

# CITY OF LOS ANGELES

OFFICE OF THE CITY CLERK  
200 NORTH SPRING STREET, ROOM 395  
LOS ANGELES, CALIFORNIA 90012

## CALIFORNIA ENVIRONMENTAL QUALITY ACT INITIAL STUDY AND CHECKLIST

CEQA Guidelines Section 15063

<b>LEAD CITY AGENCY</b> Los Angeles Department of City Planning	<b>ADDRESS</b> 200 N. Spring St., Los Angeles, CA 90012	<b>DATE</b> February 20, 2013
<b>CONTACT PERSON</b> Diana Kitching, City Planner	<b>TELEPHONE NUMBER</b> (213) 978-1342	
<b>RESPONSIBLE AGENCIES</b> SCAQMD, RWQCB		
<b>PROJECT LOCATION:</b> The Project Site includes several parcels on an approximate 10-acre site located in the Fashion District in downtown Los Angeles. The primary street address associated with the Project Site is 1057 South San Pedro Street, 90015. The Project Site is generally bounded by 12 <sup>th</sup> Street to the north, San Julian Street to the west, San Pedro Street to the east, and 9 <sup>th</sup> Street to the south. A complete list of properties identified by Assessor Parcel Numbers (APN's) and street addresses is provided in Attachment A to the NOP.		
<b>PROJECT TITLE/NO.</b> City Market Los Angeles	<b>CASE NO.</b> ENV-2012-3003-EIR	
<b>PREVIOUS ACTIONS CASE NO.</b>	<input type="checkbox"/> DOES have significant changes from previous actions. <input type="checkbox"/> DOES NOT have significant changes from previous actions.	

**PROJECT DESCRIPTION**

The Proposed Project ("The City Market of Los Angeles") seeks to redevelop a 10-acre project site across four blocks in Downtown Los Angeles. The Project Site currently contains approximately 59,000 sf of warehouse, wholesale, office, bank, storage, and surface parking uses. Table 1 provides a summary of the existing land uses on the Project Site. The Proposed Project seeks to demolish all 59,000 sf of existing structures on the site, and build approximately 1,690,000 sf of new floor area. Table 2 provides a summary of the proposed development.

The Proposed Project is anticipated to be built out over a 30-year period and would include the construction of approximately 945 multiple residential dwelling units, a maximum of 210 hotel rooms, approximately 294,641 square feet of commercial (including medical and general office) and manufacturing uses, approximately 224,862 square feet of retail floor area (including restaurants, bars, event space, wholesale uses, and a cinema with approximately 744 seats), and approximately 312,112 square feet of corporate/educational campus floor area. The Project would include approximately 3,670 parking spaces in above and below grade parking structures. Proposed building heights would range from three stories to 38 stories (max. 435 feet above grade).

The Proposed Project would allow for a Land Use Equivalency Program (the "Equivalency Program") to provide development flexibility for the future demands of the market and economy. The Equivalency Program would define a framework within which permitted land uses and square footages could be exchanged for other permitted land uses so long as the limitations of the Equivalency Program are satisfied and no additional significant environmental impacts occur. Under all resulting development scenarios and combinations of land uses, the total project net square footage of development would not exceed an FAR of 4.15:1 or 1,690,000 square feet.

Table 1 Summary of Existing Land Uses on the Project Site		
Location	Land Use Type	Quantity
Block 1 – Site 5 – Bldg #6	Warehouse/shipping	7,000 sf
Block 1 – Site 7 – Bldg #3	Bank Office	4,000 sf 4,000 sf
Block 1 – Site 8 – Bldg #7	Warehouse	11,000 sf
Block 2 – Site 1 – Bldg #17	Wholesale (50%) CMLA Studio	4,000 sf 4,000 sf
Block 2 – Site 1 – Bldg #18	Storage	3,000 sf
Block 2 – Site 2 – Bldg #8	Wholesale	5,000 sf
Block 2 – Site 2 – Bldg #9	Wholesale	11,000 sf
Block 2 – Site 3 – Bldg #12	Wholesale	6,000 sf
TOTAL SQFT:		59,000 sf


Existing	59,000 sqft
To Be Demolished	59,000 sqft
Proposed	1,069,000 sqft
Net New	1,010,000 sqft
Gross Total	1,069,000 sqft

**Add Area:** In response to the proposed development application, the Department of City Planning is requesting the analysis of an Add Area for a General Plan Amendment from Limited Manufacturing (“LM”) to Community Commercial (“CC”) on the adjoining lots along the west side of San Julian Street between 9<sup>th</sup> Street to the north and 12<sup>th</sup> Street to the south. These lots are identified in Figure 3, Project Site and Proposed Add Area Boundaries, attached. No physical development is proposed within the Add Area at this time. The boundaries of this add area are subject to change; The maximum possible Add Area is being analyzed in this Environmental Impact Report.

**Project Entitlements:** The Project would require the following discretionary actions: (1) Development Agreement to establish development parameters on the Site; (2) General Plan Amendment to change the land use designation from Light Manufacturing (“LM”) to Community Commercial (“CC”); (3) Zone Change from the M2-2D Zone to the C2-2 Zone; (4) Height District Change from -2D to -2 to remove the D Development limitation; (5) a Supplemental Use District (SUD) for advertising signage; (6) Floor Area Averaging in a unified commercial, residential and school development not to exceed 4.15:1 FAR; (7) a Master Conditional Use Permit (CUP) for the on-site and off-site sales of alcoholic beverages in retail establishments, bars and restaurants; (8) for Site Plan Review Findings to be made a part of the discretionary approvals; (9) an Airspace Tentative Tract Map to permit the merger and re-subdivision of the land and the creation of five ground lots containing a total of 48 air space lots necessary to facilitate the development of the project; (10) In the Airspace Tentative Tract Map, vacation of an existing alleyway and a limited airspace vacation to permit a pedestrian structure above the public right-of-way; (11) demolition, grading, excavation, and foundation permits; and (12) haul route approval.

**ENVIRONMENTAL SETTING:**

<b>COMMUNITY PLAN AREA</b> Central City Community Plan	<b>AREA PLANNING COMMISSION/CNC</b> Central City	<b>STATUS:</b> <input type="checkbox"/> PRELIMINARY <input type="checkbox"/> PROPOSED <input checked="" type="checkbox"/> ADOPTED <span style="float: right;">date 05/07/2009</span>
<b>EXISTING ZONING</b> M2-2D	<b>MAX. DENSITY ZONING</b> 3:1	<input checked="" type="checkbox"/> DOES CONFORM TO PLAN <input type="checkbox"/> DOES NOT CONFORM TO PLAN
<b>PLANNED LAND USE &amp; ZONE</b> C2 Zone, “CC” Community Commercial	<b>MAX. DENSITY PLAN</b> 3:1	
<b>SURROUNDING LAND USES</b> Industrial, Wholesale, Retail, Commercial.	<b>PROJECT DENSITY</b> Total FAR = 4.15:1	

 **DETERMINATION (To be completed by Lead Agency)**

**On the basis of this initial evaluation:**

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

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- 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.

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

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- 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 I) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2)

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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.

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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.

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SIGNATURE

Planning Assistant, EIR unit  
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:
  - 1) The significance criteria or threshold, if any, used to evaluate each question; and
  - 2) The mitigation measure identified, if any, to reduce the impact to less than significance.



**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:**

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

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

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



**BACKGROUND**

<b>PROponent NAME</b> City Market of Los Angeles, C/O Peter Fleming, President and CEO	<b>PHONE NUMBER</b> (213) 746-0646
<b>PROponent ADDRESS</b> City Market of Los Angeles 1057 San Pedro Street Los Angeles, CA 90015	
<b>AGENCY REQUIRING CHECKLIST</b> Los Angeles Department of City Planning	<b>DATE SUBMITTED</b> January 8, 2013



**ENVIRONMENTAL IMPACTS**

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

**I. AESTHETICS.** Would the project:

	Potentially Significant Impact	Potentially Significant Unless 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input 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-d:** The existing site is partially vacant and partially developed with one and two-story commercial office/wholesale retail land uses. There are no rock outcroppings on-site and the Site is not located within a state scenic highway. Buildings and structures on the Project Site which are older than 45 years of age are proposed to be demolished as part of the Proposed Project. As such, these properties will be evaluated to determine whether they meet the criteria to be considered historic resources. Additionally, the development of structures that are approximately 3 to 38 stories (max. height of 435 feet) in height has the potential to alter viewsheds and potentially create shade and shadow impacts upon the surrounding uses. Development of the Project will include the construction of high-rise buildings, structured parking areas, and a proposed signage program, all of which have the potential to introduce additional sources of light and glare. Therefore, the EIR will provide additional analysis of the Project’s aesthetic impacts upon the environment.

**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	Potentially Significant Unless 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)),	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

timberland (as defined by Public Resources Code section 4526, or timberland zoned Timberland Production (as defined by Government Code section 51104 (g)?

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

**Response a-e.** A significant impact may occur if a project were to result in the conversion of state-designated agricultural land from agricultural use to another non-agricultural use, the conversion of land zoned for agricultural use or under a Williamson Act contract from agricultural use to another non-agricultural use, results in the rezoning of forest land or timberland, or involves other changes in the existing environment which, could result in conversion of Farmland, to non-agricultural use. The Project Site is zoned for light manufacturing uses (M2-2D) and is not used for any agricultural-related uses. Therefore, the Proposed Project would have no impact associated with the conversion of agricultural uses or forested lands. 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 result in:

	Potentially Significant Impact	Potentially Significant Unless 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"/>

**Responses a-e.** A significant impact may occur if the 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. Construction of the Project has the potential to generate air quality emissions on-site during earthwork and construction related activities. The long-term operation of the Project also has the potential to generate air quality emissions, primarily in the form of motor vehicle emissions from residents, employees and visitors driving to and from the Project Site. Certain uses, such as restaurants have the potential to generate odorous emissions from kitchen exhaust fans. Accordingly, the Project's consistency with the applicable AQMP, its potential to exceed federal, State, or regional standards or thresholds or contribute to an existing or projected air quality violation, and potential to generate odors will be analyzed in greater detail in the EIR.

IV. BIOLOGICAL RESOURCES. Would the project:	Potentially Significant Impact	Potentially Significant Unless 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>

**Response a-d:** The existing Project Site is partially vacant and partially developed with one and two-story commercial office/wholesale retail land uses. The site is devoid of any natural habitat. No candidate, sensitive or special status species identified in local plans, policies or regulations, or by the California Department of Fish and Game (CDFG) or the U.S. Fish and Wildlife Service (USFWS) are expected to occur on the Site. The Project Site is within an industrially developed area of the City and there are no nearby stretches of open space or areas of significant biological resource value. As such, the Project would not have an adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act. The Project would not interfere with the movement of any native resident or migratory fish or wildlife species and no impact would occur. No further analysis of this issue is required.

**Response e.** A project-related significant adverse effect could occur if a project is inconsistent with local regulations pertaining to biological resources. Local ordinances protecting biological resources are limited to the City of Los Angeles Tree Preservation Ordinance. The Site currently has a mix of office, parking and commercial retail/wholesale uses. The Project Site does not contain any trees, shrubs or vegetation. As such no oak trees, sycamores, California Bay, Black Walnut, or other protected biological resources occur on site. Therefore, no further analysis of this issue is required.

**Response f.** No approved local, regional, or state habitat conservation plans exist for the Site. Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources, or with the provisions of an adopted Habitat Conservation Plan. No impact would occur and further analysis of this issue is not required.

V. CULTURAL RESOURCES: Would the project:	Potentially Significant Impact	Potentially Significant Unless 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Response a.** 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. Several structures are located on the Project Site that are older than 50 years of age and thus could potentially be considered historic resources. The EIR will evaluate the historic and architectural characteristics of the Project Site and the structures within the Add Area to determine the Project's potential to adversely impact any historic resources.

**Response b.** Section 15064.5 of the State CEQA Guidelines defines significant archaeological resources as resources that meet the criteria for historical resources, as discussed above, or resources that constitute unique archaeological resources. A project-related significant adverse effect could occur if the project were to affect archaeological resources which fall under either of these categories. The Project will involve excavation and earthwork for the construction of a two-level below grade parking structure. The property is not located in an area identified as potentially containing significant archeological resources; further, the property has previously been built upon, and the subsurface is likely to have been significantly disturbed. Nonetheless, new construction activities may result in the discovery of unknown archaeological resources. Environmental impacts may result from project implementation due to discovery of unrecorded archaeological resources. However, the potential impacts will be mitigated to a less than significant level by the following measures:

IS-1: If any archaeological materials are encountered during the course of project development, all further development activity shall halt and:

- The services of an archaeologist shall then be secured by contacting the South Central Coastal Information Center (657-278-5395) located at California State University 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.
- The applicant shall comply with the recommendations of the evaluating archaeologist, as contained in the survey, study or report.
- Project development activities may resume once copies of the archaeological survey, study or report are submitted to: SCCIC Department of Anthropology, McCarthy Hall 477, CSU Fullerton, 800 North State College Boulevard,

Fullerton, CA 92834.

- Prior to the issuance of any building permit, the applicant shall submit a letter to the case file indicating what, if any, archaeological reports have been submitted, or a statement indicating that no material was discovered.

- A covenant and agreement binding the applicant to this condition shall be recorded prior to issuance of a grading permit.

**Response c.** A significant adverse effect could occur if grading or excavation activities associated with the Project would disturb paleontological resources or geologic features which presently exist within the Site. The property is not located in an area identified as potentially containing significant paleontological or geologic resources; further, the property has previously been built upon, and the subsurface is likely to have been significantly disturbed. Nonetheless, new construction activities may result in the discovery of unknown paleontological or geologic resources. Environmental impacts may result from project implementation due to discovery of unrecorded paleontological resources. However, the potential impacts will be mitigated to a less than significant level by the following measures:

IS-2: If any paleontological materials are encountered during the course of project development, all further development activities shall halt and:

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

**Response d.** A significant adverse effect would occur if grading or excavation activities associated with a project were to disturb previously interred human remains. The Project will involve excavation and earthwork during the construction phases. The Site is located in an urbanized area and is not known to be associated with any cemetery uses. The property is not located within, adjacent to, or in close proximity to areas of known human burials. Further, the property has previously been built upon, and the subsurface it likely substantially disturbed. Nevertheless, new construction activities may result in the discovery of unknown/undocumented human remains. Environmental impacts may result from project implementation due to discovery of unrecorded human remains. In the event that human remains are discovered during excavation activities, the following procedure shall be observed:

IS-3:

- a. Stop immediately and contact the County Coroner: 1104 N. Mission Road, Los Angeles, CA 90033. 323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or 323-343-0714 (After Hours, Saturday, Sunday, and Holidays)
- b. The coroner has two working days to examine human remains after being notified by the responsible person. If the remains are Native American, the Coroner has 24 hours to notify the Native American Heritage Commission.
- c. The Native American Heritage Commission will immediately notify the person it believes to be the most likely descendent of the deceased Native American.
- d. The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.

e. If the descendent does not make recommendations within 48 hours the owner shall reinter the remains in an area of the property secure from further disturbance, or;

f. If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the Native American Heritage Commission.

Discuss and confer means the meaningful and timely discussion careful consideration of the views of each party.

VI. GEOLOGY AND SOILS. Would the project:	Potentially Significant Impact	Potentially Significant Unless 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response a-i:** A significant impact may occur if a project is located within a State-designated Alquist-Priolo Zone or other designated fault zone, and appropriate building practices are not employed. The Project Site is located within the seismically active southern California region and will involve the redevelopment of a 10-acre site that will increase the resident and employment population on site. Based on a preliminary review of the City's Seismic Hazards Map, the Project Site is not located on or adjacent to a designated Alquist-Priolo Special Studies Zone & Fault Rupture Study Area. (City of Los Angeles General Plan Framework Element, Environmental and Public Facilities Maps, Map No. 33). Nevertheless, the EIR will provide detailed analysis to determine the Project Site's proximity to known faults and/or other designated fault hazard zones.

**Response a.ii:** A significant impact may occur if the Project represents an increased risk to public safety or destruction of property by exposing people, property, or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with locations in the Southern California region. As with all properties in the seismically active

Southern California region, the Site is susceptible to ground shaking during a seismic event. Potential impacts from seismic ground shaking are present throughout Southern California and would be of comparable intensity at the Project Site as it would be for the entire Los Angeles region. The Project will be required to comply with existing codes, which reduce seismic risks to an acceptable level. The EIR will provide additional analysis to assess the project's potential to result in seismic impacts.

**Response a.iii:** A significant impact may occur if a project is located in an area identified as having a high risk of liquefaction and mitigation measures required within such designated areas are not incorporated into the project. The possibility of liquefaction occurring at a given site is dependent upon the occurrence of a significant earthquake in the vicinity, sufficient groundwater to cause high pore pressures, and on the grain size, relative density, and confining pressures of the soil at the Site. The EIR will provide additional analysis to assess the project's potential to result in seismic-related ground failure, including liquefaction or collapse.

**Response a.iv:** A significant adverse effect may occur if a project is located in a hillside area with soil conditions that would suggest high potential for sliding. The Project Site is topographically flat and is not located within a City designated landslide area. Therefore, landslides would not be expected to occur on the Site. No impact would occur and no further analysis of this issue is required.

**Response b:** A significant impact may occur if a project exposes large areas to the erosional effects of wind or water for a protracted period of time. The Site is currently occupied by buildings and paved parking lots. Although project development has the potential to result in erosion of soils during Site preparation and construction activities, erosion would be reduced by implementation of stringent erosion control measures imposed during grading and in accordance with building permit regulations. The potential for soil erosion during the ongoing operation of the Project is relatively low due to the generally level topography of the development area. Nevertheless, the EIR will provide additional analysis to assess the project's potential to result in soil erosion or the loss of topsoil.

**Response c:** A significant impact may occur if a project is built in an unstable area without proper Site preparation or design features to provide adequate foundations for project buildings, thus posing a hazard to life and property. Potential impacts with respect to liquefaction and landslide potential are evaluated in Questions 6(a)(iii) and (iv) above. The EIR will provide additional analysis to assess the Project's potential to result in geologic impacts, including an assessment of the depth of groundwater below the Project Site, the potential for the Project to be subject to ground failure and/or subsidence.

**Response d:** A significant impact may occur if the project is built on expansive soils without proper Site preparation or design features to provide adequate foundations for project buildings thus posing a hazard to life and property. The EIR analysis will identify the potential for soil expansion to occur and, if applicable will identify mitigation measures to reduce such impacts to acceptable levels.

**Response e:** This question would apply to the Project only if it were located in an area not served by an existing sewer system. The 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?

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact upon the environment?	<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"/>

**Responses a-b:** Construction and operation of the Project has the potential to generate greenhouse gas emissions, either directly or indirectly, which may have a significant impact on the environment. In addition, the Project will need to be evaluated for consistency with all applicable plans, policies or regulations adopted for the purpose of reducing the emissions of greenhouse gases. Thus, the Project’s generation of greenhouse gas emissions and any required mitigation measures will be analyzed in the EIR.

VIII. HAZARDS AND HAZARDOUS MATERIALS Would the project:	Potentially Significant Impact	Potentially Significant Unless 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	<input type="checkbox"/>

**Response a:** A significant impact may occur if a project involves use or disposal of hazardous materials as part of its routine operations and would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors. The Project’s construction activities will require the use of gasoline and diesel fuel, paints, solvents, and other acidic or alkaline solutions that may require special handling, transport, and disposal. During operation, residential and commercial uses would generally store and use products such as commercial cleaning and landscape application materials. Since the Project would require the transport, use, and disposal of potentially hazardous materials, the potential for an impact to occur will be analyzed within the scope of the EIR.

**Response b:** A significant impact may occur if a project utilizes quantities of hazardous materials as part of its routine

operations and could potentially pose a hazard to nearby sensitive receptors under accident or upset conditions. The Project is not anticipated to result in a release of hazardous materials into the environment. The operation of the project would utilize only limited amounts of common potentially hazardous materials such as cleaning fluids. Nonetheless, additional analysis to assess the Project's potential to result in hazardous materials impacts will be included in the scope of the EIR.

**Response c:** The Project is not within one-quarter mile of a primary or secondary school. Therefore, no impacts involving schools as it related to the accidental release of potentially hazardous materials would occur, and no further analysis is required.

**Response d:** California Government Code Section 65962.5 requires various state agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities from which there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis. The EIR will include a Phase I Environmental Assessment which will identify whether the Project or any adjacent land uses are listed as hazardous waste disposal site, or are otherwise associated with any accidental releases of hazardous materials.

**Responses e & f:** The Hawthorne Airport and the Los Angeles International Airport (LAX) are located approximately 9 and 10 miles to the southwest of the Project Site, respectively. The Project is not located near a private airstrip. No impacts involving airports would occur, and no further analysis is required.

**Response g:** A significant impact may occur if a project were to interfere with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan or would generate traffic congestion that would interfere with the execution of such a plan. The Project will involve new driveways and curb cuts to access the on site parking garages. Off-site roadway improvements may also be required as a form of mitigation to reduce the Project's impacts upon the local roadways. As such, any impacts to emergency response plans will be further analyzed in an EIR.

**Response h:** A significant impact may occur if a project is located in proximity to wildland areas and poses a potential fire hazard, which could affect persons or structures in the area in the event of a fire. The Site is not located in Mountain Fire District or Fire Buffer Zone. As such, the project's potential to expose people or structures to a significant risk of loss, injury or death involving wildland fires would be less than significant.

IX. HYDROLOGY AND WATER QUALITY. Would the proposal result in:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 an manner which would result in flooding on- or off site?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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?
- f. Otherwise substantially degrade water quality?
- 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?
- h. Place within a 100-year flood plain structures which would impede or redirect flood flows?
- i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?
- j. Inundation by seiche, tsunami, or mudflow?

**Response a:** 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 storm water drainage systems. Development of the Project has the potential to alter the existing surface water runoff drainage pattern and rainfall absorption, causing a net increase in rates of storm water discharge. The project's potential to violate any water quality standards or waste discharge requirements will be further analyzed in an EIR.

**Response b:** A significant impact may occur if a project includes deep excavations resulting in the potential to interfere with groundwater movement or included withdrawal of groundwater or paving of existing permeable surfaces important to groundwater recharge. The Project does not propose any permanent groundwater wells or pumping activities to supply water. All water supplied to the Site will be derived from the City's existing water supply and infrastructure maintained by the Department of Water and Power (DWP). Nevertheless, the EIR will provide additional analysis to assess the Project's potential to result in hydrology and water quality impacts, including the need for temporary dewatering during construction.

**Response c:** A significant impact may occur if a project results in a substantial alteration of drainage patterns that would result in a substantial increase in erosion or siltation during construction or operation of the project. There are no natural watercourses on the Project Site. Grading and construction activities may temporarily alter the existing drainage patterns of the Project Site, which could result in erosion and siltation. The EIR will assess the project's potential to result in hydrology and water quality impacts, including analysis of increases in siltation, the adequacy of the proposed drainage plan, and the use of best management practices (BMPs) during construction.

**Response d:** A significant impact may occur if a project results in increased runoff volumes during construction or operation that would result in flooding conditions affecting the Project Site or nearby properties. Grading and construction activities on the Project Site may temporarily alter the existing drainage patterns and the direction and flow of surface water runoff. The EIR will provide additional analysis to assess the project's potential to result in hydrology and water quality impacts, including the changes in on-site drainage patterns, any changes in runoff volumes resulting from the development of the project, and the available capacity of the storm drain system.

**Response e:** Construction of the Project could contribute to the degradation of existing surface water quality conditions primarily due to: 1) potential erosion and sedimentation during the grading phase, 2) particulate matter from dirt and dust generated on the Site, and 3) construction activities and equipment. The EIR will assess the project's potential to result in hydrology and water quality impacts, including the adequacy of the proposed drainage plan, BMPs, as well as existing water quality regulations and standards and any required mitigation measures.

**Response f:** As previously discussed, the Project may involve the use of contaminants that could potentially degrade water

quality if not properly handled and stored. Therefore, the EIR will provide additional analysis to assess the project’s potential to result in hydrology and water quality impacts.

**Response g-h:** The Project Site is not located within an area identified by Federal Emergency Management Agency (FEMA) as potentially subject to 100-year floods nor is it located within a City-designated 100-year or 500-year flood plain.<sup>1</sup> The Project Site is located in an area of minimal flooding and would not introduce people or structures to an area of high flood risk. Therefore, the Project would not contain any significant risks of flooding and would not have the potential to impede or redirect floodwater flows. No impact would occur and no further analysis of this issue is required.

**Response i:** A significant impact may occur if the Project exposes people or structures to a significant risk of loss or death caused by the failure of a levee or dam, including but not limited to a seismically-induced seiche. Based on the lack of such large enclosed water bodies nearby, the Proposed Project would not expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam.

**Response j:** The Project Site is not located in a Tsunami Hazard Area, and it is located at least 10 miles from the Pacific Ocean and is not near any other major water bodies; therefore, risks associated with seiches or tsunamis would be considered extremely low at the Project Site. Furthermore, the Project Site is located within a developed industrial zone within the Fashion District in downtown Los Angeles where little open space exists. Therefore, the potential for mudflows to impact the project Site is highly unlikely. The Project would have no impact with regard to seiches, tsunamis, or mudflows, and no further analysis of this issue is required.

X. LAND USE AND PLANNING. Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Physically divide an established community?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input 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 type="checkbox"/>	<input checked="" type="checkbox"/>

**Response a:** A significant impact may occur if a project were 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 which would divide a community and impede access between parts of the community). The Proposed Project is located on several developed parcels within the Fashion District of the City of Los Angeles. The Proposed Project will include a zone change and General Plan Amendment to change the existing zoning and land use designation of Light Industrial (M2-2D) to Community Commercial (C2). As requested by the City, the EIR will analyze the Project’s requested zone change and GPA in conjunction with a larger Add Area, as defined in the NOP. Thus, this issue will be analyzed in further detail in the EIR.

**Response b:** A significant impact may occur if a project is inconsistent with the General Plan, the Urban Design guidelines, or zoning designations currently applicable to the project Site and would cause adverse environmental effects, which the General Plan and zoning ordinance are designed to avoid or mitigate. The Proposed Project has the potential to conflict with the current zoning of the project Sites. Currently, the project Site is designated for Light Manufacturing land uses and is zoned M2-2D. The Proposed Project includes a zone change and General Plan Amendment to change the existing zoning and land

<sup>1</sup> Federal Emergency Management Agency, 2008, website: <https://hazards.fema.gov/femaportal/wps/portal/>, accessed December 2012.

use designation of Light Industrial (M2-2D) to Community Commercial (C2). Accordingly, the EIR will provide additional analysis to assess the Project’s consistency with applicable General Plan policies, zoning code restrictions, Southern California Association of Governments (SCAG) policies, any other applicable City or County plans, and any required mitigation measures.

**Response c:** As discussed in Question IV(f) above, no habitat conservation plans or natural community conservation plans presently exist which govern any portion of the project Site. The project Site is located in an area that has been previously disturbed and graded. Therefore, the Project would not have the potential to conflict with any applicable habitat conservation plan or natural community conservation plan. No impact would occur and no further analysis of this issue is required.

XI. MINERAL RESOURCES. Would the project:	Potentially Significant Impact	Potentially Significant Unless 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>

**Response a-b:** The Project is not located near any oil fields and no oil extraction activities have historically occurred on or are presently conducted at the project Site. Furthermore, the project Site is not in an area identified by the City of Los Angeles as containing a significant mineral deposits site that would be of value to the region and the residents of the state.<sup>2</sup> Therefore, no locally designated resources would be impacted by development of the project. No impact would occur and no further analysis of this issue is required.

XII. NOISE. Would the project:	Potentially Significant Impact	Potentially Significant Unless 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"/>

<sup>2</sup> City of Los Angeles Department of City Planning, *Environmental and Public Facilities Maps: Areas Containing Significant Mineral Deposits in the City of Los Angeles, September 1996.*

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

**Response a:** Construction of the Proposed Project would require the use of construction equipment during grading, hauling, establishing building foundations, installation of utility lines and services, and other construction activities. The potential exists for construction noise to be generated in excess of 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:** A significant impact would occur if the Project exposed 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 room surfaces is called groundborne noise. The ground motion caused by vibration is measured as particle velocity in inches per second and in the U.S. 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 Project’s potential to impact surrounding uses during construction.

**Response c-d:** A significant impact may occur if the Proposed Project were to result in a substantial temporary or permanent increase in ambient noise levels in the project vicinity. Construction, as well as traffic and human activity associated with the Proposed Project, 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:** A significant impact may occur if the Proposed Project were 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 nearest airport to the project Site is the Los Angeles International (LAX) Airport, which is located approximately 10 miles to the west of the Project Site. Therefore, no impact would occur and no further analysis of this issue is required.

**Response f:** A significant impact may occur if the Project 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	Potentially Significant Unless 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:** A significant impact may occur if a project were to locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing population growth that would otherwise not have occurred as rapidly or in as great a magnitude. The Proposed Project would provide for approximately 945 multi-family housing residential units. The potential of the Proposed Project to directly and indirectly induce substantial population growth will be analyzed in the EIR.

**Response b:** A significant impact may occur if a project would result in displacement of existing housing, necessitating

construction of replacement housing elsewhere. However, the project site is currently zoned for and developed with M2 Light Manufacturing land uses and no housing would be displaced. Thus, the Project would not displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere. Therefore, no impact would occur and no further analysis is required.

**Response c:** A significant impact may occur if a project would result in the displacement of substantial numbers of people, necessitating the construction of replacement housing elsewhere. The proposed demolition would not involve the displacement of any residential uses, as none are currently developed on Site. Therefore, no impact would occur and no further analysis 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	Potentially Significant Unless 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response a:**

**Fire Protection:** A significant impact may occur if the City of Los Angeles Fire Department (LAFD) could not adequately serve the Project based upon response time, access, or fire hydrant/water availability. The potential impact of the Project on fire protection services will be analyzed in the EIR.

**Police Protection:** A significant impact may occur if the City of Los Angeles Police Department (LAPD) could not adequately serve the Project, necessitating a new or physically altered station. If existing service capacities are exceeded, new facilities, equipment and/or personnel may be required to maintain acceptable response times and service levels. The potential impact of the Project on police protection services will be analyzed in the EIR.

**Schools:** A significant impact may occur if a project includes substantial employment or population growth, which could generate a demand for school facilities that would exceed the capacity of the Los Angeles Unified School District (LAUSD). The Project would directly impact local schools by providing new housing. Thus, the potential for the Proposed Project to impact school facilities and services will be analyzed in the EIR.

**Parks:** A significant impact would occur if the available City of Los Angeles Department of Recreation and Parks (LADRP) recreation and park services could not accommodate a project, necessitating new or physically altered facilities, the construction of which could cause significant environmental impacts. The Project includes the development of residential uses that will increase the permanent residential population occupying the Project Site. The EIR will evaluate the Project’s on-site open space and recreational amenities and will determine the Project’s impact upon public park facilities.

**Libraries:** A significant impact would occur if the Project would 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, the construction of which could cause significant environmental impacts. Within the City of Los Angeles, the Los

Angeles Public Library (LAPL) System provides services at the Central Library, 8 Regional Branch Libraries and 64 Community Branch Libraries. There are three LAPL library facilities within a 2-mile radius of the Project Site. These facilities include the Central Library (530,000 sf) located at 630 W. Fifth Street; the Little Tokyo Branch Library (12,500 sf) located at 203 South Los Angeles Street, and the Chinatown Branch Library (14,500 sf) at 639 N. Hill Street. The Project is anticipated to increase the resident population in the Project Area, and would likely increase demands upon existing library facilities. However, it is not anticipated that the Project will necessitate the new construction or physical remodeling of any of the library facilities serving the Project Site. The Revised Branch Facilities Plan, a component of the LAPL 2007-2010 Strategic Plan, consists of two components: (1) Criteria for New Libraries that set standards for the size and features of branches based on location and the population served in each community, and (2) a List of Projects, identifying the facility status and need of each existing branch library and identifying the need for branch libraries in communities without existing libraries. The Branch Facilities Plan identifies a total of 19 projects to build expand or remodel facilities throughout the City of Los Angeles, one of which includes developing a new branch facility in Southeast Los Angeles. The targeted acquisition area for this facility is approximately 1 to 1.25 miles to the south of the Project Site (south of the 10 Freeway). This planned library, once constructed would further serve to accommodate the project area's demands upon LAPL services. The Proposed Project's impacts on LAPL services would therefore be less than significant and no further analysis of this issue is warranted.

**XV. RECREATION.**

- a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?
- b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

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

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

**Response b:** Development of the project has the potential to increase demands upon recreational facilities that may require the construction of new facilities or expansion of recreation facilities. The Project would include on site open space and amenities to meet the needs of the residents and visitors of the Project. Therefore, the potential for the construction of such facilities to have an adverse effect on the environment will be analyzed in the EIR.

**XVI. TRANSPORTATION/CIRCULATION.** Would the project:

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

Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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- b. Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?
- c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?
- d. Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
- e. Result in inadequate emergency access?
- f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

**Response a:** A significant impact may occur if the project were to 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. The Project will include the development of 1,690,000 square feet of new development including residential, hotel, office, retail, cinema, restaurant, and wholesale uses, and, as such, will have the potential to generate increased vehicle trips, pedestrian flows and increased demand for mass transit within the project area. The potential of the Project to cause a substantial increase in traffic in relation to existing traffic loads and capacity will be analyzed in the EIR. The Project’s consistency with applicable plans and policies related to traffic, pedestrian flows, mass transit utilization and bicycle routes will also be evaluated.

**Response b:** A significant impact may occur if adopted Metropolitan Transportation Authority (MTA) thresholds for a significant project impact would be exceeded. To address the increasing public concern that traffic congestion is affecting the quality of life and economic vitality of the State of California, the Congestion Management Program (CMP) was enacted by Proposition 111. The 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 vicinity. The impact of this additional traffic will be evaluated within the scope of the EIR.

**Response c:** The Project does not contain any aviation-related uses, and the Project would not include the development of any aviation-related uses. Thus, the Project would have no impact on air traffic patterns, and no further analysis of this issue is required.

**Response d:** The Project would include the construction of new ingress and egress driveways from the surrounding streets to access the proposed parking structures. The EIR will provide additional analysis to assess the project’s potential to result in traffic hazards.

**Response e:** A significant impact may occur if a project design does not provide emergency access meeting the requirements of the City of Los Angeles Fire Department or in any other way threatens the ability of emergency vehicles to access and serve the project Site or adjacent uses. The increased traffic and population on the Project Site could obstruct emergency vehicle access to the project Sites and adjacent uses in the project vicinity. The EIR will provide additional analysis to assess the project’s potential to result in traffic impacts, and any required mitigation measures.

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

XVII. UTILITIES. Would the project:	Potentially Significant Impact	Potentially Significant Unless 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Have sufficient water supplies available to serve the project from existing entitlements and resource, 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:** 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 area. The Project is located within the Hyperion Treatment Plant (HTP) service area. The potential of the Project to exceed the wastewater treatment requirements of the LARWQCB will be analyzed in the EIR.

**Response b:** A significant impact may occur if a project would increase water consumption or wastewater generation to such a degree that 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 DWP and as previously mentioned, the Project Site is located within the HTP service area. The potential of the Project to result in the construction of new water or wastewater treatment facilities will be analyzed in the EIR.

**Response c:** A significant impact may occur if the volume of storm water 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. The potential of the Project to result in the construction of new or expansion of existing stormwater facilities will be analyzed in the EIR.

**Response d:** A significant impact may occur if a project were to increase water consumption to such a degree that new water sources would need to be identified, or that existing resources would be consumed at a pace greater than planned for by purveyors, distributors, and service providers. The potential impacts associated with the availability of water supplies to serve the Project will be analyzed in the EIR.

**Response e:** A significant impact may occur if a project would increase wastewater generation to such a degree that the capacity of facilities currently serving the project Site would be exceeded. The potential impacts associated with the provision

of wastewater treatment services to the Project will be analyzed in the EIR.

**Response f:** A significant impact may occur if a project were to increase solid waste generation to a degree such that the existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. The potential impacts associated with the ability of the local landfills to serve the Project will be analyzed in the EIR.

**Response g:** A significant impact may occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. The Project’s potential impacts associated with federal, State, and local statutes and regulations related to solid waste will be analyzed in the EIR.

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE.	Potentially Significant Impact	Potentially Significant Unless 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 checked="" type="checkbox"/>	<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 checked="" type="checkbox"/>	<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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Response a:** 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. The project Site is located in an urban setting and is currently developed with light manufacturing and office land uses. The Project site is devoid of any natural vegetation and does not provide any suitable habitat to support riparian habitat or sensitive species. Thus, the Project’s potential to 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 is less than significant. Nevertheless, because the project has the potential to degrade the quality of the environment in other areas such as air quality and water quality which could indirectly affect animal and plant life, such impacts will be evaluated in the scope of the EIR.

**Response b:** A significant impact may occur if a project, in conjunction with other related projects in the area of the 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 potentially significant impact category as identified in items I through XVII, above.

**Response c:** 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 Project has the potential to result in significant impacts. Impacts for each potentially significant impact category identified in items I through XVII above, will be individually addressed in the EIR.

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

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

PREPARED BY	TITLE	TELEPHONE #	DATE
Diana Kitching	City Planner	(213) 978-1342	February 20, 2013

