site and the Los Angeles River.

<b>COMMUNITY PLAN AREA</b> Northeast Los Angeles Community Plan Area	<b>AREA PLANNING COMMISSION/CNC</b> East Los Angeles / Atwater Village	<b>STATUS:</b> <input type="checkbox"/> PRELIMINARY <input type="checkbox"/> PROPOSED <input checked="" type="checkbox"/> ADOPTED (Adopted 1999)
<b>EXISTING ZONING</b> [Q]PF-1-CDO-RIO	<b>MAX. DENSITY ZONING</b> N/A	<input type="checkbox"/> DOES CONFORM TO PLAN <input checked="" type="checkbox"/> DOES NOT CONFORM TO PLAN
<b>PLANNED LAND USE &amp; ZONE</b> Heavy Manufacturing; M3, P	<b>MAX DENSITY PLAN</b> N/A	
<b>SURROUNDING LAND USES</b> Manufacturing, open space, public facilities	<b>PROJECT DENSITY</b> 2.02:1 (with density bonus incentive)	



#### 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 to 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

TITLE

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**EVALUATION OF ENVIRONMENTAL IMPACTS:**

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of a mitigation measure has reduced an effect from “Potentially Significant Impact” to “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, “Earlier Analysis,” 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 Analyses Used. Identify and state where they are available for review.
  - 2) Impacts Adequately Addressed. Identify which effects from the checklist below 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:
  - a) The significance criteria or threshold, if any, used to evaluate each question; and
  - b) The mitigation measure identified, if any, to reduce the impact to less than significance.

**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.

<input checked="" type="checkbox"/> Aesthetics	<input checked="" type="checkbox"/> Hazards & Hazardous Materials	<input checked="" type="checkbox"/> Recreation
<input type="checkbox"/> Agricultural and Forestry Resources	<input type="checkbox"/> Hydrology/Water Quality	<input checked="" type="checkbox"/> Transportation/Traffic
<input checked="" type="checkbox"/> Air Quality	<input checked="" type="checkbox"/> Land Use/Planning	<input checked="" type="checkbox"/> Tribal Cultural Resources
<input type="checkbox"/> Biological Resources	<input type="checkbox"/> Mineral Resources	<input checked="" type="checkbox"/> Utilities/Service Systems
<input checked="" type="checkbox"/> Cultural Resources	<input checked="" type="checkbox"/> Noise	<input checked="" type="checkbox"/> Mandatory Findings of Significance
<input checked="" type="checkbox"/> Geology/Soils	<input checked="" type="checkbox"/> Population/Housing	
<input checked="" type="checkbox"/> Greenhouse Gas Emissions	<input checked="" type="checkbox"/> Public Services	

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

<b>PROPONENT NAME</b> 2800 Casitas, LLC	<b>PHONE NUMBER</b> (212) 837-4856
<b>PROPONENT ADDRESS</b> 18 E. 50 <sup>th</sup> Street, Suite 10, New York, NY 10022	
<b>AGENCY REQUIRING CHECKLIST</b> City of Los Angeles, Department of City Planning	<b>DATE SUBMITTED</b> August 18, 2017
<b>PROPOSAL NAME (If Applicable)</b> Bow Tie Yard Lofts	

**ENVIRONMENTAL IMPACTS**

(A brief explanation of all answers is required except "No Impact" answers that are adequately supported by the information sources cited.)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>I. AESTHETICS.</b> Would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a city-designated scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**II. AGRICULTURAL 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 Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

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

**III. AIR QUALITY.** Where applicable, 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 result in:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with or obstruct implementation of the SCAQMD Air Quality Management Plan or Congestion Management Plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



c. Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Create objectionable odors affecting a substantial number of people?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**IV. BIOLOGICAL RESOURCES.** Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the City or regional plans, policies, regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**V. CULTURAL RESOURCES:** Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Cause a substantial adverse change in significance of a historical resource as defined in State CEQA §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**VI. GEOLOGY AND SOILS.** Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Exposure of 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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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?

☐ ☐ ☐ ☒

## 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?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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## VIII. HAZARDS AND HAZARDOUS MATERIALS

Would the project:

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

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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?

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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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?

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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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?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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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?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--------------------------	--------------------------	--------------------------	-------------------------------------

- |  |                                     |                          |                          |                                     |
|--|-------------------------------------|--------------------------|--------------------------|-------------------------------------|
| g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |
| 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? | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**IX. HYDROLOGY AND WATER QUALITY.**

Would the proposal result in:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially deplete groundwater supplies or interfere 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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Place housing within a 100-year flood plain as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h. Place within a 100-year flood plain structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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?

☐ ☐ ☒ ☐

**X. LAND USE AND PLANNING.** Would the project:

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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a. Physically divide an established community?

☐ ☐ ☐ ☒

b. Conflict with 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?

☐ ☐ ☒ ☐

**XI. MINERAL RESOURCES.** Would the project:

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

☐ ☐ ☒ ☐

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

☐ ☐ ☒ ☐

**XII. NOISE.** Would the project result in:

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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a. Exposure of persons to or generation of noise in level 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**XIII. POPULATION AND HOUSING.** Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Displace substantial numbers of people necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**XIV. PUBLIC SERVICES.**

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Fire protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Schools?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other Public facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**XV. RECREATION.**

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**XVI. TRANSPORTATION AND TRAFFIC.**

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Result in inadequate emergency access?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**XVII. TRIBAL CULTURAL RESOURCES**

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public				

Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

☐ ☐ ☒ ☐

b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

☒ ☐ ☐ ☐

#### **XVIII. UTILITIES AND SERVICE SYSTEMS.**

Would the project:

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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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 resource, 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?



#### **XIX. MANDATORY FINDINGS OF SIGNIFICANCE.**

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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b. Does the project have impacts which are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of an individual 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 cause substantial adverse effects on human beings, either directly or indirectly?



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

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

<b>PREPARED BY</b>	<b>TITLE</b>	<b>TELEPHONE #</b>	<b>DATE</b>
Parker Environmental Consultants		(661) 257-2282	February 16, 2017

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## **ATTACHMENT A. PROJECT DESCRIPTION**

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### **1. INTRODUCTION**

The Applicant proposes the development of a mixed-use project in the Northeast Los Angeles Community Plan area that would consist of five buildings with a total of 419 multi-family residential units (approximately 423,872 square feet) and approximately 64,000 square feet of commercial space. Commercial uses on-site may include a mix of restaurant uses, office space, and an urban farm. The proposed residential units would include a combination of 119 studios, 220 1-bedroom units, and 80 2-bedroom units in four buildings ranging from five to six stories (60 to 81 feet above grade). Eleven percent of the base-density residential units (approximately 35 units) would be reserved as Very Low Income Units. A seven-story (85 feet above grade) parking garage on the northwest end of the Project Site facing the Glendale Freeway would provide 720 on-site parking spaces for the Project Site on levels one through six and a 42,000 square foot urban farm/greenhouse on the top level. Open space areas would include approximately 58,176 square feet. Existing on-site uses, including a light manufacturing building (approximately 117,000 square feet) and its associated surface parking, would be demolished as part of the Proposed Project.

### **2. PROJECT LOCATION**

The Project Site is located within the boundaries of the Northeast Los Angeles Community Plan area in the City of Los Angeles, approximately four miles north of downtown Los Angeles. As shown in Figure 1, Project Location Map, the Project Site is located off of Casitas Avenue, which terminates at the Project Site. The Glendale Freeway (SR-2) is located to the north and west of the Project Site. The Los Angeles River is located to the south of the Project Site. A railway is located to the northeast of the Project Site.

The Project Site includes one parcel that totals approximately 248,190 square feet of gross lot area (5.7 acres)<sup>1</sup>. The Project Site includes one Assessor Parcel Number (APN): 5442-002-012.

Primary regional access to the Project Site is provided by the Glendale Freeway. The Glendale Freeway runs in a north-south direction within 110 feet to the west and northwest of the Project Site. The Glendale Freeway terminates approximately 1.5 miles to the south of the Project Site, where it connects to Glendale Boulevard. To the north of the Project Site, the Glendale Freeway continues into the Angeles National Forest and provides access to Freeway I-210. The Glendale Freeway provides access to the greater highway network of the Los Angeles metropolitan region.

Local street access is primarily provided by Casitas Avenue, which terminates at the Project Site. The City of Los Angeles Mobility Plan designates Casitas Avenue as a local street. Access to Casitas Avenue is

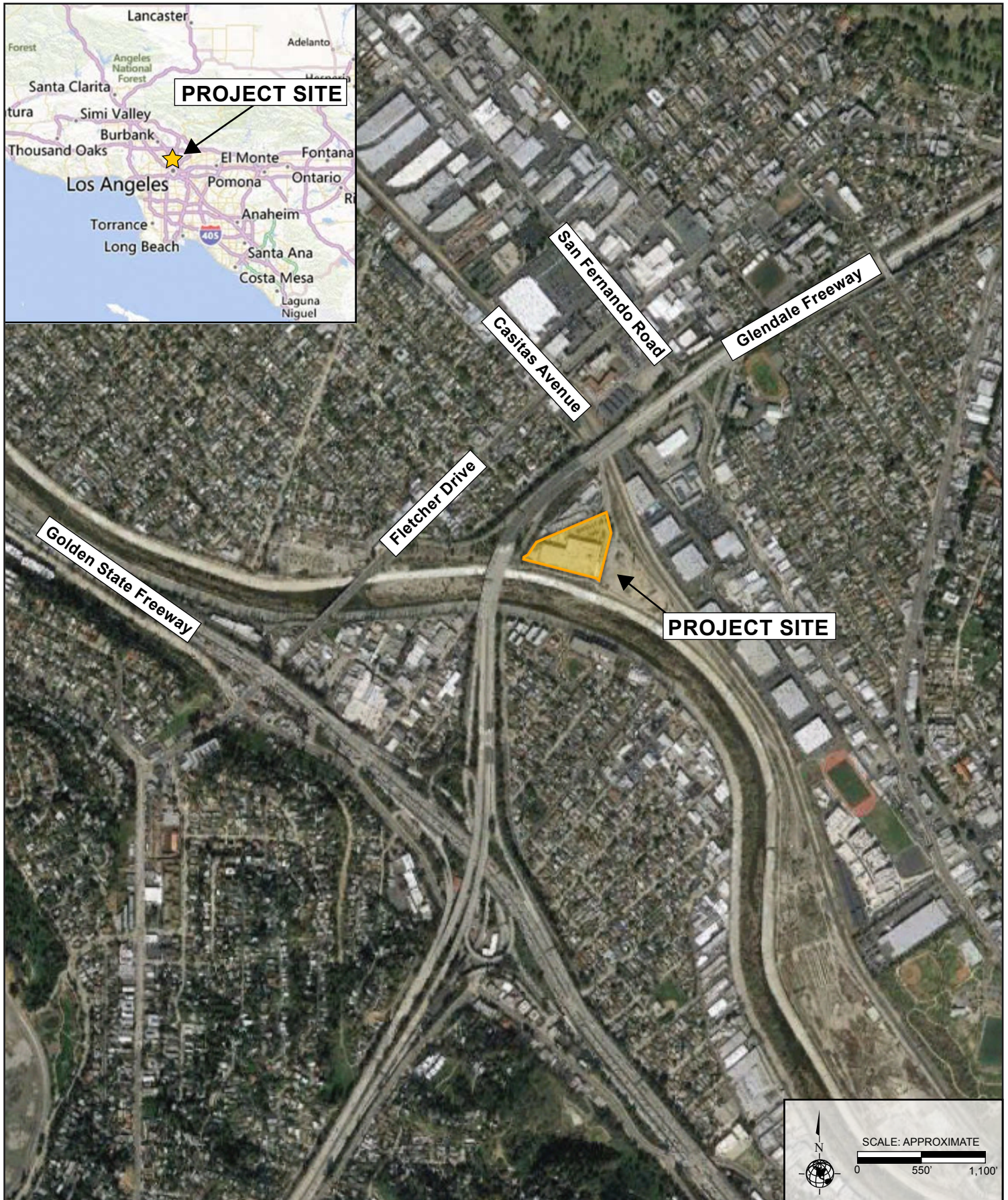
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<sup>1</sup> *City of Los Angeles Department of City Planning, Parcel Profile Reports, Zoning Information and Map Access System (ZIMAS), <http://www.zimas.lacity.org>, accessed August 2016.*

provided by the grid roadway system in the surrounding area to the north of the Project Site (and north of the Glendale Freeway).

The closest bus stop to the Project Site is located at the intersection of Fletcher Drive and La Clede Avenue, approximately 0.3 miles northwest of the Project Site. The Los Angeles County Metropolitan Transportation Authority (Metro) provides Bus Route 603 at this location. Metro Bus Route 603 provides service between the Grand / Los Angeles Trade and Technical College (LATTC) Metro Station in the City of Los Angeles and the City of Glendale.





Source: Google Maps, 2016.



### 3. ENVIRONMENTAL SETTING

#### A. Zoning and Land Use Designation

The Project Site is located within the Northeast Los Angeles Community Plan area within the City of Los Angeles. The Project Site is further located within the Cypress Park and Glassell Park Community Design Overlay District and the River Improvement Overlay District. As such, the City of Los Angeles Municipal Code, the City of Los Angeles General Plan, the Northeast Los Angeles Community Plan, the Cypress Park & Glassell Park Community Design Overlay requirements, and the River Improvement Overlay requirements guide development on the Project Site and in the Project Site area. A description of each document is provided below.

The Project Site is also located in the East Los Angeles State Enterprise Zone (ZI No. 2129) that regulates parking standards and height, a Metro Rail Project area (ZI No. 1117), and is within the jurisdiction of the Freeway Adjacent Advisory Notice for Sensitive Uses (ZI No. 2427).

##### (1) City of Los Angeles Municipal Code

The Los Angeles Municipal Code (LAMC) assists City offices, departments and other governmental agencies in their functions and serves as the official source of information regarding the regulations enacted by the City of Los Angeles for the preservation of public peace, health and safety. As it pertains to development, the LAMC sets specific requirements and standards for development projects within the City of Los Angeles, such as zoning laws, construction standards, open space, and parking requirements. The LAMC is amended by ordinances and is enforced by the City of Los Angeles.

The Project Site has a land use designation of Heavy Manufacturing and is currently zoned as [Q]PF-1-CDO-RIO<sup>2</sup>, refer to Figure II-2, below. The current zoning and land use designations on-site do not correspond with one another. The “PF” zoning is associated with a land use designation of Public Facilities and allows for the development of agricultural uses, parking under freeways, fire and police stations, government buildings, public libraries, post offices, public health facilities, and public elementary and secondary schools. As there have never been any Public Facilities on the Property, it appears that the site was inadvertently rezoned from M3 (Heavy Industrial) to PF.

The Project Site is located within Height District No. 1. Development on-site would be limited to an FAR of 1.5:1. The “CDO” designation indicates that the Project Site is located within the Cypress Park & Glassell Park Community Design Overlay District, which also sets the [Q] condition. The “RIO” indicates that the Project Site is located within the River Improvement Overlay District. The CDO and RIO designations are further explained below.

The Project Site is also located in the East Los Angeles State Enterprise Zone (ZI No. 2129) that regulates parking standards and height and is subject to the Freeway Adjacent Advisory Notice for Sensitive Uses

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<sup>2</sup> *City of Los Angeles Department of City Planning, Cypress Park & Glassell Park [Q] Conditions CPC-2008-3991-ZC, 2009.*

(ZI No. 2427). The Metro Rail Project area (ZI-1117) is in effect for development within 100 feet of a Metro Rail construction area.

## **(2) City of Los Angeles General Plan**

Whereas the LAMC is an overarching document that provides specific requirements and standards for all aspects of living, working, and city function (including development) within the City of Los Angeles, the City of Los Angeles General Plan (General Plan) is a comprehensive, long-range declaration of purposes, policies, and programs to guide future development and growth within the City. The General Plan is a dynamic document consisting of 11 elements, which include a Framework Element, Air Quality Element, Conservation Element, Housing Element, Noise Element, Open Space Element, Service Systems Element / Public Recreation Plan, Safety Element, Mobility Element, a Plan for a Healthy Los Angeles, and the Land Use Element. The Land Use Element comprises 35 Community Plans.<sup>3</sup>

As shown in Figure 2, Zoning and General Plan Land Use Designations, the Project Site consists of one parcel with a General Plan Land Use designation of Heavy Manufacturing. The Heavy Manufacturing land use designations correspond to the M3 and P zones. (The P zone allows for automobile parking on a surface parking lot or underground). The current zoning on the Project Site of PF, does not correspond with the Heavy Manufacturing land use designation.

## **(3) Northeast Los Angeles Community Plan**

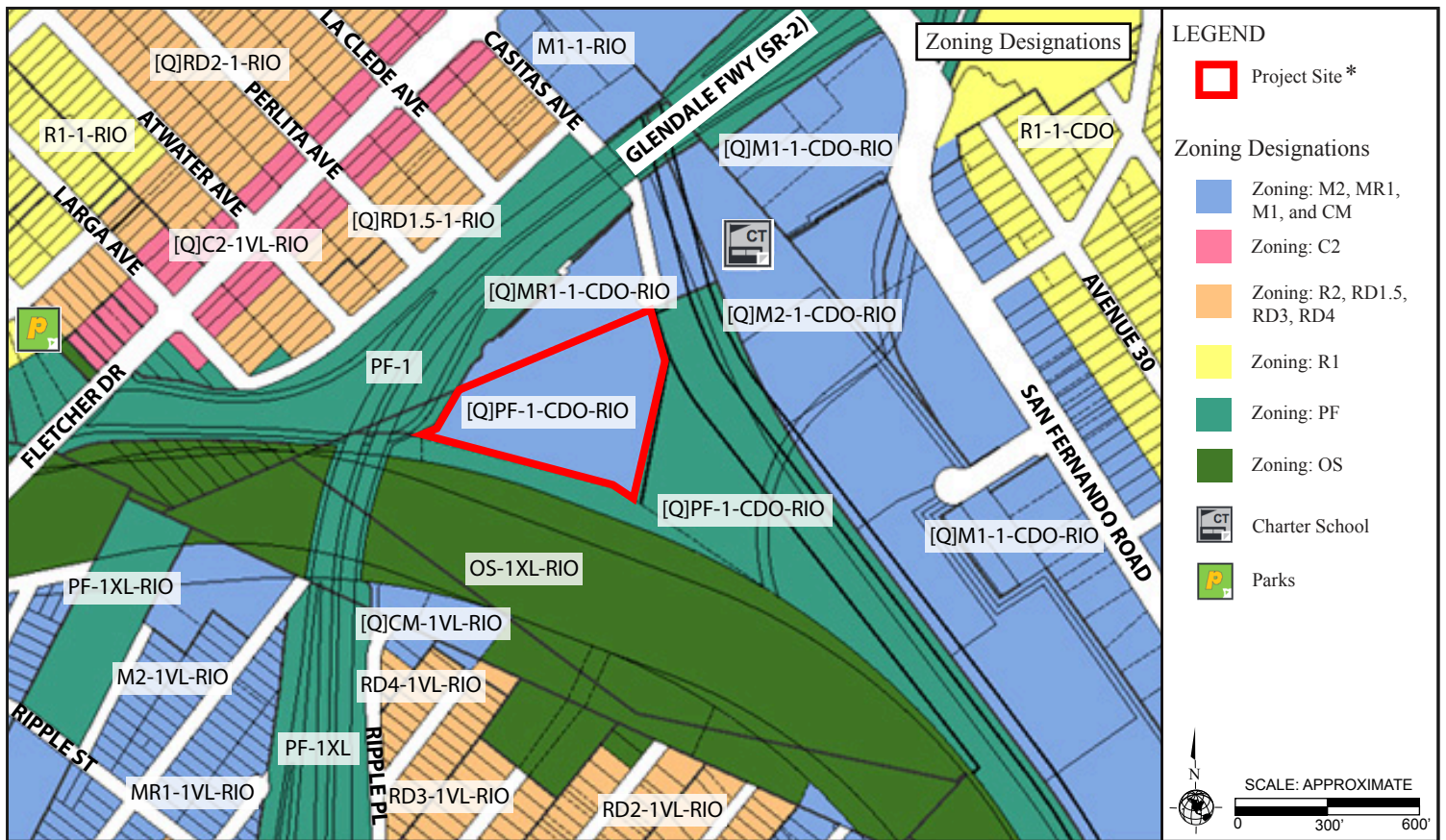
The Project Site is located in the Northeast Los Angeles Community Plan area within the City of Los Angeles. The Community Plan area (“CPA”) was greatly influenced by the development of the freeway system, suburbanization, and the decentralization of commercial and industrial land uses that followed WWII. This caused the arrangement of land uses within the CPA, and the relationship of the CPA with the rest of the expanding metropolis to change. The Northeast Los Angeles Community Plan aims to preserve and enhance the character of Northeast Los Angeles by strengthening the viability and identity of its neighborhoods and communities and to improve the quality of life for all its residents.<sup>4</sup>

Nine neighborhoods comprise the Northeast Los Angeles CPA, including Atwater Village, Cypress Park, Eagle Rock, El Sereno, Glassell Park, Highland Park, Lincoln Heights and Montecito Heights, Monterey Hills, and Mount Washington. The Project Site is located within the Atwater Village Neighborhood District. Atwater Village is in many respects the most isolated portion of the Northeast Los Angeles with respect to the rest of the CPA. Atwater Village occupies a narrow strip of level land between two major barriers, the Los Angeles River on the west and the railroad tracks on the east. The neighborhood is served by a single north-south artery, San Fernando Road, which lies immediately to the east of the railroad tracks. Major east-west arteries include Colorado Boulevard, Fletcher Drive, Los Feliz Boulevard and Glendale Boulevard. Atwater Village is generally comprised of residential, commercial, and industrial land uses.

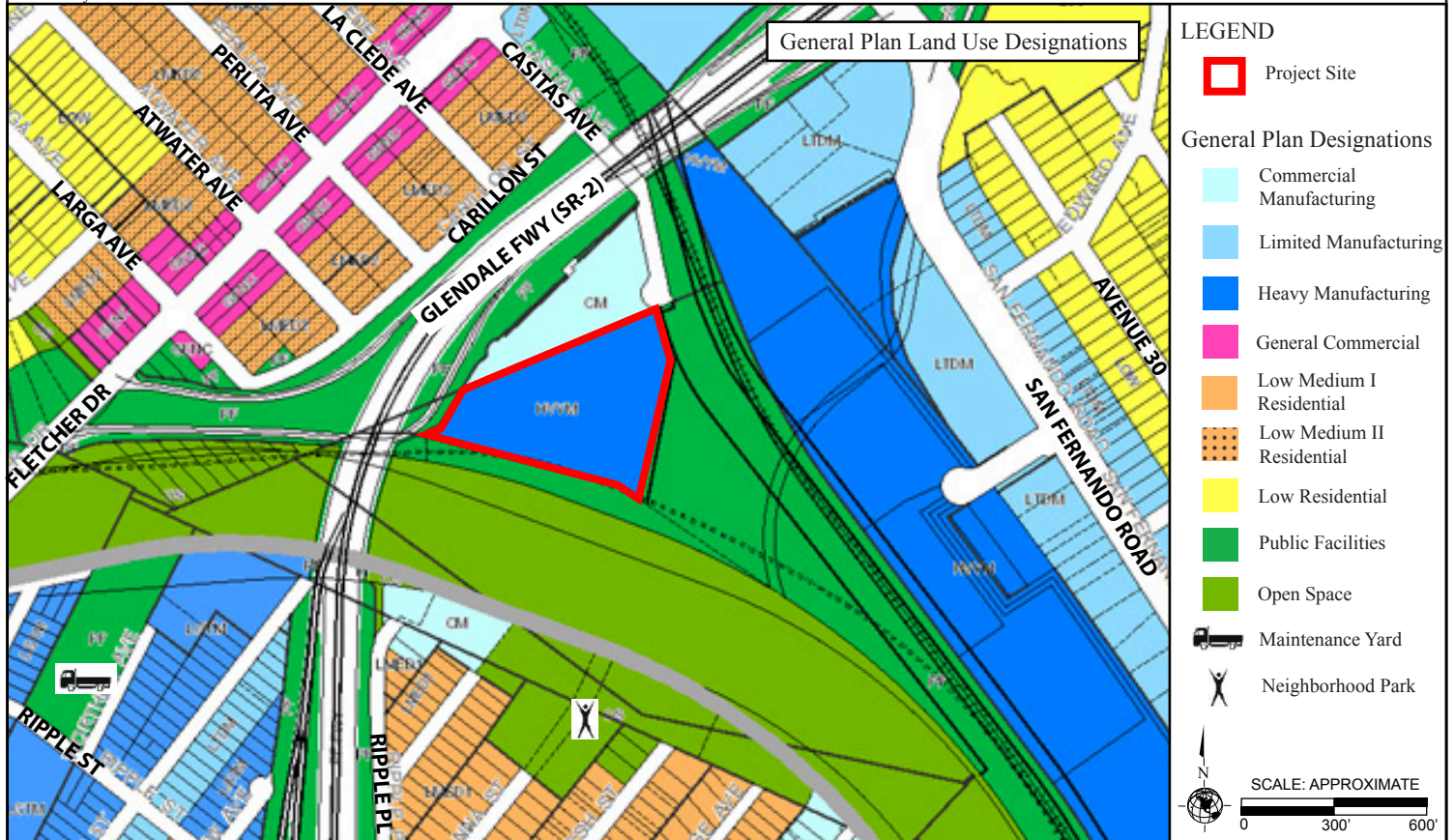
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<sup>3</sup> City of Los Angeles, Department of City Planning, *General Plan Elements*, website: [www.cityplanning.lacity.org](http://www.cityplanning.lacity.org), accessed August 2016.

<sup>4</sup> City of Los Angeles Department of City Planning, *Northeast Los Angeles Community Plan*, June 15, 1999.



\* The Project Site was zoned "PF" by Ordinance No. 181,062, which also established the [Q] condition on the Project Site. The existing zoning and land use designation on the Project Site do not currently coincide with one another.



Source: ZIMAS, City of Los Angeles, Department of City Planning, 2016.



#### **(4) Cypress Park and Glassell Park Community Design Overlay**

The Cypress Park & Glassell Park Community Design Overlay (CDO), effective by Ordinance No. 180,561, provides guidelines and standards for public and private development projects within the District. The intent of the CDO is to provide guidance and direction in the design of new buildings and the exterior remodeling and restoration of existing homes, buildings and storefronts that contribute to walkable and desirable residential neighborhoods and to the area's revival as an attractive and vital business district. In addition, the CDO aims to protect the culturally and historically significant resources in the area. The design guidelines exist as a framework for development in the CDO, and the development standards set forth requirements that bring about compliance with portions of the design guidelines.<sup>5</sup> The Cypress Park & Glassell Park CDO imposes the [Q] condition on the Project Site. The [Q] condition prohibits and/or limits various auto-related land uses within the Cypress Park & Glassell Park CDO.<sup>6</sup>

#### **(5) River Improvement Overlay District**

Effectuated by Ordinance No. 183,145 on August 2014, the River Improvement Overlay ("RIO") District enables the City of Los Angeles to better coordinate land use development along the 32-mile corridor of the Los Angeles River that flows within the City's boundaries. The RIO District is a proposed special use district that requires new development projects to follow and implement applicable design guidelines. The purpose of the RIO District is to support the goals of the Los Angeles River Revitalization Master Plan (LARRMP); contribute to the environmental and ecological health of the City's watersheds; provide native habitat and support local species; establish a positive interface between the Los Angeles River and adjacent properties; promote pedestrian, bicycle and other multi-modal connections between the river and surrounding neighborhoods; provide an aesthetically pleasing environment; provide safe, convenient access to and along the river; promote river identity; and support the City's stormwater ordinances and programs. The RIO Ordinance establishes development regulations and a process for the City Planning Commission to adopt River Design Guidelines. The River Design Guidelines are currently in draft form.<sup>7</sup>

### **B. Existing Conditions**

#### **(1) Project Site**

As shown in Figure 3, Aerial Photograph and Photograph Location Map, and Figure 4, Photographs of the Project Site, the Project Site is largely developed with a light manufacturing/warehouse/film production facility (approximately 117,000 square feet) and a surface parking lot. There is landscaping throughout the Project Site. One ingress/egress driveway is provided off of Casitas Avenue. The Project Site is currently secured with walls and fencing along the perimeter and a gated driveway. The Project Site is zoned [Q]PF-1-CDO-RIO and has a land use designation of Heavy Manufacturing.

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<sup>5</sup> City of Los Angeles Department of City Planning, *Cypress Park & Glassell Park Community Design Guidelines: Design Guidelines and Development Standards*, April 6, 2009.

<sup>6</sup> *Ibid.*

<sup>7</sup> City of Los Angeles Department of City Planning, *Los Angeles River Design Guidelines: Best Practices for "Riverly" Development (DRAFT)*, July 2014.



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**(2) Surrounding Properties**

The properties surrounding the Project Site are designated as Commercial Manufacturing, Open Space, and Public Facilities. The Glendale Freeway is located to the north and west of the Project Site. The Los Angeles River is located to the south of the Project Site. A railway is located to the northeast of the Project Site. These three features limit access to the Project Site area from the surrounding neighborhood. Access to the Project Site area is limited to Casitas Avenue. Photographs of the land uses immediately surrounding the Project Site are provided in Figure 5, Photographs of Surrounding Uses. A detailed description of surrounding land uses is provided below.

**North:** A self-storage facility abuts the Project Site to the north (refer to Figure 5, View 8 and View 9). This property is zoned [Q]MR1-1-CDO-RIO and has a land use designation of Commercial Manufacturing (CM). Access to the self-storage facility and the Project Site is limited to Casitas Avenue. The Glendale Freeway (SR-2) is located to the north and west of the Project Site and the self-storage facility. A residential community is located northwest of the Glendale Freeway. Refer to Figure 5, View 7.

**West:** An on-ramp to the Glendale Freeway immediately borders the Project Site to the west. Commercial and residential land uses are located beyond the Glendale Freeway. Refer to Figure 5, Views 7 through 9.

**South:** The Los Angeles River is located to the south of the Project Site and runs adjacent to the Project Site's southern property line. Industrial and residential uses exist south of the Los Angeles River. A maintenance road and electricity transmission towers run between the Project Site and the Los Angeles River south of the property fence. This road is also utilized as a pedestrian walkway and connected to the residential neighborhood located west of the Project Site. Additionally, the Los Angeles River Greenway Trail runs along the south side of the Los Angeles River in the vicinity of the Project Site. Refer to Figure 5, View 12.

**East:** Previously developed, vacant land zoned for public facilities is located to the east of the Project Site. California State Parks owns this vacant space that was previously a part of the Taylor Yard. This vacant area is slated for development of a public park. California State Parks and the Clockshop, an arts organization, work together on the Bowtie Project, which is a collaboration of artwork and performances and currently operates on this vacant space area. A public facilities road branches off of Casitas Avenue and continues eastward from the Project Site area. The railroad is also located east of the Project Site and runs in a northwest-southeast direction. Commercial and institutional land uses are located east of the railroad. Refer to Figure 5, View 10 and 11.



Sources: Parker Environmental Consultants, August 2016; and Google Earth, Aerial View, February 2016.





View 1: From the terminus of Casitas Avenue, looking south at the Project Site.



View 2: From the entrance gate to the Project Site, looking southwest at the Project Site.



View 3: From east of the Project Site, looking northwest at the Project Site.



View 4: From east of the Project Site, looking west along the southern end of the Project Site.



View 5: From the west side of the Project Site, looking northeast through the Project Site.



View 6: From the west side of the Project Site, looking northeast through the Project Site and along the northern property line.

Source: Parker Environmental Consultants, August 2016.





View 7: From Carillon Street, looking southwest along Carillon Street with residential uses and street parking along the west side of the street.



View 8: From the terminus of Casitas Avenue, looking north along Casitas Avenue towards the adjacent self-storage facility and Glendale Freeway (SR-2).



View 9: From the east side of Casitas Avenue, looking southwest at the self-storage facility to the north of the Project Site.



View 10: From southeast of the Project Site, looking east through the Bowtie Project area and towards the railway and land uses east of the railway.



View 11: From east of the Project Site, looking north through the Bowtie Project area and towards the railway and land uses east of the railway.



View 12: From east of the Project Site, looking west along the Los Angeles River.

Source: Parker Environmental Consultants, August 2016.

#### 4. PROJECT CHARACTERISTICS

The Proposed Project includes the demolition of the existing building and structures on the Project Site and the construction of a mixed-use development that would consist of five buildings. The Proposed Project would provide a total of 419 multi-family residential units (approximately 423,872 square feet) and approximately 64,000 square feet of commercial space. Commercial uses on site would include a mix of restaurant uses, office space, and urban farm/greenhouse. The proposed residential units would include a combination of studio, 1-bedroom, and 2-bedroom units. Eleven percent of the base-density residential units (35 dwelling units) would be reserved as very low-income units. A seven-story parking garage on the northwest end of the Project Site, would provide 720 parking spaces for the Project (refer to Figure 6, Plot Plan, below). The parking spaces would be provided on levels one through six, and an urban farm is proposed on level seven. A summary of the Proposed Project with the proposed unit mix and floor area is provided in Table 1, Proposed Development Program. Figure 6, Plot Plan, shows the general layout of the Proposed Project. Figure 7 shows the floor plan and landscape plan for the ground floor. Figure 8 shows the typical floor plan and typical landscape plan for the upper levels.

**Table 1**  
**Proposed Development Program**

Land Uses	Dwelling Units	Floor Area (Square Feet)
<b><i>Residential</i></b>		
Studio Units	119 du	--
One-Bedroom Units	220 du	--
Two-Bedroom Units	80 du	--
<b>Residential Subtotal</b>	<b>419 du</b>	<b>423,872 sf <sup>a</sup></b>
<b><i>Commercial</i></b>		
<b>Commercial Subtotal</b>	<b>--</b>	<b>64,000 sf</b>
<b>TOTAL</b>	<b>419 du</b>	<b>487,872 sf</b>
<i>Notes: du = dwelling unit; sf = square feet</i> <sup>a</sup> Includes residential amenity space <i>Source: Rios Clementi Hale Studios, September 29, 2016.</i>		

#### Floor Area Ratio

The Project Site includes a total of 248,190 gross square feet. Pursuant to the LAMC Section 12.2.1, the Project Site has an allowable floor area ratio (FAR) of 1.5 to 1. Since the Proposed Project would reserve eleven percent of its residential units as Very Low Income Units, the Proposed Project would be allowed a FAR increase of 35 percent. As such, the Proposed Project would be allowed a maximum floor area of 502,584 square feet. The Proposed Project would contain approximately 487,872 square feet of floor area. Refer to Figures 7 and 8, below, for the proposed floor plans.

#### Height

The Project Site is located in Height District No. 1. The development on the Project Site is limited by FAR and not by building height. The Proposed Project includes five buildings. Buildings B, C, and D would

include a maximum of five stories and be approximately 60 feet above grade at the parapet. Building A would include a maximum of six stories and be approximately 81 feet above grade at the parapet. The Parking Garage (Building G) would include seven stories and be approximately 85 feet above grade.

### Architectural Features

Architectural materials for the proposed buildings include medium grain finish plaster (stucco), concrete fiber board panel siding, aluminum frame casement windows, aluminum frame sliding doors, aluminum storefront glazing, roll up sectional garage door, glass, painted steel guardrail and design features, and cast-in-place concrete.

### Open Space and Landscaping

The Proposed Project seeks a zone change from [Q]PF-1-CDO-RIO that currently exists on the Project Site to a CM-1-CDO-RIO zoning designation for the construction of the proposed mixed-use development pursuant to Los Angeles Municipal Code (“LAMC”) Section 12.32.F. The Proposed Project would include 58,176 square feet of open space on the ground level, porch level, and level two. The open space requirements and amount of open space proposed are summarized in Table 2 below. As illustrated in the landscape plans, depicted in Figures 7 and 8 below, the Proposed Project would feature a variety of trees, shrubs, vines, and perennials. Proposed landscaping would also feature a variety of ornamental streetscape and common area landscaping. The Proposed Project would include a communal patio, pool deck, lounge seating, outdoor barbeque, and amenity deck. The Proposed Project would also include a community room inside Building B.

**Table 2**  
**Required and Proposed Open Space Calculations**

Required and Proposed Open Space Calculations			
Open Space Code Requirements			
Type	Number of Units	Square Feet Required <sup>a</sup>	Total Square Feet Required
Less than three habitable rooms (studio units and 1-bedroom units) <sup>b</sup>	339	100 sf / du	33,900
Three habitable rooms (2-bedroom units) <sup>b</sup>	80	125 sf / du	10,000
TOTAL			43,900
Open Space / Landscaping Features		Area Proposed (Square Feet)	
Ground Level		35,478	
Porch Level		18,888	
Second Level		3,810	
TOTAL OPEN SPACE PROPOSED		58,176	
Notes:			
<sup>a</sup> LAMC Section 12.21.G.2			
<sup>b</sup> For the purpose of applying the open space requirements of Section 12.21 G., a kitchen is not considered a habitable room. (See LAMC 12.03, Definitions)			
Source: Rios Clementi Hale Studios, September 29, 2016.			

## Parking and Access

The Proposed Project would provide a total of 720 parking spaces within the proposed parking structure, which includes residential and commercial parking spaces. With a total of 720 parking spaces provided on-site, the Proposed Project would be in compliance with the parking requirements of the City of Los Angeles Municipal Code. Vehicular access to the Project Site would be provided by a full-access driveway off of Casitas Avenue, which would provide direct access to the parking structure on-site. A separate loading driveway would be located on the west side of Building A to allow delivery trucks to temporarily park on the Project Site. A designated fire lane would transverse the middle of the Project Site and would run along the southern and eastern property lines where it connects back to Casitas Avenue. The fire lane along the southern and eastern property lines would also serve as a bike path and landscaped area for pedestrian use. A summary of the Proposed Project's required and proposed parking spaces is provided in Table 3, below.

**Table 3**  
**Summary of Required and Proposed Vehicle Parking Spaces**

Summary of Required and Proposed Vehicle Parking Spaces

Description	Quantity	Parking Required by Code <sup>a</sup>		Parking Provided
		Rate	Spaces	
<b>Residential</b>				
Less than three habitable rooms (studio units and 1-bedroom units) <sup>c</sup>	339 du	1 space / du	339	--
More than three habitable rooms (2-bedroom units) <sup>c</sup>	80 du	2 spaces / du	160	--
<b>Residential Subtotal</b>			<b>499</b>	<b>--</b>
<b>Commercial <sup>b</sup></b>				
Commercial	64,000 sf	1 space / 500 sf	128	--
<b>Commercial Subtotal</b>			<b>128</b>	<b>--</b>
<b>TOTAL</b>			<b>627</b>	<b>720</b>
<i>Notes: du = dwelling unit, sf = square feet</i>				
<i><sup>a</sup> Pursuant to LAMC Section 12.22.A.25(d)(1), Affordable Housing Incentives - Density Bonus Option 1.</i>				
<i><sup>b</sup> The Project Site is located within an Enterprise Zone, which requires a minimum of 1 space / 500 sf for all commercial uses.</i>				
<i><sup>c</sup> For the purpose of applying the automobile parking space requirements of the LAMC, any kitchen shall be considered a habitable room and, if it is a part of a room designed for other than food preparation or eating purposes, such remaining portion shall also be considered a habitable room.</i>				
<i>Source: Rios Clemente Hales Studios, September 29, 2016.</i>				

The Proposed Project would provide bicycle parking in accordance with the City's Bicycle Ordinance. As summarized in Table 4, Summary of Required and Proposed Bicycle Parking Spaces, below, the Proposed Project would be required to provide 470 bicycle spaces. The Proposed Project would provide a total of 470 bicycle parking spaces, which includes 424 long-term bicycle spaces and 45 short-term bicycle spaces, on the first level of the parking garage and in outdoor bike parking areas.

**Table 4**  
**Summary of Required and Proposed Bicycle Parking Spaces**

Description	Quantity	Bicycle Parking Requirements <sup>a</sup>		Total Spaces Required	Parking Provided
		Short Term	Long Term		
<i>Residential</i>		<i>1 space / 10 units</i>	<i>1 space / unit</i>		
Multi-family Residential	419 du	42	419	461	461
<i>Commercial</i>					
Office (1 space / 10,000 sf for short term and 1 space/5000 sf for long term)	19,000 sf	1	4	5	5
Restaurant (1 space / 2,000 sf)	3,000 sf	2	2	4	4
TOTAL		45	425	470	470
<i>Notes: du = dwelling unit, sf = square feet</i> <i><sup>a</sup> Parking requirements pursuant to LAMC Section 12.21 A.16. Fractional spaces up to and including one-half may be disregarded.</i> <i>Source: Rios Clementi Hale Studios, September 29, 2016.</i>					









Source: Rios Clementi Hale Studios, September 29, 2016.





Source: Rios Clementi Hale Studios, September 29, 2016.

## 5. DISCRETIONARY ACTIONS

### A. Lead Agency

Under CEQA, the public agency that has the principal responsibility for carrying out or approving a project is referred to as the “Lead Agency” (State CEQA Guidelines Section 15367). For purposes of the Bow Tie Yard Lofts Project, the City of Los Angeles is the primary governmental agency responsible for approving the Proposed Project. As such, the EIR must be certified and the Proposed Project must be approved by the City of Los Angeles Department of City Planning before the Proposed Project can commence. Other approvals (as needed), ministerial or otherwise, may be necessary, as the City finds appropriate in order to execute and implement the Proposed Project.

### B. Responsible Agencies

Public agencies other than the Lead Agency that have discretionary approval power or regulatory oversight over the Proposed Project or Project activities are considered “Responsible Agencies” (State CEQA Guidelines Section 15381). If the City approves the Proposed Project, subsequent implementation of various project components may require discretionary approval authority from, but not limited to, the following responsible agencies: (1) California Regional Water Quality Control Board (RWQCB) and (2) South Coast Air Quality Management District (SCAQMD).

### C. Entitlement Requests

Necessary project entitlements would be granted by the City of Los Angeles. The Applicant is seeking approval of the following entitlement requests:

- 1) Pursuant to Los Angeles Municipal Code (LAMC) Section 11.5.6, a **General Plan Amendment** to the Northeast Los Angeles Community Plan to change the land use designation from Heavy Manufacturing to Limited Industrial;
- 2) Pursuant to LAMC Section 12.32.Q, a Vesting **Zone Change** from [Q]PF-1-CDO-RIO to CM-1-CDO-RIO;
- 3) Pursuant to LAMC Section 16.05.C.1(b) of the Municipal Code, **Site Plan Review** for the development of 419 residential units and 64,000 square feet of commercial uses;
- 4) Pursuant to LAMC Section 12.24-U.26 and with the Project providing 11 percent of the total units (excluding density bonus units) as Very Low Income Units, a Conditional Use Permit to allow a density bonus (a total of 108 density bonus units) greater than the maximum permitted by LAMC Section 12.22-A-25;
- 5) Pursuant to LAMC Section 12.22.A-25 and with the Proposed Project providing 11 percent (excluding density bonus units) as Very Low Income Units, **Density Bonus Compliance Review** for an On Menu Density Bonus Incentive for a 35 percent increase in FAR – an increase from 1.5:1 to 2.02:1 FAR – and a Waiver or Modification of Development Standard Not on the Menu to use lot area as buildable area;
- 6) Pursuant to LAMC Section 13.08 **Design Overlay Plan Approval**;
- 7) Pursuant to LAMC Section 17.15, a **Vesting Tentative Tract Map** for the subdivision of one lot into one ground lot and 17 airspace lots.

On-Site Parking would be provided pursuant to LAMC Section 12.22.A.25(d)1. Other approvals (as needed), ministerial or otherwise, may be necessary, as the City finds appropriate in order to execute and implement the Proposed Project, including demolition permits, haul route approval, grading and associated building permits.

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## ATTACHMENT B. EXPLANATION OF CHECKLIST DETERMINATIONS

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### INTRODUCTION

This section of the Initial Study contains an assessment and discussion of impacts associated with the environmental issues and subject areas identified in the Initial Study Checklist (Appendix G to the State CEQA Guidelines, (C.C.R. Title 14, Chapter 3, 15000-15387). The analytical methodology and thresholds of significance are based in part on the *L.A. CEQA Thresholds Guide*. The responses below indicate those issues that are expected to be addressed in an Environmental Impact Report (EIR) and demonstrate why other issues would not result in potentially significant environmental impacts and thus do not need to be addressed further in an EIR. The questions with responses that indicate a “*Potentially Significant Impact*” do not presume that a significant environmental impact would result from the Project. Rather, such responses indicate those issues that will be addressed in an EIR with conclusions of impact reached as part of the analysis within that future document.

#### I. AESTHETICS. Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a city-designated scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Response a-b. No Impact.** A significant impact may occur if a project introduces incompatible visual elements within a field of view containing a scenic vista or substantially blocks views of a scenic vista, and if scenic resources (such as but not limited to trees, rock outcroppings and historic buildings) would be damaged and/or removed by development of the project. The Project Site is currently developed with an approximately 117,000 square foot light manufacturing/warehouse/film production building and paved surface parking. The Project Site sits adjacent to the concrete-lined Los Angeles River flood control channel and is situated on a relatively level development pad. There are no available views of the Los Angeles River through the Project Site, as such views are blocked by an existing raised earthen berm. Views through the Project Site to the mountains to the west are blocked by the existing 117,000 square foot light manufacturing/warehouse/film production building. Views through the Project Site to the mountains to the northeast are blocked by the elevated Glendale Freeway. There are no scenic resources located on

the Project Site. As noted in response to Checklist Question V, Cultural Resources, below, there are no historic resources on the Project Site. Furthermore, the Project Site is not located adjacent to or within the viewshed of a designated scenic highway.<sup>8</sup> As discussed in response to Checklist Question IV, Biological Resources, there are no protected tree species on the Project Site. Thus, no impact would occur with respect to the potential to cause an adverse effect upon a scenic resource or the potential to substantially damage scenic resources.

**Response c: Potentially Significant Impact.** A significant impact may occur if a project substantially degrades the existing visual character or quality of a project site and its surroundings. The Project Site is located just north of the Los Angeles River. The Proposed Project would include the construction of a five-building mixed-use development and would thus have the potential to alter views within the Project vicinity. Impacts associated with aesthetics and the visual character of the Project Site and impacts upon scenic resources will be further analyzed in the EIR.

**Response d: Potentially Significant Impact.** A significant impact may occur if a project introduces new sources of light or glare that would be incompatible with the areas surrounding the project site, or that would pose a safety hazard to motorists utilizing adjacent streets or freeways. Additionally, shade and shadow impacts would be considered significant if shadow-sensitive uses would be shaded by project-related structures for more than three hours between 9:00 a.m. and 3:00 p.m. between late October and early April, or for more than four hours between 9:00 a.m. and 5:00 p.m. between early April and late October. The Proposed Project would include the construction of a mixed-use development with building heights ranging between 60 to 85 feet above grade and would thus have the potential to alter shadow patterns in the immediate Project vicinity. Site improvements would also include low-level security lighting fixtures for pedestrian safety and security. The potential for light, glare, and shadows to impact adjacent properties will be analyzed within the scope of the EIR.

**II. AGRICULTURAL 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 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, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<sup>8</sup> *City of Los Angeles General Plan, Mobility Plan 2035, Appendix B, Inventory of Designated Scenic Highways and Guidelines.*

b. Conflict the existing zoning for agricultural use, or a Williamson Act Contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined by Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104 (g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response a-e: No Impact.** A significant impact may occur if a project results in the conversion of state-designated agricultural land from agricultural use to another non-agricultural use; result in the conversion of land zoned for agricultural use or under a Williamson Act contract from agricultural use to another non-agricultural use; result in the rezoning of forest land or timberland; or involve other changes in the existing environment which, could result in conversion of Farmland, to non-agricultural use. The Project Site is completely developed with a light industrial building and a surface parking lot. The Project Site is additionally located in an area zoned for public facilities and industrial land uses. The Project Site and the surrounding area are not currently used for any agricultural-related uses. Therefore, the Proposed Project would have no impact associated with the conversion of agricultural uses or forested lands to a non-agricultural use. As such, no further analysis of this issue is required.

III. AIR QUALITY. Where applicable, 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:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with or obstruct implementation of the SCAQMD Air Quality Management Plan or Congestion Management Plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

■      □      □      □

**Response a: Potentially Significant Impact.** A significant impact may occur if a project is not consistent with the applicable Air Quality Management Plan (AQMP) or would represent in some way a substantial hindrance to employing the policies or obtaining the goals of that plan. The Project Site is located within the South Coast Air Basin (Basin) and is within the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD has adopted criteria for determining the consistency with regional plans such as the 2012 AQMP. These criteria include: 1) identifying whether the project would increase the frequency or severity of existing air quality violations or cause or contribute to new air quality violations and 2) identifying whether the project would exceed the assumptions utilized in preparing the AQMP. A significant impact may also occur if a project is inconsistent with the growth assumptions upon which the regional AQMP was based. The Proposed Project has the potential to generate short-term regional and localized emissions during the construction phase and long-term regional emissions associated with the on-going operational activities of the Proposed Project. The Proposed Project's air quality impacts and consistency with the applicable AQMP will therefore be evaluated within the scope of the EIR.

**Response b: Potentially Significant Impact.** A project may have a significant impact where project-related emissions would exceed federal, state, or regional standards or thresholds, or where project-related emissions would substantially contribute to an existing or projected air quality violation. Construction of the Proposed Project has the potential to generate air quality emissions on-site during earthwork and construction related activities. The long-term operation of the Proposed Project also has the potential to generate air quality emissions. The Proposed Project's air quality emissions will be quantified and analyzed in further detail in the EIR.

**Response c: Potentially Significant Impact.** A significant impact may occur if a project adds a considerable cumulative contribution to any Federal or State non-attainment pollutant. Development of the Proposed Project has the potential to add a cumulatively considerable contribution to air quality emissions. Therefore, further analysis of this issue will be analyzed in the EIR.

**Responses d-e: Potentially Significant Impact.** A significant impact may occur if a project generates pollutant concentrations or creates objectionable odors that would significantly affect sensitive receptors. The potential of the Proposed Project to expose sensitive receptors to substantial pollutant concentrations or odorous emissions will be analyzed in the EIR.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>IV. BIOLOGICAL RESOURCES.</b> 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 by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	□	□	■	□



b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the City or regional plans, policies, regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response a: Less Than Significant Impact.** Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on biological resources if it could result in: (a) the loss of individuals, or the reduction of existing habitat, of a state or federally listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern; (b) the loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community; or (c) interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise or light) to a degree that may diminish the chances for long-term survival of a sensitive species. The Project Site is improved with a light manufacturing/warehouse/film production building and associated surface parking.

Based on the information presented in the Non-Protected Tree Report (Appendix A to this Initial Study), there are fifty-five (55) trees on site that are four-inch caliper or larger. All trees are non-protected species and include: *Schinus terebinthifolius* (4 trees), *Brachychiton populneus* (17 trees), *Laurus x Saratoga* (14 trees), *Lophostemon confertus* (14 trees), and *Syagrus romanzoffianum* (6 trees). All of the trees on-site are non-native and are not protected tree species under the City of Los Angeles Protected Tree Ordinance. Development of the Proposed Project would require the removal of all existing trees on site. The Applicant would be required to plant replacement trees at a ratio of 1 to 1 (this replacement ratio may be increased at the discretion of the City's Urban Forestry Division).

The Project Site does not contain any critical habitat or support any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. Further, no protected tree species exist on site. The Proposed Project would comply with applicable regulatory compliance measures regarding non-protected tree removal and the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R Section 10.13) to ensure that the removal of the 55 non-

protected trees on site would result in a less than significant impact. Sections 3503, 3503.5 and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory non-game birds (as listed under the Federal MBTA). With compliance with applicable regulatory compliance measures regarding non-protected tree removal and habitat modification, the Proposed Project would result in a less than significant impact.

**Response b: Less Than Significant Impact.** Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on biological resources if it could result in: (a) the loss of individuals, or the reduction of existing habitat, of a state or federally listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern; (b) the loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community; (c) the alteration of an existing wetland habitat; or (d) interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise, light) to a degree that may diminish the chances for long-term survival of a sensitive species. The Project Site is occupied by a light manufacturing/warehouse/film production building and its associated paved surface parking. Aside from landscaped areas, the Project Site is nearly 100 percent impervious. The Non-Protected Tree Report (Appendix A) determined that all trees located on site are non-protected, non-native tree species. The Project Site is located north of the Los Angeles River, which is identified as a wetland habitat by the U.S. Fish and Wildlife Service. However, no riparian or other sensitive natural vegetation communities are located on the Project Site. Further, the Proposed Project is located within the River Improvement Overlay District (RIO District) and would comply with the development and design standards of the RIO District. Therefore, implementation of the Proposed Project would not result in any adverse impacts to riparian habitat or other sensitive natural communities, and a less than significant impact would occur.

**Response c: Less Than Significant Impact.** Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on biological resources if it could result in the alteration of an existing wetland habitat. As discussed above, the Project Site is located north of the Los Angeles River, which is identified as a wetland habitat by the U.S. Fish and Wildlife Service. However, no wetlands or other sensitive natural vegetation communities are located on the Project Site. The Project Site is entirely developed with impermeable surfaces and does not contain any wetlands or natural drainage channels. Further, the Proposed Project is located within the River Improvement Overlay District (RIO District) and would comply with the development and design standards of the RIO District. Therefore, a less than significant impact to riparian or wetland habitats would occur with the implementation of the Proposed Project.

**Response d: No Impact.** Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally result in a significant impact on biological resources if it could result in the interference with wildlife movement/migration corridors that may diminish the chances for long-term survival of a sensitive species. The Project Site is located in an urbanized area of the City of Los Angeles and just north of the Los Angeles River. There are no wildlife movement/migration corridors on the Project Site. Development of the Proposed Project would be limited to the Project Site, and the Proposed Project would not interfere with the movement or flow of the Los Angeles River. Thus, the Proposed Project would not interfere with the movement of any residents or migratory fish or wildlife. Therefore, no impact would occur.

**Response e: Less Than Significant Impact.** Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project-related significant adverse effect could occur if a project causes an impact that is inconsistent with

local regulations pertaining to biological resources, such as the City of Los Angeles Protected Tree Ordinance, 177,404. The Project Site is improved with a light manufacturing/warehouse/film production building and paved surface parking. There are no protected tree species located on the Project Site. Therefore, the Proposed Project would not have the potential to conflict with the City of Los Angeles Protected Tree Ordinance. However, it is anticipated that all trees on-site would be removed during the construction of the Proposed Project. The Proposed Project would be required to comply with the Federal Migratory Bird Treaty Act and Sections 3503, 3503.5, and 3513 of the California Fish and Game Code, which prohibits take of all birds and their active nests including raptors and other migratory non-game birds. Further, the Proposed Project would be required to replace all significant (8-inch or greater trunk diameter, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground) non-protected trees on the site proposed for removal with a one to one ratio. Compliance with regulatory compliance measures would ensure that impacts upon the loss of on-site trees would be less than significant.

**Response f: Less Than Significant Impact.** A significant impact would occur if the Proposed Project is inconsistent with maps or policies of the approved local, regional or state habitat conservation plans. The Project Site is located within the River Improvement Overlay (RIO) District and is located north of the Los Angeles River. The River Improvement Overlay District was established with Ordinance No. 183145 and became effective August 20, 2014. The development of the Proposed Project would comply with the development standards and guidelines for development within the RIO district. As such, the Proposed Project would not conflict with any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan. Therefore, a less than significant impact would occur with the development of the Proposed Project.

V. CULTURAL RESOURCES. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Cause a substantial adverse change in significance of a historical resource as defined in State CEQA §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response a: No Impact.** A project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment. Section 15064.5 of the State CEQA Guidelines defines an historical resource 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.

Generally, properties eligible for listing in the National Register are at least 50 years old. The California Office of Historic Preservation generally recommends an evaluation of buildings and structures older than 45 years of age by professionals meeting the Secretary of the Interior Standards Professional Qualifications for Architectural History and Archeology. The existing building on-site was constructed in 1999, approximately 17 years ago. According to the City of Los Angeles Zoning Information and Map Access System (ZIMAS) and the Los Angeles Historic Resources Inventory, neither the Project Site nor the building on-site is identified on any historic resource lists or databases. Further, a database search of the California Historical Resources Information System (CHRIS), conducted by the South Central Coastal Information Center (SCCIC) indicates that there are no known historical resources within the Project Site.<sup>9</sup> Since the existing building on-site was constructed in 1999, and results from ZIMAS and Los Angeles Historic Resources Inventory and the CHRIS database searches indicate that the existing site or building are not identified as an historic resources or cultural landmark, no impact to historic resources would occur.

**Response b: Less Than Significant Impact with Mitigation Incorporated.** A significant adverse effect could occur if grading or excavation activities associated with a project could disturb archaeological resources, which is defined by CEQA Guidelines Section 15064.5(a)(3)(D) as an resource that "has yielded, or may be likely to yield, information important in prehistory or history." The Project Site is currently developed with an existing warehouse/manufacturing building and surface parking lot. The Project Site does not contain any known archaeological sites or archaeological survey areas.<sup>10</sup> A database search of the California Historical Resources Information System (CHRIS), conducted by the South Central Coastal Information Center (SCCIC) indicates that there are no known archaeological resources or historical resources on the Project Site.<sup>11</sup> The SCCIC records search response letter recommends that, due to its proximity to the Los Angeles River, and the project location's historical association with railroad activity, the Project Site is potentially sensitive for cultural resources. Therefore, a qualified cultural resources consultant should be retained to do a study. However, further study requiring evaluation of buried deposits is precluded by the existing development and asphalt surfaces that cover the entire site. Further, based on a review of the preliminary geotechnical site investigation,<sup>12</sup> the Project Site is substantially underlain by undocumented fill material to a depth of 1 to 14 feet, which will likely need to be removed and recompacted to support shallow building foundation systems. Excavation into the native soil below documented fill material is not anticipated, except in limited areas beneath the proposed seven-story parking structure and within the footprint of the existing warehouse/production building. Thus, based on the lack of archaeological resources being discovered during prior development and the lack of any known recorded cultural resources being recorded on the Project Site or within ¼-mile of the Project Site, there would be a low probability of encountering archaeological resources during construction.

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<sup>9</sup> South Central Coastal Information Center (SCCIC), California State University, California Historical Resources Information System (CHRIS), Records Search Results for the Bow Tie Yard Lofts Project October 6, 2016. (See Appendix B to this Initial Study)

<sup>10</sup> City of Los Angeles, Department of City Planning, "Prehistoric and Historic Archeological Sites and Service Areas in the City of Los Angeles," 1996.

<sup>11</sup> Ibid.

<sup>12</sup> LGC Geotechnical Inc., Geotechnical Due-Diligence Report for Proposed Five-Story Apartment Structure and adjacent Six-Story Parking Structure, June 1, 2016. This report is included in Appendix C of this Initial Study.

## Mitigation Measures

**MM A-1:** In the unlikely event that archaeological resources are encountered during the construction phase, all further ground-disturbing activities in the area of the find shall be halted 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 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.

**MM A-2:** 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

**MM A-3:** 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.

Incorporation of these mitigation measures 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: Potentially Significant Impact.** A significant adverse effect could occur if grading or excavation activities associated with a project could disturb paleontological resources or geologic features. The Proposed Project would involve excavation, grading, and earthwork for the proper base and slope for the proposed buildings. The Project Site is not located in an area identified as potentially containing significant paleontological resources or geologic features.<sup>13</sup> The Project Site has already been developed and is surrounded by urban development and areas that have experienced grading and earthwork activities. While there is no evidence to suggest that such resources are located on-site, there is still a possibility that the construction phase of the Proposed Project could encounter paleontological or geologic resources during construction. A records search conducted by the Natural History Museum of Los Angeles County will provide information on the presence or absence of such materials. This issue will be analyzed within the scope of the EIR.

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<sup>13</sup> *City of Los Angeles General Plan Framework Element, Vertebrate Paleontological Resources in the City of Los Angeles, Figure CR-2, 1996.*

**Response d: Less Than Significant Impact.** A significant adverse effect could occur if grading or excavation activities associated with a project could disturb human remains. Based on a database search of the California Historical Resources Information System (CHRIS), by the SCCIC, no known cultural or archaeological sites have been recorded within the Project Site. As discussed under Checklist Question V.e, AB 52 Tribal Consultation Letters were submitted to local tribal representatives registered on the National American Heritage Commission's contact list. As no known Native American Tribal Resources or internment sites are known to occur within the Project Site, and the site is known to be underlain with 1 to 14 feet of fill materials associated with prior development, potential impacts upon the discovery of human remains is low and would be considered less than significant. In the unlikely event that any human remains are encountered unexpectedly during construction, demolition, and/or grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code (PRC) Section 5097.98. No further actions or mitigation measures beyond complying with applicable California Public Resources Code and California Health and Safety Code requirements are required. As such no further analysis on this issue is required.

VI. GEOLOGY AND SOILS. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Exposure of 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-d: Potentially Significant Impact.** The Project Site is located within a seismically active region, as is all of southern California. The Proposed Project's impacts upon ground rupture, ground shaking, liquefaction, landslides, soil erosion, soil instability, and expansive soils will be evaluated by a qualified geotechnical engineer,. The Proposed Project's geological impacts will be analyzed in the EIR based on additional site-specific data collected at the Project Site.

**Response e: No Impact.** This question would apply to a project only if it is located in an area not served by an existing sewer system. The Project Site is located in an urban area served by a wastewater collection, conveyance, and treatment system operated by the City of Los Angeles. No septic tanks or alternative disposal systems are necessary, nor are they proposed. Therefore, no impact would occur, and no further analysis is required.

## 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 gasses?



**Responses a-b: Potentially Significant Impact.** Global climate change describes alterations in weather features (e.g., temperature, wind patterns, precipitation, and storms) that occur across the Earth as a whole. Global temperatures are modulated by naturally occurring components in the atmosphere (e.g., water vapor, carbon dioxide [CO<sub>2</sub>], methane [CH<sub>4</sub>], and nitrous dioxide [N<sub>2</sub>O]) that capture heat radiated from the Earth's surface, which in turn warms the atmosphere. This natural phenomenon is known as the "greenhouse effect." Excessive human-generated greenhouse gas emissions can affect the global climate. Construction and operation of the Proposed Project has the potential to generate greenhouse gas emissions, either directly or indirectly, which may have a significant impact on the environment. Thus, the Proposed Project's generation of greenhouse gas emissions and consistency with applicable plans, policies and regulations adopted for the purpose of reducing the emission of greenhouse gases will be analyzed in the EIR.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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<b>VIII. HAZARDS AND HAZARDOUS MATERIALS.</b> Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Responses a-d: Potentially Significant Impact.** Preliminary investigation shows that the Project Site was formerly a part of the Taylor Yard, which was used for the maintenance and repair needs of the Union Pacific Railroad Company until the construction of the existing building on-site in 1999. Previous operations conducted on the Project Site likely included equipment fabrication and railroad maintenance. The EIR will provide analysis and discussion addressing the potential hazards associated with the construction and operation and will take into consideration compliance with regulatory requirements.

**Responses e and f: No Impact.** The Burbank Bob Hope Airport is the closest airport to the Project Site and is located approximately 9 miles northwest from the Project Site. The Project Site is not located near any private



airstrips. No impacts involving airport-related safety hazards would occur, and no further analysis in the EIR is required.

**Response g: Potentially Significant Impact.** A significant impact may occur if a project interferes 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 Proposed Project would involve new driveways and curb cuts to access the on-site parking structure. Construction of the Proposed Project may require temporary and/or partial road closures due to construction activities. As such, any impacts to emergency response or evacuation plans caused by the Proposed Project will be further analyzed in the EIR.

**Response h: No Impact.** A significant impact may occur if a project is located in close 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 located in an urbanized area within the City of Los Angeles and is not located in a very high fire hazard severity zone<sup>14</sup>. As such, the Proposed Project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires, and therefore this issue does not require further analysis in the EIR.

IX. HYDROLOGY AND WATER QUALITY. Would the proposal result in:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially deplete groundwater supplies or interfere 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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

<sup>14</sup> City of Los Angeles Department of City Planning, ZIMAS, <http://zimas.lacity.org/>, accessed November 9, 2016.

f. Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Place housing within a 100-year flood plain as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h. Place within a 100-year flood plain structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
j. Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Responses a and f: Less Than Significant.** Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on surface water quality if discharges associated with the project create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable National Pollution Discharge Elimination System (NPDES) stormwater permit or Water Quality Control Plan for the receiving water body. A significant impact may occur if a project discharges water which 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 the project does not comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB) through its nine Regional Boards. The Project Site falls within the jurisdiction of the Los Angeles Regional Water Quality Control Board (RWQCB). These regulations include compliance with the Low Impact Development Ordinance (LID Ordinance) and Standard Urban Storm Water Mitigation Plan (SUSMP) requirements to reduce potential water quality impacts.

As required under the National Pollution Discharge Elimination System (NPDES), the Proposed Project would be responsible to prepare a Storm Water Pollution Prevention Plan (SWPPP) and implement best management practices (BMPs) to mitigate the effects of erosion and the inherent potential for sedimentation and other pollutants entering the stormwater system. The Project Site is located adjacent to the Los Angeles River Flood Control Channel and, as such, has the potential to impact the quality of surface water runoff during construction and operation. Although the Project Site is currently developed with an approximate 117,000 square foot light manufacturing/warehouse building and paved surface parking areas, construction of the project has the potential to alter the quantity and quality of surface water flows. With Implementation of SWPPP and compliance with the NPDES and City discharge requirements, and the City of Los Angeles's Low Impact Development (LID) Ordinance (No. 181899), impacts to water quality standards and requirements would be less than significant, and no mitigation measures would be required.

**Response b: Less Than Significant Impact.** Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on groundwater level if it could change potable water levels sufficiently to: (a) reduce the ability of a water utility to use the groundwater basin for public water supplies, conjunctive use purposes, storage of imported water, summer/winter peaking, or respond to emergencies and

drought; (b) reduce yields of adjacent wells or well fields (public or private); (c) adversely change the rate or direction of flow of groundwater; or (d) result in demonstrable and sustained reduction in groundwater recharge capacity.

Preliminary geological research shows that historic high groundwater on-site is approximately 25 feet below grade. The Proposed Project includes surface earthwork activity to ensure the proper base and slope for the proposed buildings. The Proposed Project would only include above grade levels. Therefore, the Proposed Project would not interfere with groundwater on-site. Additionally, the Project Site is largely impervious and existing water runoff is directed toward surrounding stormwater infrastructure. Therefore, the development of the Proposed Project would not interfere with groundwater recharge. The Proposed Project would not have the potential to deplete groundwater supplies or interfere with groundwater recharge. A less than significant impact would occur, and no further analysis is required on this issue.

**Response c: Less Than Significant Impact.** A significant impact may occur if a project results in a substantial alteration of drainage patterns that could result in a substantial increase in erosion or siltation during construction or operation of the project. The Project Site is located in an urbanized area within the City of Los Angeles. There are no natural watercourses on the Project Site, and the Project Site is approximately 100 percent impervious. The Proposed Project would reduce the amount of impervious surfaces on the Project Site. Therefore, development of the Proposed Project would not increase site runoff or result in any changes to the local drainage patterns. The Proposed Project would be required to prepare a SWPPP and implement BMPs to reduce runoff and preserve water quality during construction of the Proposed Project. Further, the Proposed Project would be required to implement an LID Plan (during the Project's operation), which would reduce the amount of surface water runoff leaving the Project Site after a storm event. The LID Plan would require the implementation of stormwater best management practices to retain or treat the runoff from a storm event producing  $\frac{3}{4}$ -inch of rainfall in a 24-hour period. Additionally, because the current onsite building and parking lots were developed prior to current LID requirements and do not currently operate under a SUSMP, the implementation of operational BMPs would improve the quality of stormwater runoff from the Project Site when compared to existing conditions. Therefore, the Proposed Project would result in a less than significant impact in relation to surface water hydrology and would not result in substantial erosion or siltation on- or off-site. No further analysis on this issue is required.

**Response d: Less Than Significant Impact.** Based upon the criteria established in the L.A. CEQA Thresholds Guide, a project would normally have a significant impact on surface water hydrology if it could result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow. The Project Site is relatively level and is nearly 100 percent impervious. Stormwater runoff is directed to the stormwater lines in the vicinity of the Project Site. An existing, 66-inch diameter storm drain line extends along Casitas Avenue, runs along the east side of the Project Site, and continues southward.<sup>15</sup> The City of Los Angeles owns and maintains the storm drain line. As discussed above, the Proposed Project would reduce the amount of impervious surfaces on the Project Site. Stormwater would continue to flow into the City's storm drain system via catch basins on the adjacent streets. There is currently no known deficiency in the stormwater system serving the Project vicinity. Final plan check by the Bureau of Engineering would ensure that adequate capacity is available in the storm drain system in this system prior to Project approval. The Applicant would be responsible for providing the necessary storm drain infrastructure improvements to connect with the existing drainage system serving the Project Site. Further, the Proposed Project would implement a SWPPP and a LID Plan

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<sup>15</sup> City of Los Angeles Department of Public Works, Bureau of Engineering, NavigateLA, website: <http://navigatela.lacity.org/navigatela/>, accessed September 2016.

and would not substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or –off-site. Further, construction of the Proposed Project would be contained within the Project Site and would not impact the flow of the Los Angeles River. As such, a less than significant impact would occur, and no further analysis is required on this issue.

**Response e: Less Than Significant Impact.** Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on surface water quality if discharges associated with the project could create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable National Pollution Discharge Elimination System (NPDES) stormwater permit or Water Quality Control Plan for the receiving water body. For the purpose of this specific issue, a significant impact may occur if the volume of storm water runoff from the Project Site were to increase to a level that exceeds the capacity of the storm drain system serving the Project Site. A Project-related significant adverse effect would also occur if the Proposed Project would substantially increase the probability that polluted runoff would reach the storm drain system.

A 66-inch diameter storm drain line, which is owned and maintained by the City of Los Angeles, is located adjacent to the Project Site along Casitas Avenue and along the eastern side of the Project Site. The Project Site is currently approximately 100 percent impervious and all surface water is directed off-site to the adjacent storm drain system. The Proposed Project would not result in a significant increase in site runoff, or any changes in the local drainage pattern. Runoff from the Project Site is currently and would continue to be collected on the Project Site and directed towards existing storm drain inlets in the Project vicinity. There are no known deficiencies in the local stormwater system. Pursuant to local practice and City policy stormwater retention will be required as part of the Low Impact Development (LID) Ordinance/SUSMP implementation features (despite no increased imperviousness of the site). Any contaminants gathered during routine cleaning of construction equipment would be disposed of in compliance with applicable stormwater pollution prevention permits.

Further, any pollutants from the parking areas would be subject to the requirements and regulations of the NPDES and applicable LID Ordinance. Accordingly, the Proposed Project would be required to demonstrate compliance with LID Ordinance standards and retain and treat the first  $\frac{3}{4}$  inch of rainfall in a 24-hour period, which would reduce the Proposed Project's impact to the stormwater infrastructure. Therefore, the Proposed Project would not 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 and potential impacts to surface water quality would be less than significant. No further analysis of this issue is required.

**Response f:** (see above – Responses a and f)

**Response g-j: Less than Significant Impact.** The City of Los Angeles General Plan Safety Element indicates that the Project Site is located within a potential inundation area. However, according to FEMA's Flood Insurance Rate Map, the Project Site is Zone X, which signifies that the Project Site is determined to be outside the 100 and 500 year flood zone.<sup>16</sup> Additionally, the City of Los Angeles Zoning Information and Map Access System (ZIMAS) indicates that floodwater would be contained in storm drains and there is no need to refer to the Bureau of

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<sup>16</sup> Federal Emergency Management Agency (FEMA), *Flood Insurance Rate Map, Panel Number 06037C1610F*, September 26, 2008, website: <http://dpw.lacounty.gov/wmd/floodzone/>, accessed September 2016.

Engineering.<sup>17</sup> Thus, the Project would not place housing within a 100-year flood plain, and the Proposed Project would result in a less than significant impact with respect to flooding and inundation. The Project Site is located more than 15 miles inland from the Pacific Ocean and has a mean sea level of approximately 265 to 370 feet above mean sea level. Furthermore, the Project Site is not within the vicinity of a foothill or hillside area and thus would not be exposed to mudflows. Therefore, no further analysis in the EIR is required.

X. LAND USE AND PLANNING. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response a: No Impact.** 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 that involved a continuous right-of-way such as a roadway that would divide a community and impede access between parts of the community). The Project Site is uniquely located on a property that is encumbered by a number of man-made barriers that separate the site from surrounding neighborhoods. The properties surrounding the Project Site are designated as Commercial Manufacturing, Open Space, and Public Facilities. The Project Site is immediately bordered by a self-storage facility and the Glendale Freeway to the north. The Glendale Freeway also borders the Project Site to the west. The Los Angeles River is located to the south of the Project Site. The Southern Pacific railway easement borders the Project Site to the east. These three features limit access to the Project Site area from the surrounding neighborhood. In addition, vehicular access to Project Site area is limited to Casitas Avenue. All development associated with the Proposed Project would be confined to the existing Project Site and would not disrupt or divide the physical arrangement of the established community. Therefore, no further analysis in the EIR is required.

**Response b: Potentially Significant Impact.** A significant impact may occur if the Proposed Project is inconsistent with the General Plan, zoning designation, the RIO Ordinance, the Cypress Park and Glassell Park Community Design Overlay (CDO) design guidelines and development standards, or other planning policies, plans, or regulations that are applicable to the Project Site. Applicable policies or regulations are designed to avoid or mitigate potential

<sup>17</sup> City of Los Angeles Department of City Planning, ZIMAS, <http://zimas.lacity.org/>, accessed November 9, 2016.



adverse environmental effects. As discussed above, the Project requests several discretionary approvals, including a General Plan Amendment to the Northeast Los Angeles Community Plan to change the land use designation from Heavy Manufacturing to Limited Industrial and a Vesting Zone Change from [Q]PF-1-CDO-RIO to CM-1-CDO-RIO. As such, the EIR will provide an analysis of the Proposed Project's consistency with the applicable plans, planning policies, and regulations. The EIR will also provide a discussion of the Proposed Project's discretionary entitlement requests and how they relate to the aforementioned plans.

**Response c: Less Than Significant Impact.** As discussed in Question IV(f) above, the Proposed Project is located within a RIO District, and thus, the Proposed Project would have to comply with the applicable provisions of the RIO Ordinance (No. 183,145). The RIO Ordinance supports the Los Angeles River Revitalization Master Plan, which serves to improve the environment, enhance water quality, improve water resources, and improve the ecological function of the Los Angeles River and surrounding habitat. Therefore, the Proposed Project would have a less than significant impact on applicable habitat conservation plans and natural community conservation plans, and no further analysis of this issue in the EIR is required.

XI. MINERAL RESOURCES. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response a-b: Less Than Significant Impact.** A significant impact may occur if a project is located in an area used or available for extraction of a regionally-important mineral resource, or if the project converts an existing or future regionally-important mineral extraction use to another use, or if the project would affect access to a site used or potentially available for regionally-important mineral resource extraction. The Project Site is not located within the mapped boundaries of an oil field or oil drilling area.<sup>18</sup> Although the Project Site is located within a designated mineral resource zone (MRZ-2), mineral extraction activities do not currently exist on the Project Site or in the immediate Project Site area. Thus, the development of the Proposed Project would not result in the loss of availability of a known mineral resource or locally-important mineral resource. As such, the Proposed Project would result in a less than significant impact to mineral resources, and no further analysis of these issues is required.

<sup>18</sup> *City of Los Angeles General Plan, Oil Field and Oil Drilling Areas in the City of Los Angeles. Safety Element, Exhibit E.*

XII. NOISE. Would the project result in:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Exposure of persons to or generation of noise in level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Exposure of people to or generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response a: Potentially Significant Impact.** Construction of the Proposed Project would require the use of construction equipment during grading, hauling, establishing of building foundations, installation of utility lines and services, and other construction activities. The potential exists for construction noise to be generated in excess of the noise standards established by the City of Los Angeles. Therefore, further analysis of this issue will be included within the scope of the EIR.

**Response b: Potentially Significant Impact.** A significant impact would occur if the Proposed Project exposes people to or generated excessive groundborne vibration or groundborne noise levels. Vibration is sound radiated through the ground. The rumbling sound caused by the vibration of surfaces is called groundborne noise. The ground motion caused by vibration is measured as particle velocity in inches per second and in the United States is referenced as vibration decibels (VdB). Construction of the Project has the potential to generate groundborne vibration that could impact surrounding land uses. The EIR will further analyze the Proposed Project's potential to generate excessive vibration and groundborne noise and the potential impact on surrounding land uses during construction.

**Responses c-d: Potentially Significant Impact.** A significant impact may occur if the Proposed Project results in a

substantial temporary or permanent increase in ambient noise levels in the Project vicinity. The Project's construction and operational activities, such as traffic and increased human activity on-site associated with the Proposed Project's residential and commercial activities have the potential to increase ambient noise levels above existing levels. Therefore, further analysis of this issue will be included within the scope of the EIR.

**Response e: No Impact.** 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 near the Project Site. The Project Site is not located within an airport land use plan. The Burbank Bob Hope Airport is the closest airport to the Project Site and is located approximately nine miles from the Project Site. Therefore, no impact would occur, and no further analysis of this issue in the EIR is required.

**Response f: No Impact.** A significant impact may occur if the Project Site is within the vicinity of a private airstrip. The Project Site is not located in the vicinity of a private airstrip. Therefore, no impact would occur and no further analysis is required.

XIII. POPULATION AND HOUSING. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Displace substantial numbers of people necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response a: Potentially Significant Impact.** A significant impact may occur if a project provides new development such as homes, businesses, or infrastructure and substantially induces population growth that would otherwise not have occurred as rapidly or in as great a magnitude. The Proposed Project includes the construction of a mixed-use development. The Proposed Project would include a total of 419 multi-family residential units and approximately 64,000 square feet of commercial space. As such, the Proposed Project would directly and indirectly contribute to population growth in the Northeast Los Angeles CPA. Based on the Northeast Los Angeles' current household demographics (3.38 persons per dwelling unit for the Northeast Los Angeles CPA), the construction of 419 dwelling units would result in an increase of approximately 1,416 residents.<sup>19</sup> The population and housing impacts generated by the Proposed Project will be evaluated in the EIR.

<sup>19</sup> Based on a generation rate of 3.38 residents per dwelling unit. Los Angeles Department of City Planning Demographic Research Unit, Local Estimates (Effective October 1, 2009)/Household Population/Northeast Los Angeles Community Plan Area, accessed August 2016.

**Response b and c: No Impact.** A significant impact may occur if a project could result in the displacement of existing housing or a substantial number of people, necessitating construction of replacement housing elsewhere. The Project Site is currently developed with an existing approximately 117,000 square foot light manufacturing building. The Proposed Project would include the demolition of the existing light manufacturing building and the construction of a mixed-use development. Since neither dwelling units nor residents are currently on-site, the Proposed Project would not displace any housing or residents and would not necessitate the construction of replacement housing elsewhere. No impact would occur, and no further analysis on this issue in the EIR is required.

#### XIV. PUBLIC SERVICES.

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Fire protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Schools?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other Public facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

#### **Response a:**

**Fire Protection: Potentially Significant Impact.** A significant impact may occur if the City of Los Angeles Fire Department (LAFD) could not adequately serve a project based upon response time, access, or fire hydrant/water availability during project operations. The Project Site is located within the LAFD Central Bureau service area. LAFD Station No. 50, located at 3036 Fletcher Drive, currently serves the Project Site. The Proposed Project would result in an increase of approximately 1,416 residents. The potential impact of the Proposed Project on fire protection services will therefore be analyzed in the EIR.

**Police Protection: Potentially Significant Impact.** A significant impact may occur if the City of Los Angeles Police Department (LAPD) could not adequately serve the Proposed Project, necessitating a new police station or physically alter an existing police station. If existing service capacities are exceeded, new facilities, equipment and/or personnel may be required to maintain acceptable response times and service levels. LAPD Northeast Community Police Station, located at 3353 San Fernando Road, currently serves the Proposed Project. The Proposed Project would result in an increase of approximately 1,416 residents. The potential impact of the Proposed Project on police protection services will therefore be analyzed in the EIR.

**Schools: Potentially Significant Impact.** 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 Proposed Project includes the construction of a mixed-use development with 419 multi-family residences and an increase of approximately 1,416 residents. The Project would result in a net increase of at least 75 residential units and may increase the demand for public school facilities<sup>20</sup>. Thus, pursuant to the LA CEQA Thresholds Guide, the potential impact of the Project on school facilities will be analyzed in the EIR.

**Parks: Potentially Significant Impact.** A significant impact would occur if the available City of Los Angeles Department of Recreation and Parks (RAP) services could not accommodate the projected population increase resulting from the implementation of a project, or if the Proposed Project results in the construction of new recreation and park facilities that could create significant direct or indirect impacts to the environment. Preliminary research shows that there are approximately 727.92 acres of parkland and recreational facilities within an approximate 2-mile radius from the Project Site. As discussed above, the Proposed Project would generate approximately 1,416 residents on-site. Therefore, the Proposed Project would increase the utilization of the Project Site. The Proposed Project would include the development of approximately 58,176 square feet of amenities and passive open space on-site. Additionally, the Proposed Project would provide access to the pedestrian trail that is adjacent to the Project Site's southern property line. The payment of Quimby Fees and the development of open space on-site would offset the Proposed Project's demand on public recreation facilities and parks. However, since the Proposed Project would increase the utilization of the Project Site compared to existing conditions, the potential impact of the Proposed Project on park and recreation facilities will be analyzed within the scope of the EIR.

**Other Public facilities: Potentially Significant Impact.** A significant impact would occur if a project could result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, and the construction of which that would cause significant environmental impacts. Since the Proposed Project would increase the utilization of the Project Site compared to existing conditions, the potential impact of the Proposed Project on library services would be analyzed in the EIR.

## XV. RECREATION.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<sup>20</sup> *City of Los Angeles L.A. CEQA Thresholds Guide. K.3. Public Schools, 1. Initial Study Screening Process. 2006. Pg. K.3-1.*



**Response a: Potentially Significant Impact.** A significant impact may occur if a project could result in substantial employment or population growth that could generate an increased demand for public park and recreational facilities that would exceed the capacities of existing facilities and/or cause premature deterioration of the park and recreational facilities or the need for new facilities. The Proposed Project would develop approximately 419 dwelling units and would generate approximately 1,416 new residents on a Project Site that is currently developed with a light manufacturing building and surface parking lot. Therefore, the Proposed Project would increase the utilization of the Project Site. The Proposed Project would be required to pay all applicable Quimby Fees and would include the development of approximately 58,176 square feet of amenities and passive open space on-site, which would offset the demand on public recreational facilities and parks. However, since the Proposed Project would increase the utilization of the Project Site compared to existing conditions, the potential impact of the Proposed Project on neighborhood and regional parks or other recreational facilities will be analyzed in the EIR.

**Response b: Potentially Significant Impact.** The Project would include private recreational facilities for the use of Project residents and guests. The potential environmental impacts of constructing these facilities are analyzed throughout this Initial Study, and will be further analyzed in the EIR for those topics where impacts could be potentially significant, as part of the overall Project.

<b>XVI. TRANSPORTATION AND TRAFFIC.</b> Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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: Potentially Significant Impact.** A significant impact may occur if the project conflicts 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, freeways, pedestrian and bicycle paths, and mass transit. The Proposed Project would include the development of a mixed-use project that would add 419 residential units and 64,000 square feet of commercial space on-site. Development of the Proposed Project would increase the utilization of the Project Site. As such, the Proposed Project would have the potential to increase vehicle trips to and from the Project Site, increase pedestrian activity on the Site and in the Project Site area, and increase demand for mass transit within the Project area. The Proposed Project would have the potential to impact the circulation system and area roadways. The Proposed Project's consistency with applicable plans and policies related to traffic and circulation, pedestrian flows, mass transit utilization and bicycle routes will be evaluated in the EIR.

**Response b: Potentially Significant Impact.** A significant impact may occur if the adopted Metropolitan Transportation Authority (MTA) thresholds for a significant project impact are exceeded. To address the increasing public concern that traffic congestion is affecting the quality of life and economic vitality of the State of California, Proposition 111 enacted the Congestion Management Program (CMP). The Proposed Project would cause traffic and vehicular trips to be directed to the roadway segments and intersections adjacent to the Project Site and in the Project Site vicinity. The impact of the Proposed Project's additional traffic on CMP intersections and freeway segments will be evaluated within the scope of the EIR.

**Response c: No Impact.** . The Project Site is not located within the vicinity of any private or public airport or planning boundary of any airport land use plan. In addition, the Project Site does not currently contain any aviation-related uses, and the Proposed Project would not include the development of any aviation-related uses. Thus, the Proposed Project would have no impact on air traffic patterns, and no further analysis of this issue is required.

**Response d: Potentially Significant Impact.** A significant impact may occur if the Proposed Project includes new roadway design or introduces a new land use or features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if Project Site access or other features are designed in such a way as to create hazardous conditions. Vehicular access to the Project Site is currently provided from Casitas Avenue. The Proposed Project would include one full-access driveway off of Casitas Avenue, which would provide direct access to the parking structure on-site. A separate loading driveway would allow delivery trucks to temporarily park in the Project Site. A designated fire lane would transverse the Project Site connecting from the northeast corner (at Casitas Avenue) to the southwest corner of the Project Site and loop back to Casitas Avenue along the southern and eastern property lines. Therefore, the EIR will analyze the Proposed Project's potential to result in traffic hazards.

**Response e: Potentially Significant Impact.** A significant impact may occur if the Project design would not provide emergency access meeting the requirements of the Los Angeles Fire Department, or in any other way

threaten the ability of emergency vehicles to access and serve the Project Site or adjacent uses. The Proposed Project may affect vehicular and pedestrian flow in the Project Site area during the construction phase, which would be temporary and only last the length of the construction period. The Proposed Project would include an emergency lane through the Project Site to meet the requirements of the LAFD. Nonetheless, the EIR will analyze the Proposed Project's potential impacts on emergency access during the Project's construction and operation phases.

**Response f: Potentially Significant Impact.** A significant impact may occur if a project could conflict with adopted policies or involve modifications to existing alternative transportation facilities located on-site or off-site. The Proposed Project would increase the utilization of the Project Site when compared to existing uses. The potential of the Proposed Project to conflict with adopted policies, plans, and programs supporting alternative transportation will be analyzed in the EIR.

## **XVII. TRIBAL CULTURAL RESOURCES.**

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

a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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**Response a: Less Than Significant Impact.** A project would cause a substantial adverse change in the significance of a tribal cultural resource with cultural value to a California Native American tribe if such resource is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or if such resource is determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. PRC 5024.1(c) states that “[a] resource may be listed as an historical resource in the California Register if it meets any of the following National Register of Historic Places criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
2. Is associated with the lives of persons important in our past.
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
4. Has yielded, or may be likely to yield, information important in prehistory or history.

As discussed in response to Checklist Question V.b (Cultural Resources, Archeological Resources) the Project Site is substantially underlain by undocumented fill material to a depth of 1 to 14 feet, which will likely need to be removed and recompacted to support shallow building foundation systems. Excavation into the native soil below documented fill material is not anticipated, except in limited areas beneath the proposed seven-story parking structure and within the footprint of the existing warehouse/production building. The Project Site does not contain any known archaeological sites or archaeological survey areas, and the results of the Cultural Resources Records Search indicate there is a low probability of encountering archaeological and/or California Native American Tribal resources during construction. In the unlikely event that archaeological resources are encountered during the construction phase, work in the area of the find shall be halted and a qualified archaeologist shall incorporate mitigation measures MM A-1 through MM A-3 that would avoid or reduce potential project-related impacts. Similarly, if any human remains are encountered unexpectedly during construction demolition and/or grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code (PRC) Section 5097.98. In the event of a potential find, a certified Native American Monitor, specialized in tribal resources, will evaluate the cultural resource. Thus, incorporation of the mitigation measures MM A-1 through MM A-3, compliance with applicable California Public Resources Code and California Health and Safety Code requirements with regards to human remains, and the potential evaluation by a certified Native American Monitor in the event of a find, would ensure that the Project would have a less than significant impact with respect to archaeological, California Native American Tribal, and/or historical resources. As such, no further analysis on this issue is required.

**Response b: Potentially Significant.** Public Resources Code Section 21084.2 establishes that “[a] project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment.” To help determine whether a project may have such an effect, the Public Resources Code requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project. Pursuant to the procedures imposed by AB 52, a request for consultation was sent via certified mail on November 15, 2016 to the following local Native American Tribal representatives who are on file with the Department of City Planning as having requested to be notified of future development projects: (1) Fernandeno Tataviam Band of Mission Indians, (2) Soboba Band of Luiseno Indians, and (3) Gabrieleño Band of Mission Indians – Kizh Nation. Copies of these letters are provided in Appendix B to this Initial Study.

In response to the AB 52 Consultation request, the City of Los Angeles Department of City Planning received one response letter from the Gabrieleño Band of Mission Indians. Citing the fact that the Project Site lies in a broad area where the Ancestral territories of the Kizh (Kitc) Gabrieleño's villages adjoined and overlapped with each other, at least during the Late Prehistoric and Protohistoric Periods, the Gabrieleño Band of Mission Indians is requesting

that one of their certified Native American Monitors be on site during any and all ground disturbances (including but not limited to pavement removal, post holing, auguring, boring, grading, excavation and trenching) to protect any cultural resources which may be affected during construction or development. No further evidence was provided to indicate the presence of any known cultural sites or resources within the Project Site or immediate Project area (as discussed under Response XVII.a, above). Formal consultation with the Gabrieleño Band of Mission Indians took place on January 24, 2017. As consultation regarding Tribal Cultural Resources is ongoing, this topic will be further analyzed in the EIR.

<b>XVIII. UTILITIES AND SERVICE SYSTEMS.</b> Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g. Comply with federal, state, and local statutes and regulations related to solid waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Response a: Potentially Significant Impact.** A significant impact would occur if a project exceeds wastewater treatment requirements of the applicable Regional Water Quality Control Board. The Los Angeles Regional Water Quality Control Board (LARWQCB) enforces wastewater treatment and discharge requirements for properties in the Project Site area. The Project is located within the Hyperion Water Reclamation Plant (HWRP) service area. Development of the Project would increase the utilization of the Project Site by increasing on-site floor area and the number of persons on-site compared to existing conditions, which could have the potential to change the wastewater flows as compared to existing conditions. The potential for the Proposed Project to exceed the wastewater treatment requirements of the LARWQCB will be analyzed in the EIR.



**Response b: Potentially Significant Impact.** A significant impact may occur if a project would increase water consumption or wastewater generation to such a degree that the capacities of facilities currently serving the Project Site would be exceeded. Water is currently supplied to the Project Site by the City of Los Angeles Department of Water and Power and, as previously mentioned, the Project Site is located within the HWRP service area. The Proposed Project's water demand and wastewater generation will be analyzed within the scope of the EIR.

**Response c: Less than Significant Impact.** A significant impact may occur if the volume of stormwater runoff increases 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. Currently, the Project Site is nearly 100 percent impervious and nearly 100 percent of on-site stormwater is directed to existing stormwater inlets around the Project Site. Stormwater would continue to flow into the City's storm drain system via catch basins on the adjacent streets. There is currently no known deficiency in the stormwater system serving the Project vicinity. Final plan check by the Bureau of Engineering would ensure that adequate capacity is available in the storm drain system in this system prior to Project approval. The Applicant would be responsible for providing the necessary storm drain infrastructure improvements to connect with the existing drainage system serving the Project Site. Moreover, the Proposed Project would be required to comply with the LID Ordinance, which requires projects to capture and treat the first ¾-inch of rainfall in accordance with established stormwater treatment priorities. As such, the Proposed Project would be expected to produce similar or reduced runoff flows as compared to existing conditions. Therefore, the Proposed Project would not exceed the existing capacity of stormwater infrastructure currently serving the Project Site area, and a less than significant impact would occur. No further analysis on this issue is required.

**Response d: Potentially Significant Impact.** A significant impact may occur if a project increases 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 potential impacts associated with the availability of water supplies to serve the Proposed Project will be analyzed in the EIR.

**Response e: Potentially Significant Impact.** 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. The potential impacts associated with the provision of wastewater treatment services to the Proposed Project will be analyzed in the EIR.

**Response f: Potentially Significant Impact.** 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. The potential impacts associated with the ability of the local landfills to serve the Proposed Project will be analyzed in the EIR.

**Response g: Potentially Significant Impact.** A significant impact may occur if a project generates solid waste that is not disposed of in accordance with applicable regulations. The Proposed Project's potential impacts associated with federal, State, and local statutes and regulations related to solid waste will be evaluated and analyzed in the EIR.

<b>XIX. MANDATORY FINDINGS OF SIGNIFICANCE.</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Does the project have impacts which are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of an individual 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).	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects, which cause substantial adverse effects on human beings, either directly or indirectly?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Response a: Potentially Significant Impact.** A significant impact may occur if a project would degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. Based on the analysis contained in this Initial Study, the Proposed Project has the potential to result in significant impacts with regard to the following subject areas: aesthetics; air quality; geology and soils; hazards and hazardous materials; hydrology and water quality; land use and planning; noise; public services; transportation/circulation; and utilities. Therefore, the Project has the potential to degrade the quality of the environment. The EIR will analyze these potentially significant impacts.

**Response b: Potentially Significant Impact.** A significant impact may occur if a project, in conjunction with other related projects in the area of the Proposed Project, would result in impacts that are less than significant when viewed separately, but would be significant when viewed together. The EIR will address cumulative impacts for each environmental issue topic included within the scope of the EIR.

**Response c: Potentially Significant Impact.** A significant impact may occur if a project has the potential to result in significant impacts, as discussed in the preceding sections. As identified in this Initial Study, the Proposed Project has the potential to result in significant impacts. Impacts for each potentially significant impact category identified in items I through XVIII, above, will be individually addressed in the EIR to analyze the potential environmental impacts of the Proposed Project.