CITY OF LOS ANGELES
DEPARTMENT OF CITY PLANNING
CITY HALL 200 NORTH SPRING STREET LOS ANGELES CA 90012

Mitigated Negative Declaration

655 Mesquit Street Project

Case Number: ENV-2020-6829-EAF
CPC-2020-6828-GPA-ZC-HD-SPR-MCUP

Project Location: 635 – 657 South Mesquit Street, 632 – 648 South Santa Fe Avenue, and 1585 East Jesse Street, Los Angeles, CA 90021

Community Plan Area: Central City North

Council District: 14

Project Description: 655 Mesquit, LLC (the "Applicant") proposes to redevelop a surface parking lot on the existing 640 S. Santa Fe Avenue site ("Project Site") into a 14-story commercial building with approximately 188,954 square feet of floor area comprised of 184,629 square feet of office uses and approximately 4,325 square feet of ground floor commercial uses ("Project"). The proposed development activities would be limited to the eastern portion of the Project Site fronting Mesquit Street (referred to as the "Development Site" in this IS/MND). The Project Site occupies approximately 68,893 square feet of lot area (1.58 acres) after dedications and is located on the northern side of Jesse Street, between Mesquit Street and Santa Fe Avenue in the Arts District in the City of Los Angeles ("City"). The western half of the Project Site that fronts Santa Fe Avenue is developed with the recently constructed 640 S. Santa Fe Avenue building, which is a four-story, 107,224 square-foot office and ground floor commercial building with two levels of subterranean parking. The Development Site is currently developed as a surface parking lot to serve the 640 S. Santa Fe Avenue building.

The Project would include two levels of subterranean parking and five levels of above grade parking on a portion of the Project Site that is currently improved with a surface parking lot. The height of the new structure would be 195 feet above grade. Vehicular access to the parking would be provided by a two-way driveway shared with the 640 S. Santa Fe Avenue building, running along the northern property line from Santa Fe Avenue through to Mesquit Street. From the driveway, on the interior of the Project Site, access to the two subterranean parking levels would be provided by a ramp shared with the 640 S. Santa Fe Avenue building, and access to the five levels of above grade parking would be provided via an interior ramp within the Project building footprint. The top level of the above-grade parking level is proposed to function as a flexible community space when not in use for parking. Typical events envisioned for the space include farmers markets and community meetings. In total, the Project would provide 397 vehicle parking spaces, 343 of which satisfy code required parking for the Project and 54 of which would serve the 640 S. Santa Fe Avenue Project as replacements for the parking displaced from the existing surface parking lot. Loading space and some handicap accessible parking spaces would be provided at grade. The Project's proposed floor area of 188,954 square feet combined with the 107,224 square feet of floor area from the 640 S. Santa Fe Avenue building would create a total proposed floor area of 296,178 square feet for the entire Project Site, resulting in a Floor Area Ratio of 4.3:1.

PREPARED FOR:	**PREPARED BY:**	**APPLICANT:**
The City of Los Angeles Department of City Planning	Parker Environmental Consultants, LLC	655 Mesquit, LLC

September 2021

INITIAL STUDY CHECKLIST
MITIGATED NEGATIVE DECLARATION

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INITIAL STUDY/
MITIGATED NEGATIVE DECLARATION (IS/MND)

Section 1. Introduction

Project Information

Project Title: 655 Mesquit Street Project
Project Location: 635 – 657 S. Mesquit Street, 632 – 648 S. Santa Fe Avenue, and 1585 E. Jesse Street, Los Angeles, CA 90021

Project Applicant: 655 Mesquit, LLC
Mark Falcone, C/O Roger Pecsok
1881 16th Street, Suite 500
Denver, CO 80202

Lead Agency: City of Los Angeles
Department of City Planning
200 N. Spring Street, Room 763
Los Angeles, CA 90012

An application for the proposed 655 Mesquit Street Project ("Project") has been submitted to the City of Los Angeles Department of City Planning for discretionary review. The City of Los Angeles ("City"), as Lead Agency, has determined that the Project is subject to the California Environmental Quality Act ("CEQA"), and the preparation of an Initial Study ("IS") is required.

This Initial Study/Mitigated Negative Declaration ("IS/MND") analyzes and discloses the potential environmental effects that may result from construction, implementation, and operation of the Project. This Initial Study has been prepared in accordance with CEQA (Public Resources Code §21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006). Based on the analysis provided within this IS/MND, the City has concluded that the Project will not result in significant impacts on the environment with the incorporation of mitigation measures identified herein. This IS/MND is intended as an informational document and is ultimately required to be adopted by the lead agency prior to Project approval.

1.1 Purpose of an Initial Study

The California Environmental Quality Act was enacted in 1970 with several basic purposes: (1) to inform governmental decision makers and the public about the potential significant environmental effects of proposed projects; (2) to identify ways that environmental damage can be avoided or significantly reduced; (3) to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternatives or mitigation measures; and (4) to

disclose to the public the reasons behind a project's approval even if significant environmental effects are anticipated.

An IS is a preliminary analysis conducted by the Lead Agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the IS concludes that the Project, with mitigation, may have a significant effect on the environment, an Environmental Impact Report should be prepared; otherwise the Lead Agency may adopt a Negative Declaration or a Mitigated Negative Declaration.

1.2 Organization of the Initial Study

This IS/MND is organized into six sections as follows:

Section 1. Introduction: This Section provides introductory information such as the Project title, the Project Applicant, and the lead agency for the Project.

Section 2. Executive Summary: This Section provides Project information, identifies key areas of environmental concern, and includes a determination whether the Project may have a significant effect on the environment.

Section 3. Project Description: This Section provides a description of the environmental setting and the Project, including project characteristics, related project information and a list of requested discretionary actions.

Section 4. Environmental Checklist: This Section contains the completed Initial Study Checklist and discussion of the environmental factors that would be potentially affected by the Project.

Section 5. Preparers and Persons Consulted: This Section provides a list of consultant team members and governmental agencies that participated in the preparation of the IS.

Section 6. References, Acronyms, and Abbreviations: This Section includes various documents and information used and referenced during the preparation of the IS, along with a list of commonly used acronyms.

1.3 CEQA Process

In compliance with the State CEQA Guidelines, the City, as the Lead Agency for the Project, will provide opportunities for the public to participate in the environmental review process. As described below, throughout the CEQA process, an effort will be made to inform, contact, and solicit input on the Project from various government agencies and the general public, including stakeholders and other interested parties.

1.3.1 Initial Study

At the onset of the environmental review process, the City has prepared this IS to identify the preliminary environmental impacts of the Project. The IS for the Project determined that the Project would not have significant environmental impacts with the incorporation of mitigation measures identified herein.

If this IS/MND is adopted and the Project is approved by the City, then within five days of the action, the City will file a Notice of Determination with the County Clerk. The Notice of Determination is posted by the County Clerk within 24 hours of receipt. This begins a 30-day statute of limitations on legal challenges to the approval under CEQA. The ability to challenge the approval in court may be limited to those persons who objected to the approval of the Project, and to issues that were presented to the lead agency by any person, either orally or in writing, during the public comment period.

INITIAL STUDY/
MITIGATED NEGATIVE DECLARATION

Section 2. Executive Summary

Project Title:	655 Mesquit Street Project
Environmental Case Number:	ENV-2020-6829-EAF
Related Cases:	CPC-2020-6828-GPA-ZC-HD-SPR-MCUP; VTT-83288
Project Location:	635 – 657 South Mesquit Street, 632 – 648 South Santa Fe Avenue, and 1585 East Jesse Street Los Angeles, CA 90021
Community Plan Area:	Central City North
Council District:	14 – Kevin de León
Lead City Agency:	City of Los Angeles Department of City Planning
Staff Contact Name and Address:	Stephanie Escobar 200 N. Main Street, Room 763 Los Angeles CA 90012
Phone Number:	(213) 978-1382
Applicant Name and Address:	655 Mesquit, LLC Mark Falcone, C/O Roger Pecsok 1881 16th Street, Suite 500 Denver, CO 80202
Phone Number:	(720) 946-4649
General Plan Designation:	Heavy Manufacturing
Zoning:	M3-1-RIO

PROJECT DESCRIPTION: 655 Mesquit, LLC (the "Applicant") proposes to redevelop a surface parking lot on the existing 640 S. Santa Fe Avenue site ("Project Site") into a 14-story commercial building with approximately 188,954 square feet of floor area comprised of 184,629 square feet of office uses and approximately 4,325 square feet of ground floor commercial uses ("Project"). The proposed development activities would be limited to the eastern portion of the Project Site fronting Mesquit Street (referred to as the "Development Site" in this IS/MND). The Project Site occupies approximately 68,893 square feet of lot area (1.58 acres) after dedications and is located on the northern side of Jesse Street, between Mesquit Street and Santa Fe Avenue in the Arts District in the City of Los Angeles ("City"). The western half of the Project Site that fronts Santa Fe Avenue is developed with the recently constructed 640 S. Santa Fe Avenue building, which is a four-story, 107,224 square-foot office and ground floor commercial building with two levels of subterranean parking. The eastern portion of the Project Site

fronting Mesquit Street is currently developed as a surface parking lot to serve the 640 S. Santa Fe Avenue building.

The Project would include two levels of subterranean parking and five levels of above grade parking on a portion of the Project Site that is currently improved with a surface parking lot. The height of the new structure would be 195 feet above grade. Vehicular access to the parking would be provided by a two-way driveway shared with the 640 S. Santa Fe Avenue building, running along the northern property line from Santa Fe Avenue through to Mesquit Street. From the driveway, on the interior of the site, access to the two subterranean parking levels would be provided by a ramp shared with the 640 S. Santa Fe Avenue building, and access to the five levels of above grade parking would be provided via an interior ramp within the Project building footprint. The top level of the above-grade parking level is proposed to function as a flexible community space when not in use for parking. Typical events envisioned for the space include farmers markets and community meetings. In total, the Project would provide 397 vehicle parking spaces, 343 of which satisfy code required parking for the Project and 54 of which would serve the 640 S. Santa Fe Avenue building as replacement spaces for the parking displaced on the surface parking lot. Loading space and some handicap accessible parking spaces would be provided at grade. The Project's proposed floor area of 188,954 square feet combined with the 107,224 square feet of floor area from the 640 S. Santa Fe Avenue building would create a total proposed floor area of 296,178 square feet for the entire Project Site, resulting in a Floor Area Ratio of 4.3:1.

ENVIRONMENTAL SETTING: The Project Site is identified as Assessor Parcel Number (APN No. 5164-015-022) and encompasses 68,893 square feet of lot area (1.58 acres) after right-of-way dedications. The Project Site is generally bounded by the Los Angeles Department of Water and Power (LADWP) River Switching Station to the north ("LADWP substation"), Mesquit Street to the east, Jesse Street to the south, and Santa Fe Avenue to the west. The western half of the Project Site is occupied by the 640 S. Santa Fe Avenue building, a four-story office and ground floor commercial building with two levels of subterranean parking that fronts Santa Fe Avenue. The proposed Development Site, which is located on the eastern portion of the Project Site fronting Mesquit Street, is currently developed as a surface parking lot to serve the 640 S. Santa Fe Avenue building. The properties surrounding the Project Site are developed with offices, industrial uses, warehousing and storage, and to the east are the Burlington Northern Santa Fe Railway trackage, and the Los Angeles River. (For additional details, see Section 3. Project Description).

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

Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

No. The City mailed tribal consultation request letters to eleven tribal representatives on file with the City on April 15, 2021. No responses for consultation were received (see Appendix N).

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code (P.R.C.) Section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per P.R.C. Section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that P.R.C. Section 21082.3(c) contains provisions specific to confidentiality.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

DETERMINATION (to be completed by Lead Agency)

On the basis of this initial evaluation:

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

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

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

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

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

Stephanie Escobar	Planning Assistant
PRINTED NAME	**TITLE**
Stephanie Escobar	09/17/2021
SIGNATURE	**DATE**

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 that significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

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

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

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

    b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

    c) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated

7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.

9) The explanation of each issue should identify:

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

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

INITIAL STUDY/
MITIGATED NEGATIVE DECLARATION

Section 3. Project Description

A. Project Summary

655 Mesquit, LLC (the "Applicant") proposes to redevelop a surface parking lot on the existing 640 S. Santa Fe Avenue site ("Project Site") into a 14-story use commercial building with approximately 188,954 square feet of floor area comprised of 184,629 square feet of office uses and approximately 4,325 square feet of ground floor commercial uses ("Project"). The Project is a commercial development located at 635 – 657 Mesquit Street, 632 – 648 S. Santa Fe Avenue, and 1585 Jesse Street, in the Arts District neighborhood, in the Central City North Community Plan in the City of Los Angeles. The proposed development activities would be limited to the eastern portion of the Project Site fronting Mesquit Street (referred to as the "Development Site"). The Project Site occupies approximately 68,893 square feet of lot area (1.58 acres) after dedications and is located on the northern side of Jesse Street, between Mesquit Street and Santa Fe Avenue in the Arts District in the City of Los Angeles ("City"). The western half of the Project Site that fronts Santa Fe Avenue is developed with the 640 S. Santa Fe Avenue building, which is a four-story, 107,224 square-foot mixed-use office and ground floor commercial building with two levels of subterranean parking. The eastern portion of the Project Site fronting Mesquit Street is currently developed as a surface parking lot to serve the 640 S. Santa Fe Avenue building (proposed "Development Site").

The Central City North Community Plan designates the Project Site for Heavy Manufacturing land uses. The Project Site is zoned M3-1-RIO. The Project Site is in a Tier 2 of the Transit Oriented Community Guidelines (TOC) and is located within the River Implementation Overlay District (RIO).

The Project proposes to redevelop a surface parking lot into a 14-story commercial building with approximately 188,954 square feet of floor area comprised of 184,629 square feet of office uses and approximately 4,325 square feet of ground floor commercial uses. The Project would include two levels of subterranean parking and five levels of above grade parking on a portion of the Project Site that is currently improved with a surface parking lot. The height of the new structure would be 195 feet above grade. Vehicular access to the parking structure would be provided by a two-way driveway shared with the 640 S. Santa Fe Avenue building, running along the northern property line from Santa Fe Avenue through to Mesquit Street. From the driveway, on the interior of the site, access to the two subterranean parking levels would be provided by a ramp shared with the 640 S. Santa Fe Avenue building, and access to the five levels of above grade parking would be provided via an interior ramp within the Project building footprint. The top level of the above-grade parking level is proposed to function as a flexible community space when not in use for parking. Typical events envisioned for the space include farmers markets and community meetings. In total, the Project would provide 397 vehicle parking spaces, 343 of which satisfy code required parking for the Project and 54 of which would serve the 640 S. Santa Fe Avenue building as replacement spaces for the parking displaced on the surface parking lot. Loading

space and some handicap accessible parking spaces would be provided at grade. The Project's proposed floor area of 188,954 square feet combined with the 107,224 square feet of floor area from the 640 S. Santa Fe Avenue building would create a total proposed floor area of 296,178 square feet for the entire Project Site, resulting in a Floor Area Ratio of 4.3:1.

B. Environmental Setting

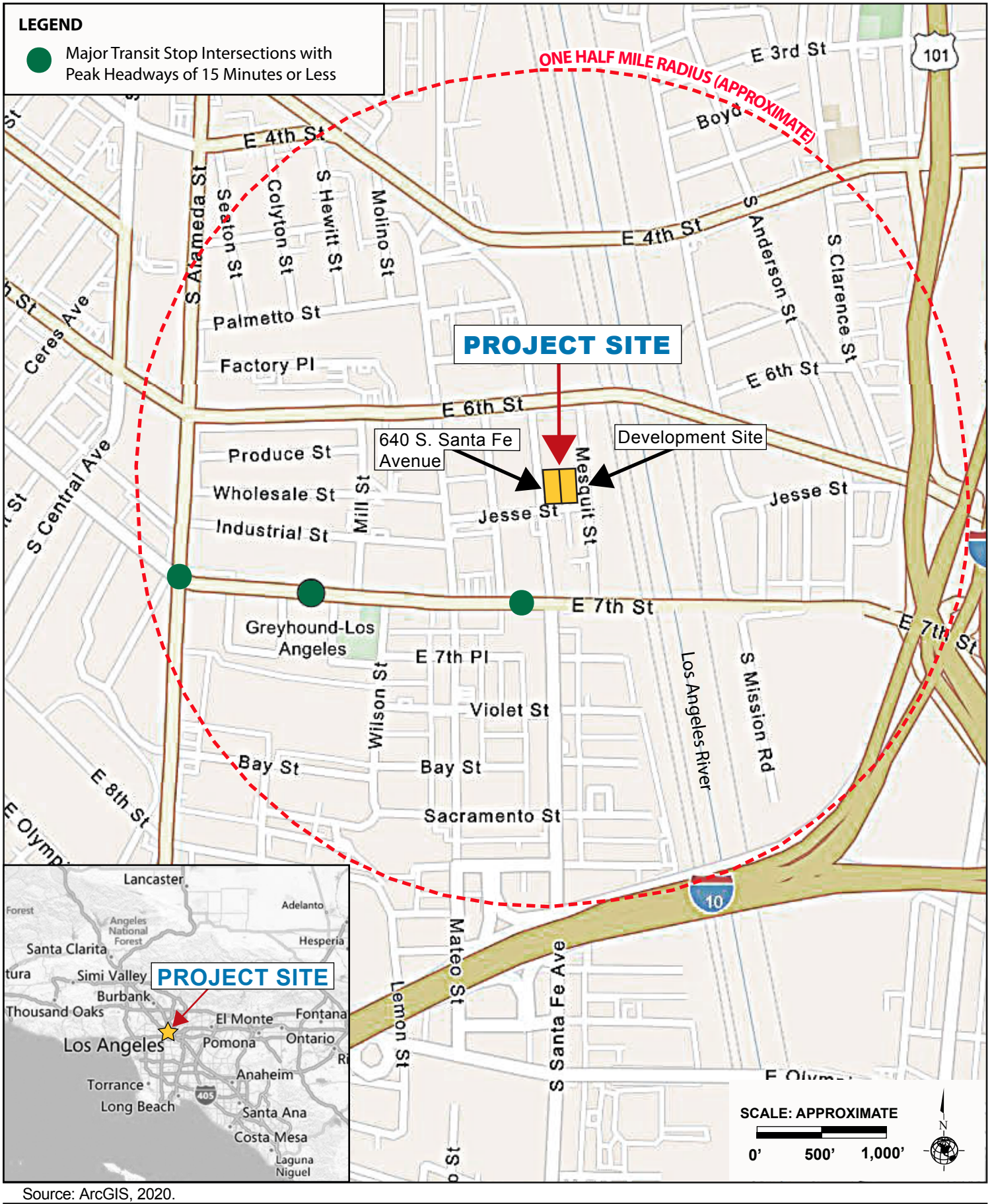
1. Project Location

The Project Site is located in the Central City North Community Plan area within the City of Los Angeles. The Project Site's location within the City of Los Angeles and the greater Los Angeles region is depicted in Figure 3.1, Project Location Map. The Project Site encompasses 22 parcels and includes approximately 71,483 square feet of gross lot area (1.64 acres) and 68,893 square feet of buildable lot area (1.58 acres) after all right-of-way dedications. The Project Site's property addresses, Assessor's Parcel Numbers ("APN"), land use, and lot area are summarized in Table 3.1, Summary of the Project Site, below.

Table 3.1
Summary of the Project Site

Address	APN	Existing Land Use	Lot Area (square feet)
635 S. Mesquit Street 643 S. Mesquit Street	5164-015-022	Eastern Half: Surface parking lot for 640 S. Santa Fe Avenue building Western Half: 640 S. Santa Fe Avenue building	68,893 sf
647 S. Mesquit Street			
640 S. Mesquit Street 651 S. Mesquit Street 638 S. Mesquit Street 638 S. Santa Fe Avenue 648 S. Santa Fe Avenue			
636 S. Santa Fe Avenue			
632 S. Santa Fe Avenue			
17 small parcels with no given address			

Sources: City of Los Angeles Department of City Planning, Zone Information and Map Access System, website: http://zimas.lacity.org/, accessed January 2021.



Source: ArcGIS, 2020.

Figure 3.1
Project Location Map

The Project Site is generally bound by the LADWP River Switching Station to the north ("LADWP substation"), Mesquit Street to the east, Jesse Street to the south, and Santa Fe Avenue to the west. Primary regional access to the Project Site is provided by the Hollywood Freeway (US-101) approximately 0.43 mile east of the Project Site, the Santa Monica Freeway (I-10) approximately 0.48 mile to the east and 0.52 mile south of the Project Site as it curves southward, the Interstate 5 Freeway (I-5) approximately 0.53 mile east of the Project Site, and the East Los Angeles Interchange, which is a freeway junction that includes the I-5, I-10, US 101, and SR-60, located approximately 0.54 mile southeast of the Project Site.

Local street access is provided by the grid roadway system surrounding the Project Site. Mesquit Street, which borders the Project Site to the east, is a two-way street providing one travel lane in each direction and street parking. Mesquit Street is classified as a Collector Street in the City's Mobility Plan. Jesse Street, which borders the Project Site to the south, is a two-way street providing one travel lane in each direction and loading zones. Jesse Street is classified as a Collector Street in the City's Mobility Plan. Santa Fe Avenue, which borders the Project Site to the west, is a two-way street providing one travel lane in each direction and street parking on the western side of the street. Santa Fe Avenue is classified as an Avenue II in the City's Mobility Plan. Other major arterial roadways providing access to the Project Site include 6th Street (the portion closest to the Project Site currently under construction for the new 6th Street bridge), located approximately 400 feet north of the Project Site, and 7th Street, located approximately 940 feet south of the Project Site.

Bus service in the Project vicinity is operated primarily by the Los Angeles County Metropolitan Transportation Authority ("Metro"). Specifically, a total of five Metro bus lines serve the nearby Project Site area, including Metro Local lines 18, 60, 62; and Metro Rapid Lines 720 and 760. The Los Angeles Department of Transportation ("LADOT") provides the DASH Downtown A bus line that also serves the nearby Project Site area. These bus lines have stops located within convenient walking distance of the Project Site along 6th Street, 7th Street, Santa Fe Avenue, and other nearby streets with some lines with headways of 15 minutes or less (see Figure 3.1, Project Location Map, above).[1] The regional bus service, Greyhound Lines, Inc., serves the nearby Project Area and has a station located 0.35 mile southwest of the Project Site.

Metro has proposed new Metro B Line (Red) and/or D Line (Purple) station near 6th Street that would provide regional and local transit connections to and from Arts District, Boyle Heights, Little Tokyo and surrounding communities. The station would be located south of LA Metro's Division 20 Rail Yard and would be generally bounded by the 6th Street Bridge to the north, 7th Street to the south, the Los Angeles River to the east, and by Mesquit Street to the west. Additionally, in order to accommodate increased service levels on the B and D Lines, Metro is moving forward with two facility improvements: a new turnback facility in the Division 20 railyard just north of 4th Street and a widening of the heavy rail tunnel south of the US-101 Freeway. The Project is located within one-half mile of the approved Division 20 railyard extension to the B and D Line.[2] There is currently no project timeline for this extension. The Project Site is located east of Downtown Los

[1] *The closest bus stops located at 7th Street and Santa Fe Avenue and 7th Street and Mateo Street are approximately 800 feet and 1,000 feet walking distance from the Project Site, respectively.*

[2] *Los Angeles County Metro, Project Tracker website, https://www.metro.net/interactives/datatables/project/, accessed August 2021.*

Angeles. Therefore, the Project Site is easily accessible and highly connected within the City and the greater Los Angeles area.

2. Existing Conditions

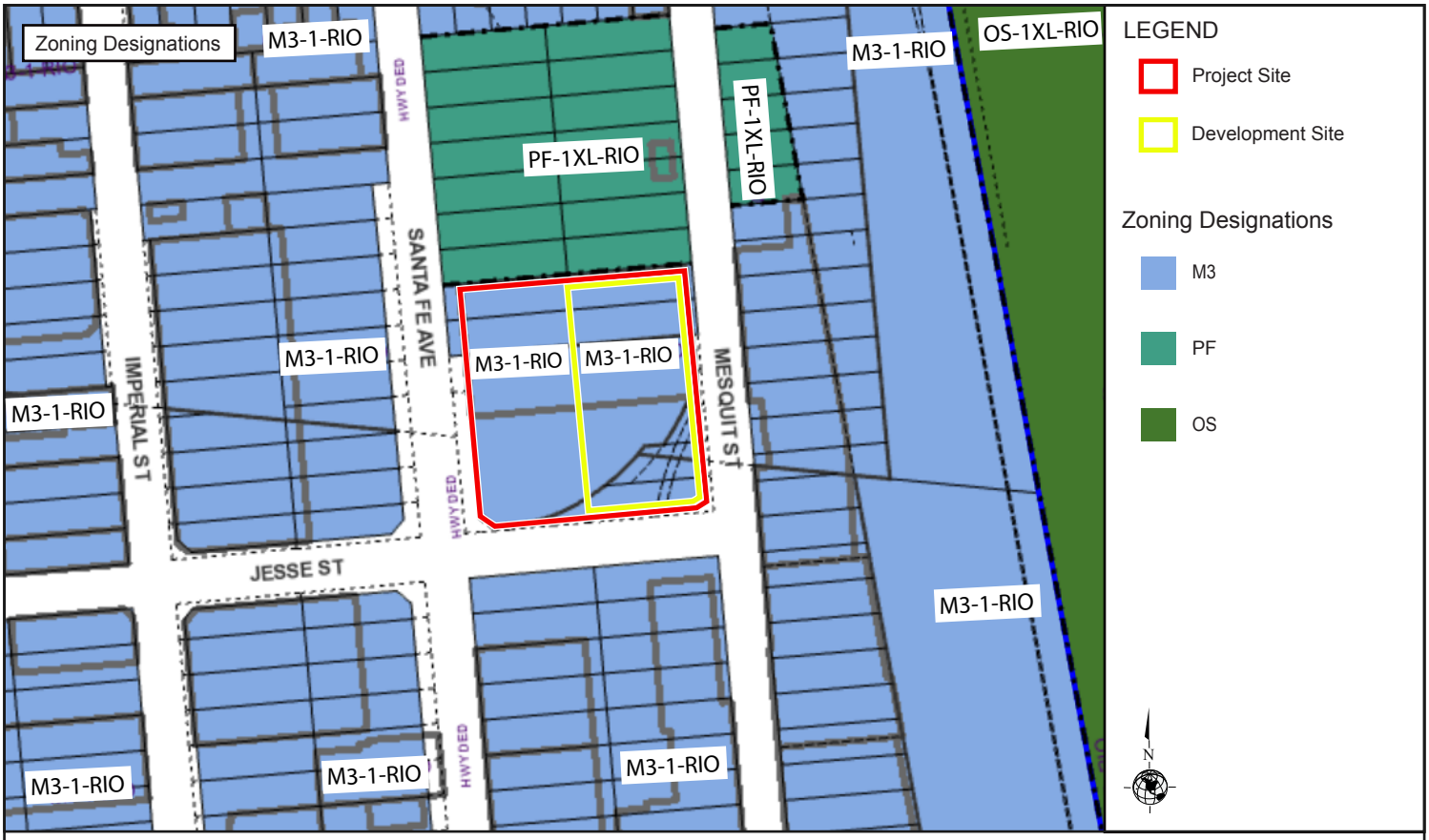
2.1 Zoning and Land Use Designations

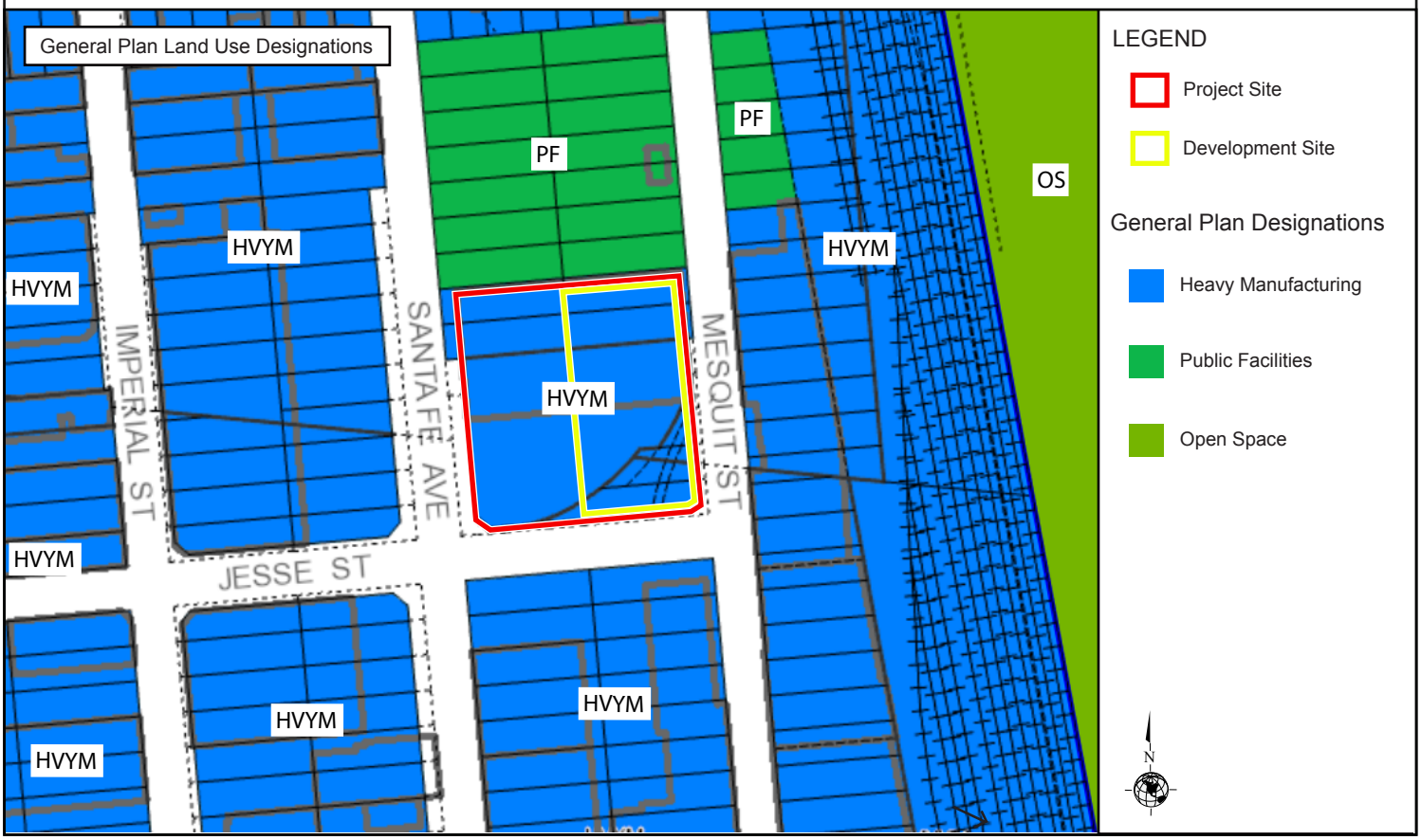
Figure 3.2, Zoning and General Plan Land Use Designations, shows the existing and proposed zoning and land use designations on the Project Site and in the surrounding area. The current zoning designation for the Project Site is M3-1-RIO (Heavy Industrial Zone) with a General Plan land use designation of Heavy Manufacturing. The zones corresponding to the Heavy Manufacturing designation include the M3 zone. The Project Site is located in Height District No. 1, which does not specify a height restriction for the M3 Zone but does limit development to a 1.5:1 FAR. The "RIO" designation identifies the Project Site as being within the River Improvement Overlay District (ZI-2358). The Project Site is also located within the East Los Angeles State Enterprise Zone (ZI-2129).

2.1.1 Central City North Community Plan

The Project Site is located within the Central City North Community Plan area ("Community Plan Area" or "CPA"). The Community Plan area contains 2,005 acres, which is approximately less than one percent of the land within the City. The plan area is adjacent to downtown Los Angeles and bound by the Los Angeles River to the east, the City of Vernon to the south, Alameda Street, Cesar Chavez Avenue, Sunset Boulevard, and Marview Avenue to the west, and Stadium Way, Lilac Terrace, and North Broadway to the north. The Community Plan Area is largely characterized by industrial uses. Commercial and residential uses comprise the northern portion of the Community Plan Area. The CPA encompasses Chinatown, parts of Little Tokyo, and parts of the original Mexican pueblo. The area is comprised of seven subareas, including Figueroa Terrace, Alpine Hill, Chinatown, North Industrial, Government Support, Artists-in-Residence District, and South Industrial.

Within the Community Plan Area, the Project Site is located within the South Industrial subarea. Industrial uses, largely characterized by large warehouses and truck and railroad yards, dominate the South Industrial subarea. Additionally, the northern end of the Alameda Corridor terminates in this area. The Alameda Corridor is an extensive 20-mile transit and commercial corridor along Alameda Street and the Southern Pacific right-of-way that extends from the ports of Long Beach and Los Angeles to Downtown Los Angeles.





Source: ZIMAS, City of Los Angeles, Department of City Planning, 2020; Parker Environmental Consultants, 2020.

Figure 3.2
Zoning and General Plan Land Use Designations

The last update of the Central City North Community Plan was the AB283 Plan Consistency program completed in 1988. Since that time, new issues have emerged, and new community objectives regarding the management of new development and community preservation have evolved. The Community Plan was developed in the context of promoting a vision of the Central City North area as a community that:

- Preserves and enhances the positive characteristics of existing residential neighborhoods while providing a variety of housing opportunities with compatible new housing.
- Improves the function, design, and economic vitality of the commercial corridors.
- Preserves and enhances the positive characteristics of existing uses, which provide the foundation for community identity, such as scale, height, bulk, setbacks, and appearance.
- Maximizes the development opportunities of future transit systems while minimizing any adverse impacts.
- Plans the remaining commercial and industrial development opportunity sites for needed job producing uses that will improve the economic and physical condition of the CPA.

The City of Los Angeles Department of City Planning is currently updating the Central City and Central City North Community Plans with the DTLA 2040 Plan. The DTLA 2040 Plan includes the implementation of the New Zoning Code regulations applicable within the Downtown Plan Area and will provide a collective vision for Downtown's future and include policies, plans, and implementation programs that frame the City's long-term priorities for downtown Los Angeles. The Draft EIR for the DTLA 2040 Plan was published in August 2020. Adoption of the DTLA 2040 Plan is anticipated to occur in late 2021.

2.1.2 River Improvement Overlay District (ZI-2358)

Effectuated by Ordinance Nos. 183,144 and 183,145 in 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 development regulations and design guidelines. The purpose of the RIO District is to support the goals of the Los Angeles River Revitalization Master Plan ("LARRMP").

The Project is located approximately 375 feet from the Los Angeles River within the outer core of the RIO District. The Project would conform to all applicable development regulations for projects in the outer core detailed by the RIO District, as codified in the LAMC in Section 13.17.

The LA River Master Plan 2020

Los Angeles County is currently updating the LA River Master Plan, a comprehensive approach covering all 51 miles of the LA River. The effort was launched to update the original 1996 Master Plan, synthesizing more recent ideas for portions of the River and bringing a comprehensive vision to the transformation of the LA River. As part of this effort, the County of Los Angeles published the Draft LA River Master Plan in January 2021. The Program Environmental Impact

Report (PEIR) for the Draft LA River Master Plan is currently undergoing public review process. Adoption of the Final Program EIR and LA River Master Plan is anticipated to occur in 2021. Although the Draft LA River Master Plan is not yet adopted, the Project's compliance with the applicable plans, policies and guidelines of the Draft LA River Master Plan is addressed where applicable in the land use and planning discussion of the IS/MND.

2.1.3 East Los Angeles State Enterprise Zone (ZI-2129)

Enterprise Zones ("EZs") are specific geographic areas that are designed by City County resolution and have received approval from the California Department of Commerce, with the goal to "provide economic incentives to stimulate local investment and employment through tax and regulation relief and improvement of public services." Parking Standards, described in Section 12.21A4(x)(3) of the LAMC, state that projects within EZs may utilize a lower parking ratio (two (2) parking spaces for every one thousand (1,000) square feet of combined gross floor area) for certain land uses, including retail and other related uses, in order to increase the buildable areas of a parcel in older areas of the City where parcels are small.

2.1.4 Transit Priority Area (ZI No. 2452)

In 2013, the State of California enacted Senate Bill 743 (SB 743), which provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." Public Resources Code Section 21099 defines a "transit priority area" as an area within one-half mile of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." Public Resources Code Section 21064.3 defines "Major Transit Stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." Public Resources Code Section 21061.3 defines an "Infill Site" as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses.

The Project Site is an infill site within a Transit Priority Area as defined by Senate Bill 743 (SB 743).[3] The bus service in the vicinity is operated primarily by the Los Angeles County Metropolitan Transportation Authority (Metro) and City Department of Transportation (LADOT). Specifically, as discussed above, there are five Metro bus lines nearby the Project Site area, including Metro Local lines 18, 60, 62; and Metro Rapid Lines 720 and 760. The DASH Downtown A bus line also serves the Project Site area. These bus lines have stops located within convenient walking distance (i.e., 800 - 1,000 feet) of the Project Site along 6th Street, 7th Street, Santa Fe Avenue,

[3] *City of Los Angeles, Department of City Planning, City of Los Angeles Zoning Information and Map Access System (ZIMAS), Parcel Profile Report, website: www.zimas.lacity.org, accessed March 2021.*

and other nearby streets with some lines with headways of 15 minutes or less (see Figure 3.1, Project Location Map, above).

2.2 Existing Site Conditions

Figure 3.3, Aerial Photograph of the Project Site and Surrounding Land Uses, shows an aerial view of the Project Site and identifies the photograph locations for the Project Site and surrounding land use photographs shown in Figure 3.4, Photographs of the Project Site - Views 1-6, and Figure 3.5, Photographs of the Surrounding Land Uses - Views 7-12. The western half of the Project Site is improved with the 640 S. Santa Fe Avenue building, a four-story, 107,224 square foot, office with ground floor commercial uses with two levels of subterranean parking. The proposed Development Site, which occupies the eastern half of the Project Site, is currently a surface parking lot for the 640 S. Santa Fe Avenue building. The 640 S. Santa Fe Avenue Project in accordance with the approved landscape palate for DIR-2016-3858-SPR, includes approximately 20 trees within the planters in the surface parking lot on the Development Site.

3. Surrounding Land Uses

As shown in Figure 3.2, above, the Project Site is in an industrially zoned “M3” area, and properties immediately bordering the Project Site and the surrounding area are zoned M3-1-RIO with Heavy Manufacturing General Plan land use designations. Immediate surrounding land uses range from one to two stories in height, and land uses in the vicinity range from one to seven stories in height. The adjacent properties to the east, west, and south are zoned M3 with a General Plan land use designation of Heavy Manufacturing consistent with the Project Site. While the majority of the properties in the surrounding area have these zoning and land use designations, the property adjacent to the north of the Project Site, the LADWP substation, is zoned PF with a land use designation of Public Facilities. The Los Angeles River, approximately 375 feet east of the Project Site, is zoned OS with a land use designation of Open Space. Photographs of the land uses immediately surrounding the Project Site are provided in Figure 3.5. Figure 3.3 shows an aerial photograph with the location of all the photographs taken of the Project Site and the surrounding land uses. Below is a description of the existing conditions in the surrounding area.

North: The Project Site is adjacent to the LADWP substation to the north. This property is zoned PF-1XL-RIO with a Public Facilities General Plan land use designation. Refer to Figure 3.5, View 7.

East: The Project Site is adjacent to Mesquit Street to the east. Across Mesquit Street, further east, is a warehouse for Integrated Food Service, which manufactures food products for schools and their distributors. This property is zoned M3-1-RIO with a Heavy Manufacturing General Plan land use designation. Also, directly east, across Mesquit Street, are loading zones and cold storage warehouse buildings. Refer to Figure 3.5, View 12. Further east, the Burlington Northern Santa Fe (“BNSF”) Railway, which is zoned M3-1-RIO with a Heavy Manufacturing land use designation, is located approximately 200 feet east of the Project Site. The Los Angeles River, which is zoned OS-1XL-RIO with an Open Space General Plan

land use designation, is located approximately 375 feet east of the Project Site. Additionally, the Union Pacific Railway, which is zoned OS-1XL-RIO with an Open Space General Plan land use designation, is located approximately 660 feet east of the Project Site.

South: Jesse Street is adjacent to the Project Site to the south. Across Jesse Street to the south are commercial office buildings. These properties are zoned M3-1-RIO with a Heavy Manufacturing General Plan land use designation. Refer to Figure 3.5, Views 9 and 11.

West: Santa Fe Avenue is adjacent to the Project Site to the west. Directly west, across Santa Fe Avenue, is a commercial office building. This property is also zoned M3-1-RIO with a Heavy Manufacturing General Plan land use designation. Refer to Figure 3.5, View 8.

Source: Google Earth, Aerial View, 2018.

Figure 3.3
Aerial Photograph of the Project Site and Surrounding Land Uses

View 1: On the western side of Santa Fe Avenue, looking southeast at the Project Site.

View 2: On the eastern side of Mesquit Street, looking northwest at the Project Site.

View 3: On the eastern side of Mesquit Street, looking west at the Project Site.

View 4: On the northwestern corner of Mesquit Street and Jesse Street, looking northwest at the Project Site.

View 5: On the southern side of Jesse Street, looking northwest at the Project Site.

View 6: On the southeastern corner of Santa Fe Avenue and Jesse Street, looking northeast at the Project Site.

Source: Parker Environmental Consultants, April 27, 2021.

Figure 3.4
Photographs of the Project Site
Views 1-6

View 7: On the western side of Santa Fe Avenue, looking northeast at properties north of the Project Site.

View 8: On the northeastern corner of Santa Fe Avenue and Jesse Street, looking northwest at properties west of the Project Site.

View 9: On the northwestern corner of Santa Fe Avenue and Jesse Street, looking southeast at properties south of the Project Site.

View 10: On the northeastern corner of Santa Fe Avenue and Jesse Street, looking southwest at properties south-west of the Project Site.

View 11: On the eastern side of Mesquit Street, looking southwest and properties south of the Project Site.

View 12: On the western side of Mesquit Street, looking northeast at properties east of the Project Site.

Source: Parker Environmental Consultants, November 3, 2020

Figure 3.5
Photographs of the Surrounding Land Uses
Views 7-12

C. Description of Project

1. Project Overview

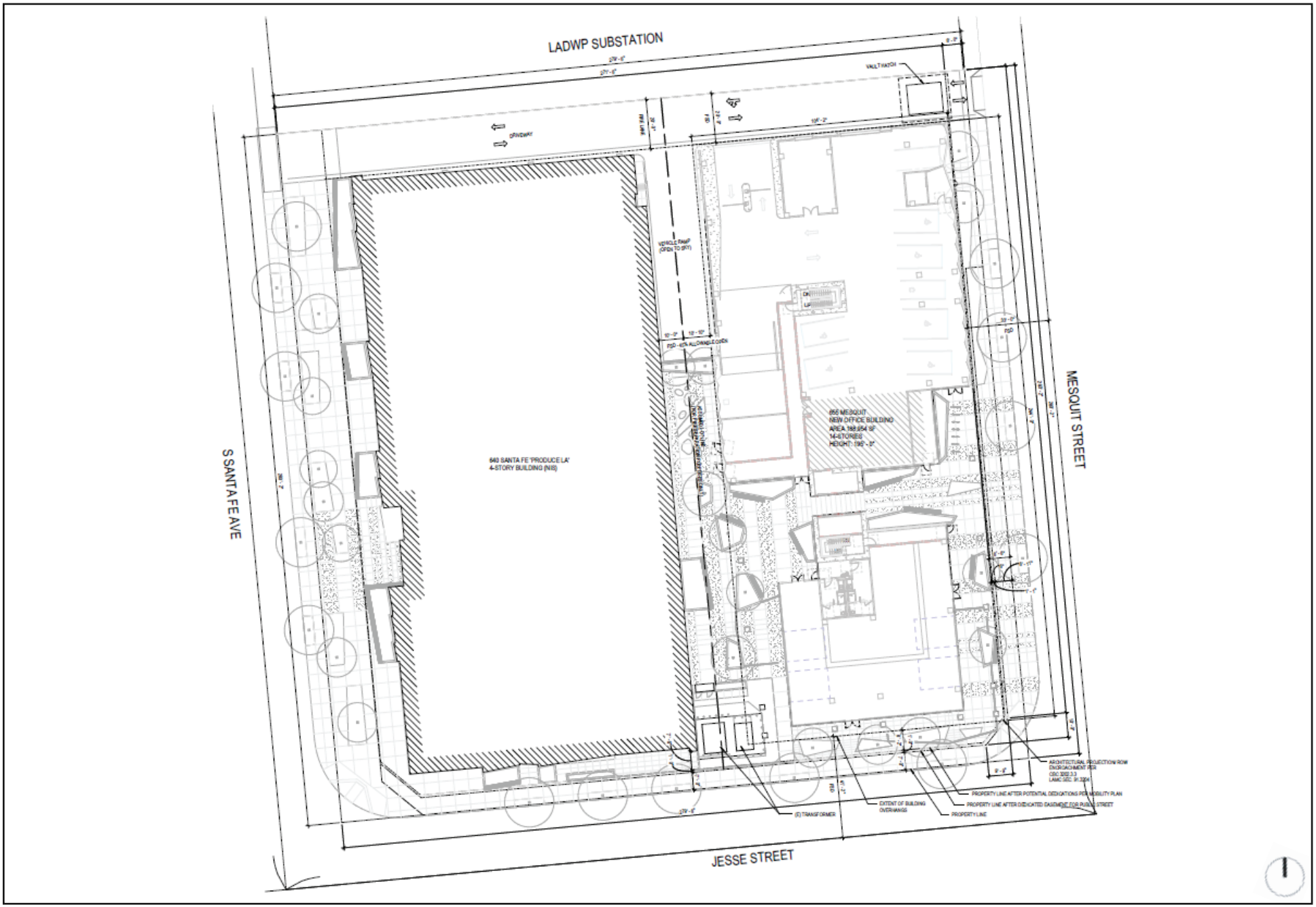
The Project proposes to redevelop a surface parking lot that is located on the eastern portion of the Project Site. The parking lot currently serves the 640 S. Santa Fe Avenue building, an existing 107,224 square foot office, retail and restaurant building, located on the western portion of the Project Site. The Project does not propose to physically alter the existing 640 S. Santa Fe Avenue building. The Project proposes a 14-story commercial building with a total of approximately 188,954 square feet of floor area comprised of 184,629 square feet of office uses and 4,325 square feet of ground floor commercial space. The proposed Development Site, which is located within the eastern half of the Project Site fronting Mesquit Street, is currently a surface parking lot for the 640 S. Santa Fe Avenue building. The buildable lot area of the Project Site is approximately 68,893 square feet after all right-of-way dedications are applied. The Project, which would create 188,954 square feet of new development, when combined with the existing 107,224 square feet of floor area from the 640 S. Santa Fe Avenue building, would result in a total proposed floor area of 296,178 square feet for the entire Project Site, resulting in a total Floor Area Ratio ("FAR") of 4.3:1.

A summary of the Project is provided in Table 3.2, Proposed Development Program, below. The plan layout of the Project is depicted in Figure 3.6, Site Plan. The floor plans are illustrated in Figures 3.7 through 3.13.

Table 3.2
Proposed Development Program

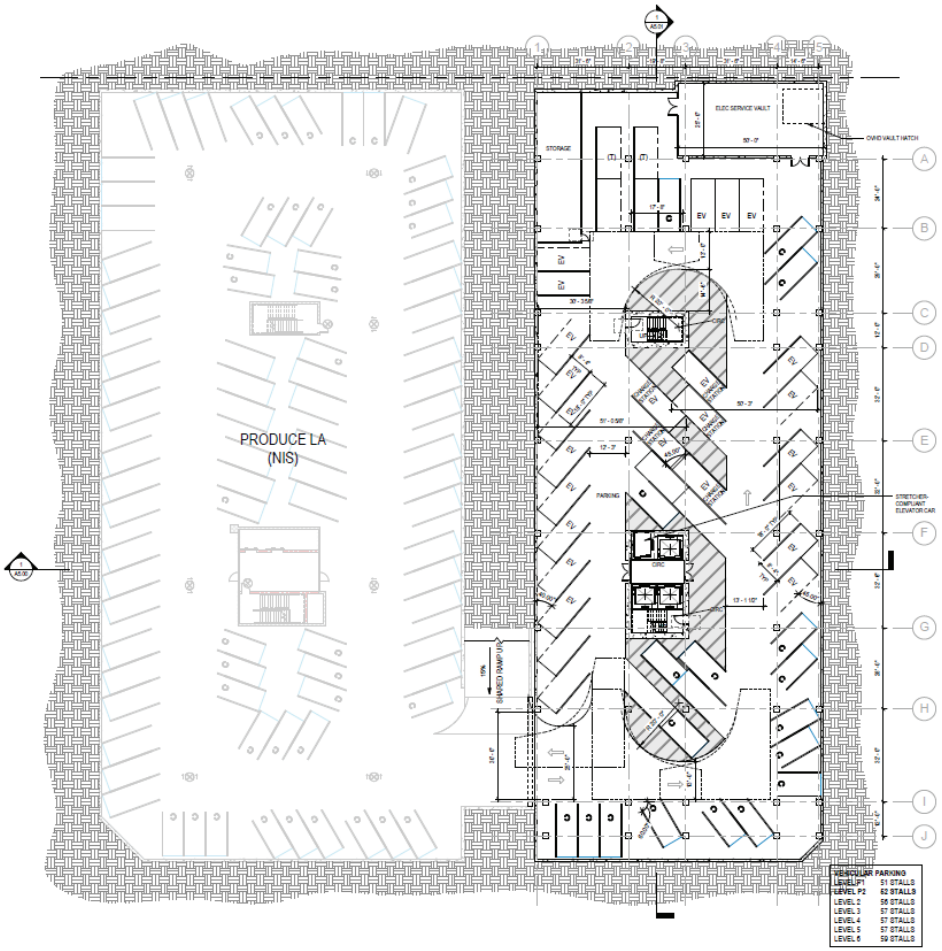
Land Uses	Floor Area
Development Site (eastern half of Project Site)	
Office	184,629 sf
Retail/Restaurant	4,325 sf
Subtotal:	**188,954 sf**
640 S. Santa Fe Avenue [a] (western half of Project Site - existing uses to remain)	
Office	91,235 sf
Retail	9,435 sf
Restaurant	6,554 sf
Subtotal:	**107,224 sf**
Project Site Floor Area TOTAL:	**296,178 sf (4.3:1 FAR)**

Notes: sf = square feet
[a] The 640 S. Santa Fe Avenue building, which occupies the western portion of the Project Site was previously entitled under Case No. DIR-2016-3858-SPR (dated May 29, 2019).
Source: Project information from Ehrlich, Yanai, Rhee, Chaney Architects, October 29, 2020.

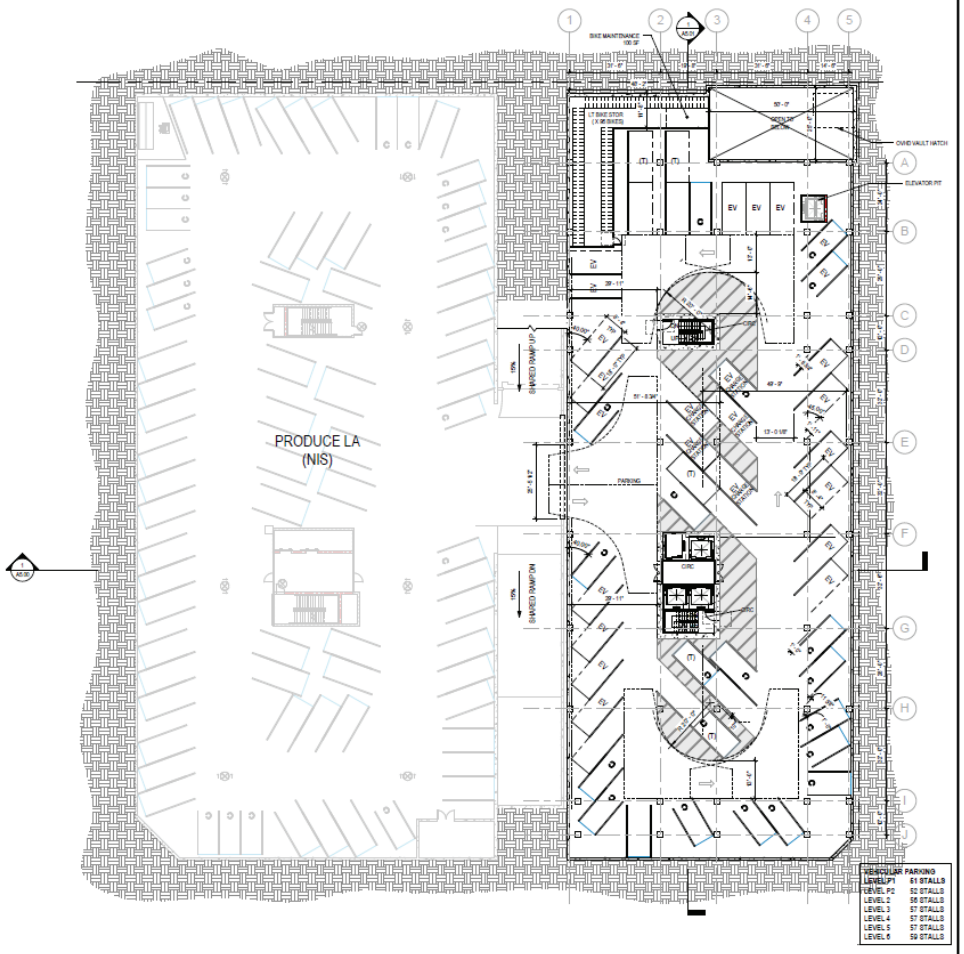


Source: Ehrlich Yanai Rhee Chaney Architects, October 29, 2020.

Figure 3.6
Site Plan



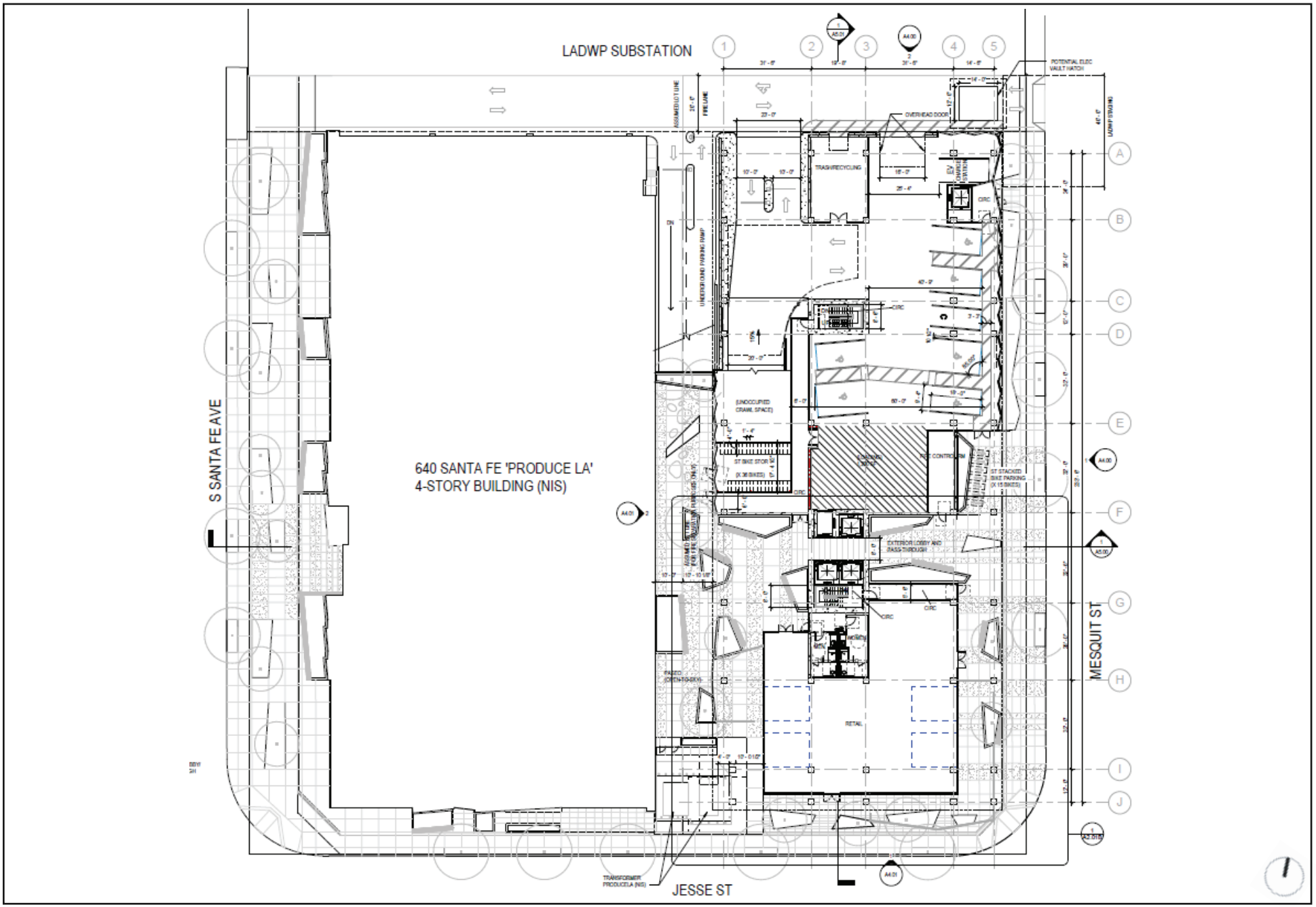
Level P2 Floor Plan



Level P1 Floor Plan

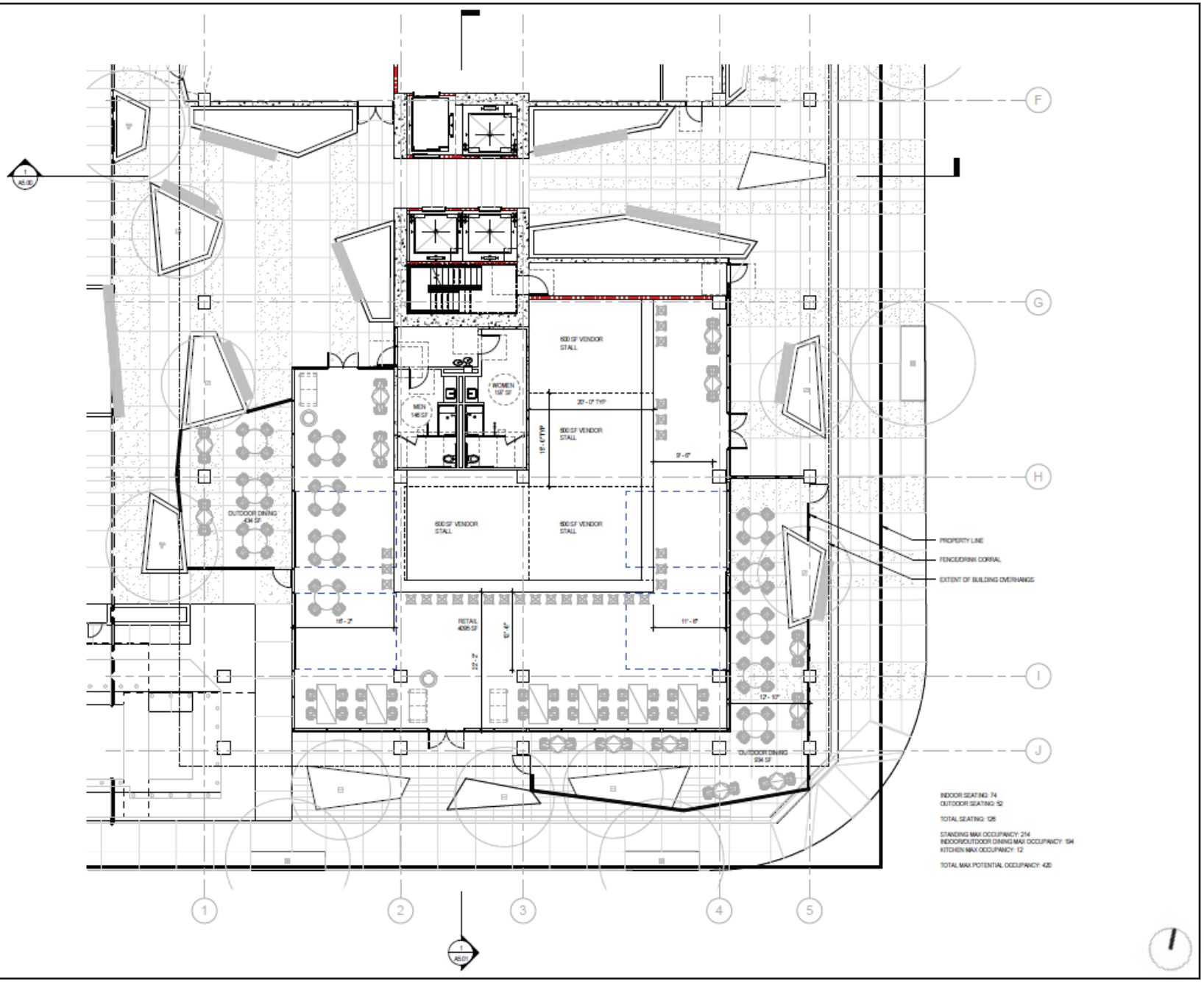
Source: Ehrlich Yanai Rhee Chaney Architects, October 29, 2020.

Figure 3.7
Level P1 and P2 Floor Plans



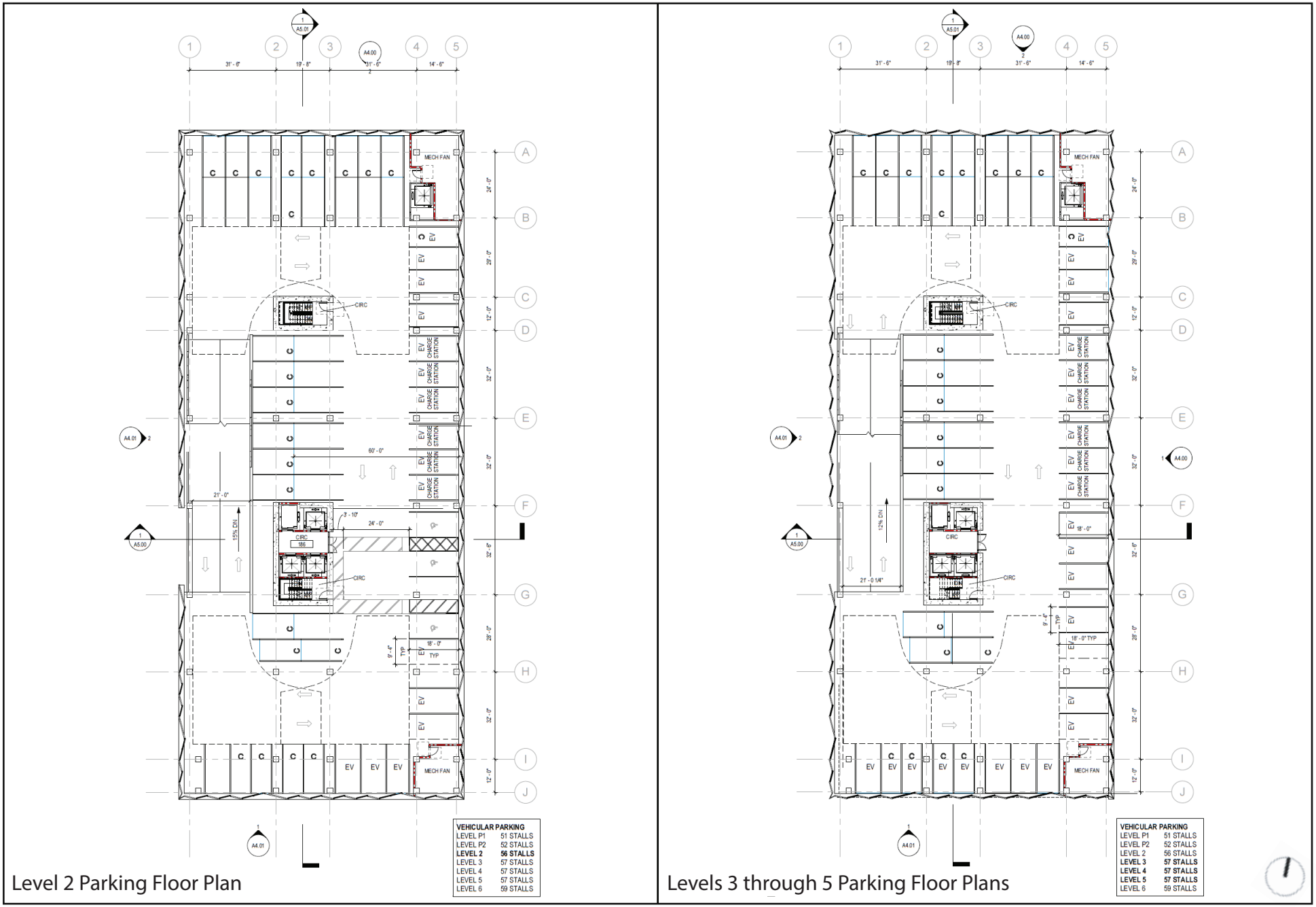
Source: Ehrlich Yanai Rhee Chaney Architects, October 29, 2020.

Figure 3.8
Ground Floor Plan



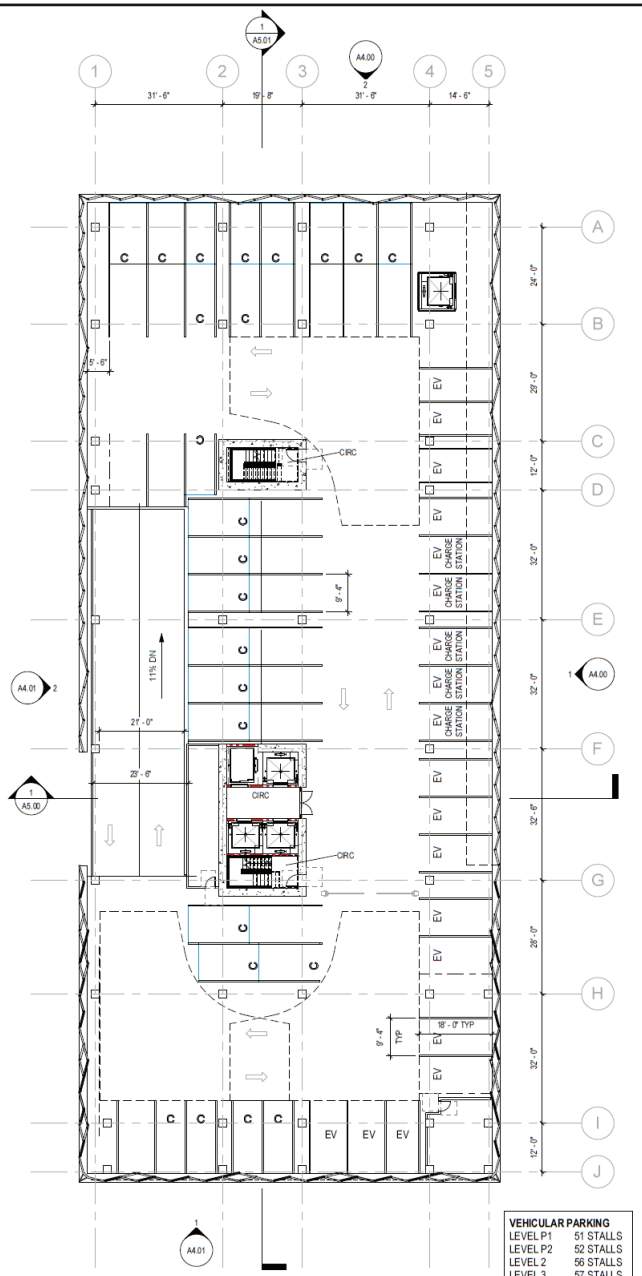
Source: Ehrlich Yanai Rhee Chaney Architects, October 29, 2020.

Figure 3.9
Enlarged Retail Floor Plan

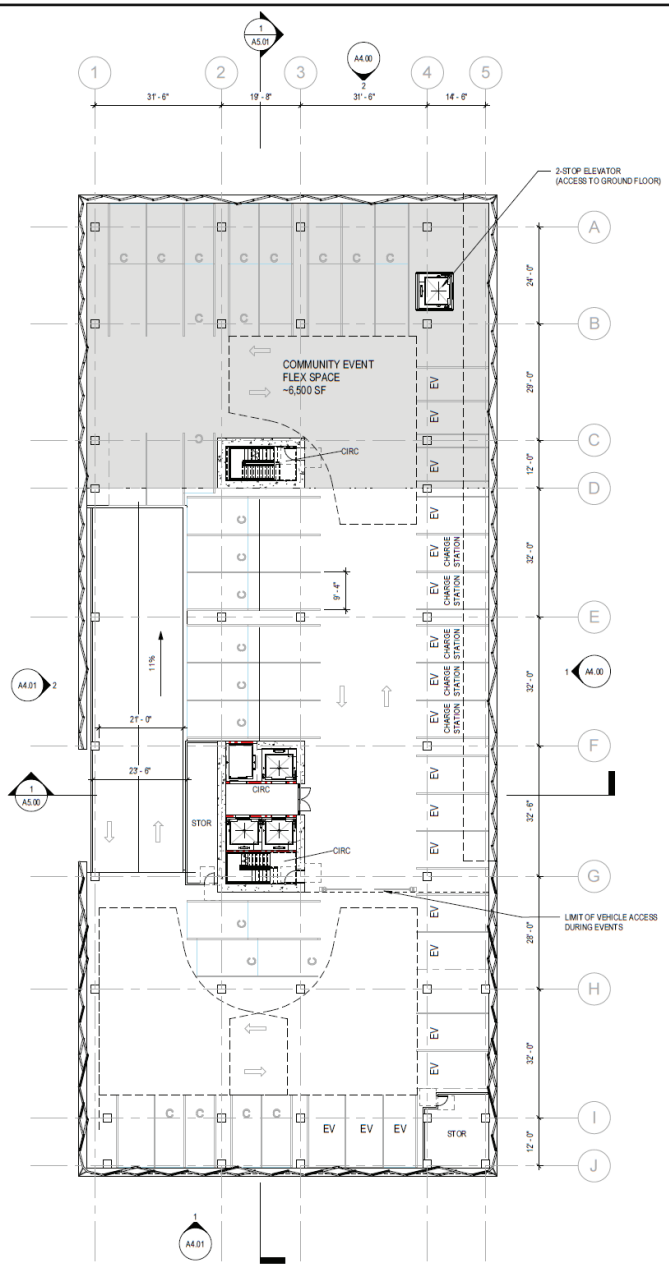


Source: Ehrlich Yanai Rhee Chaney Architects, October 29, 2020.

Figure 3.10
Level 2 & Levels 3 through 5 Parking Floor Plans



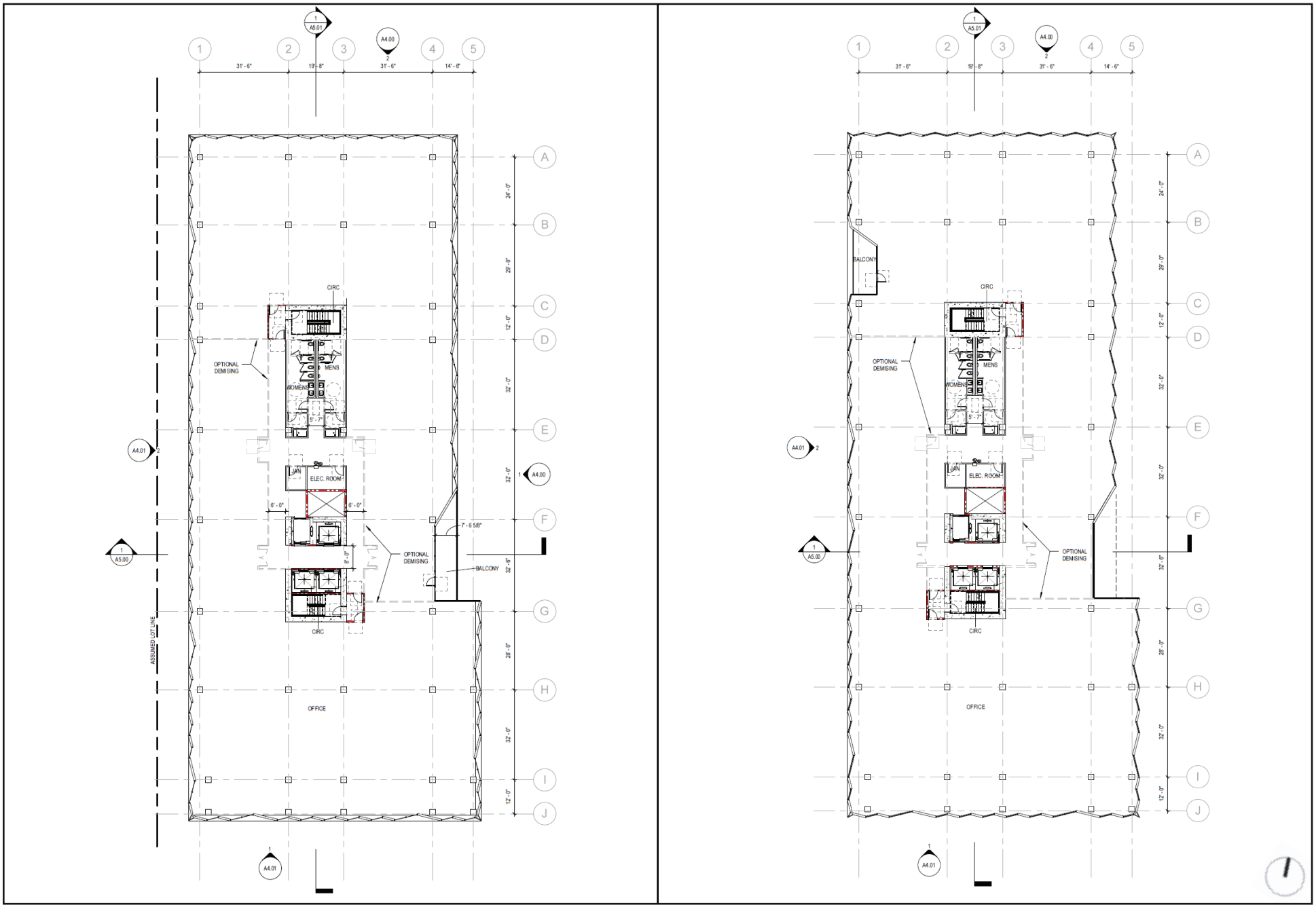
Level 6 Parking Floor Plan



Level 6 Parking Community Space Floor Plan

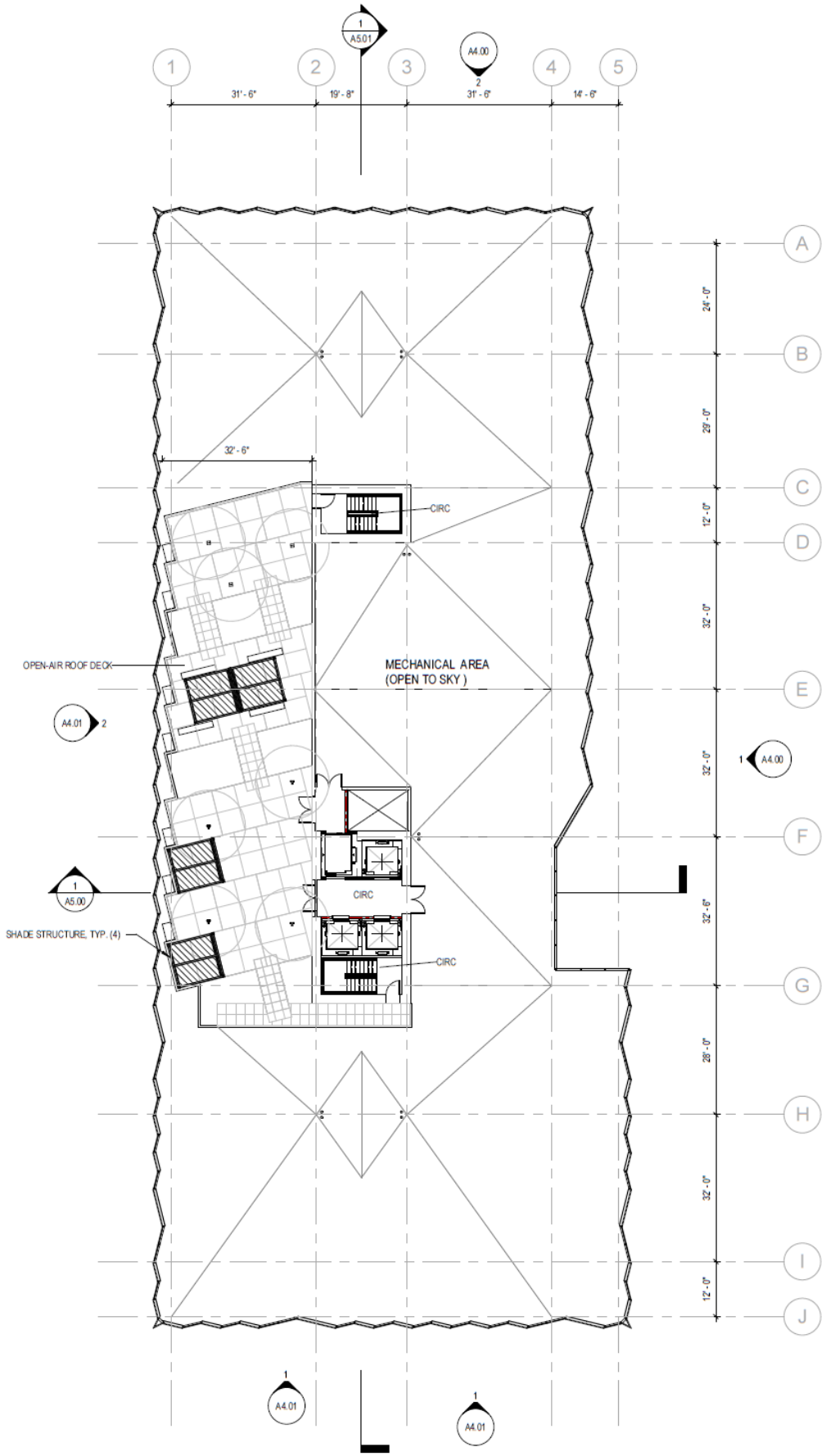
Source: Ehrlich Yanai Rhee Chaney Architects, October 29, 2020.

Figure 3.11
Level 6 Parking Floor Plan & Level 6 Parking Community Space Floor Plan



Source: Ehrlich Yanai Rhee Chaney Architects, October 29, 2020.

Figure 3.12
Typical Office Floor Plans



Source: Ehrlich Yanai Rhee Chaney Architects, October 29, 2020.

Figure 3.13
Roof Plan

2. Floor Area

The Project Site includes approximately 71,483 square feet of gross lot area (1.64 acres) and 68,893 square feet of buildable lot area (1.58 acres) after all right-of-way dedications. The Project Site is currently zoned M3-1-RIO, which limits development to a 1.5:1 FAR. Per LAMC Section 12.32F, the Applicant is seeking a Height District Change from M3-1-RIO to M3-2D-RIO for the Project Site. Pursuant to LAMC Section 12.32, the Applicant is also seeking a General Plan Amendment to modify footnotes 1 and 6 of the Central City North Community Plan. Footnote 1 of the Central City North Community Plan limits the Project Site to Height District No. 1. Footnote 6 states that development exceeding an FAR of 1.5:1 up to 3:1 on properties designated as Height District No.1 may be permitted through a Zone Change Height District Change procedure, including environmental clearance. The requested Zone Change Height District Change would modify both footnotes to include the proposed boundaries and development standards of the Project.

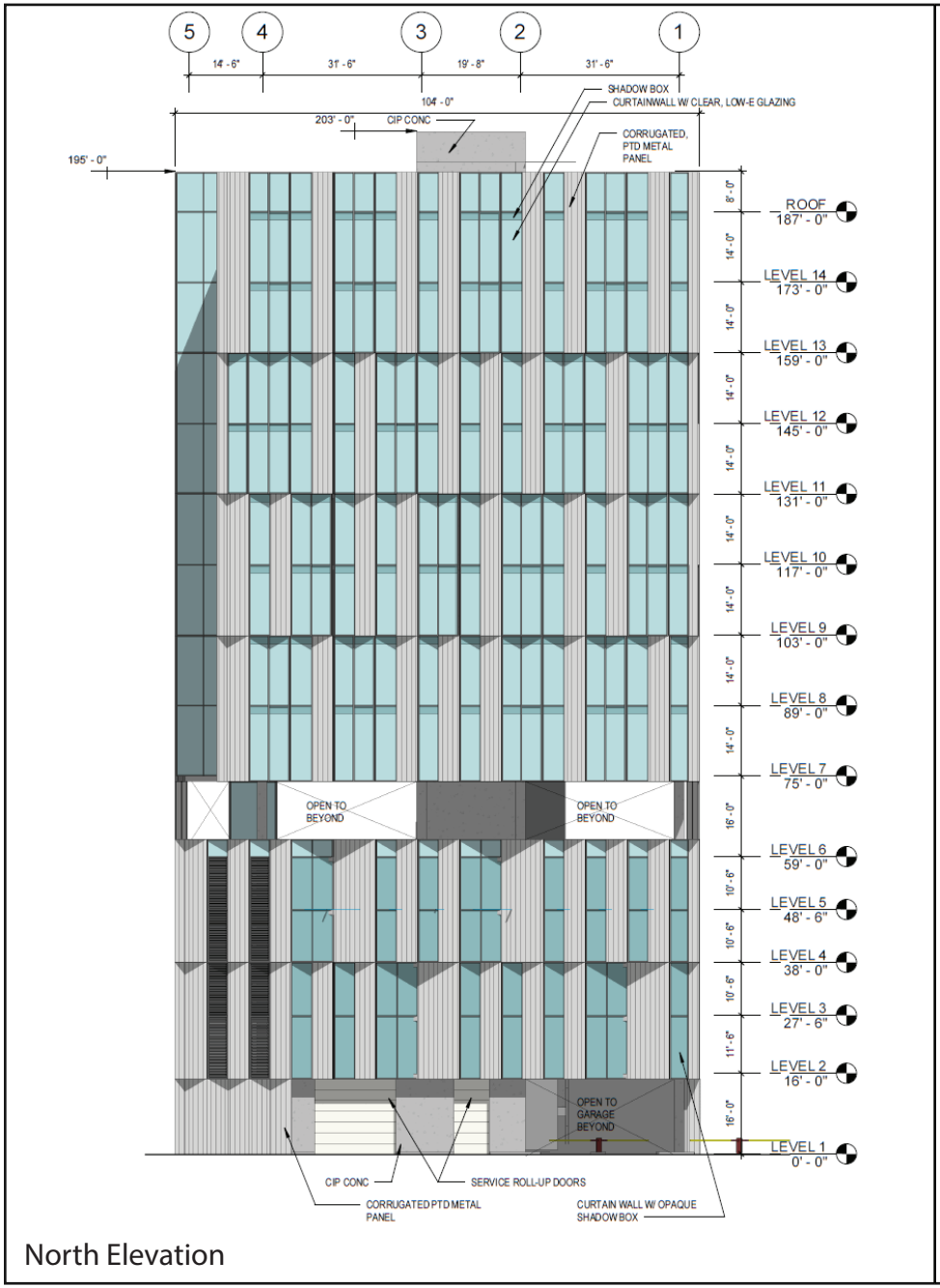
With approval of the Height District Change, the allowable FAR would increase from 1.5:1 to 4.5:1, resulting in a development potential of up to 310,018 square feet on the Project Site. The Project would create approximately 188,954 new square feet of developed floor area. Combined with the 107,224 square feet of existing floor area from the 640 S. Santa Fe Avenue building, the total proposed floor area across the Project Site would be 296,178 square feet, resulting in a total FAR of 4.3:1.

3. Building Height

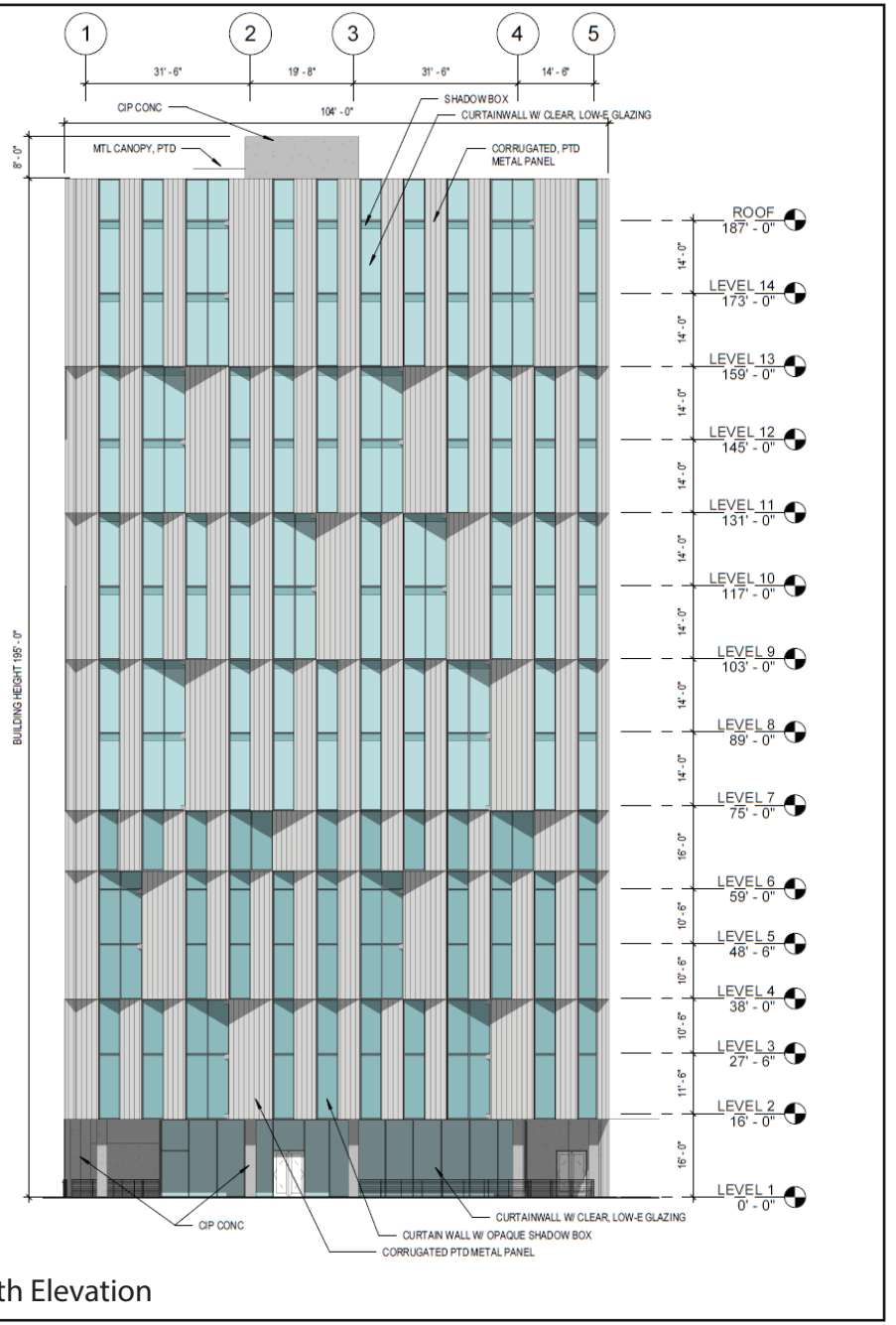
As stated previously, the Project Site is located in Height District No. 1, which does not set a specific height limit for development for the Project Site. As noted above, the Applicant is seeking a Height District Change from Height District No. 1 to Height District No. 2. Height District No. 2 also does not set a specific height limit for development. The Project proposes a maximum height of 195 feet above grade and a total of 14 stories. Refer to Figure 3.14 and Figure 3.15 for the elevations of the proposed building. Illustrations depicting the building sections of the Project are provided in Figure 3.16.

4. Setbacks

Pursuant to LAMC Section 12.20, there are no front, side, or rear yard setbacks required in the M3 Zone. Nevertheless, the Project would provide an 8-foot and 6-inches front yard setback along Mesquit Street; a 16-foot and 2-inches side yard setback along Jesse Street; a 10-foot and 10-inches side yard setback along the paseo between the Project and the 640 S. Santa Fe Avenue building; and a rear yard setback of 20 feet from the LADWP substation property located to the north.



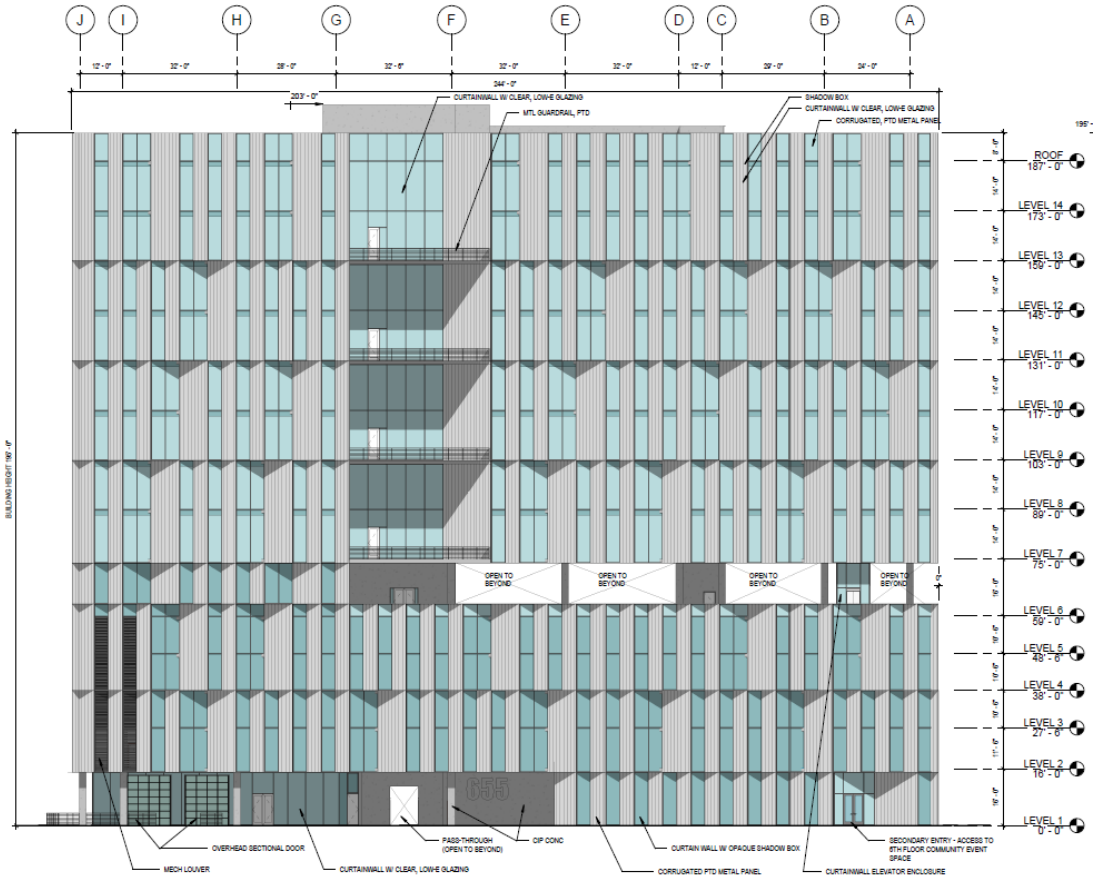
North Elevation



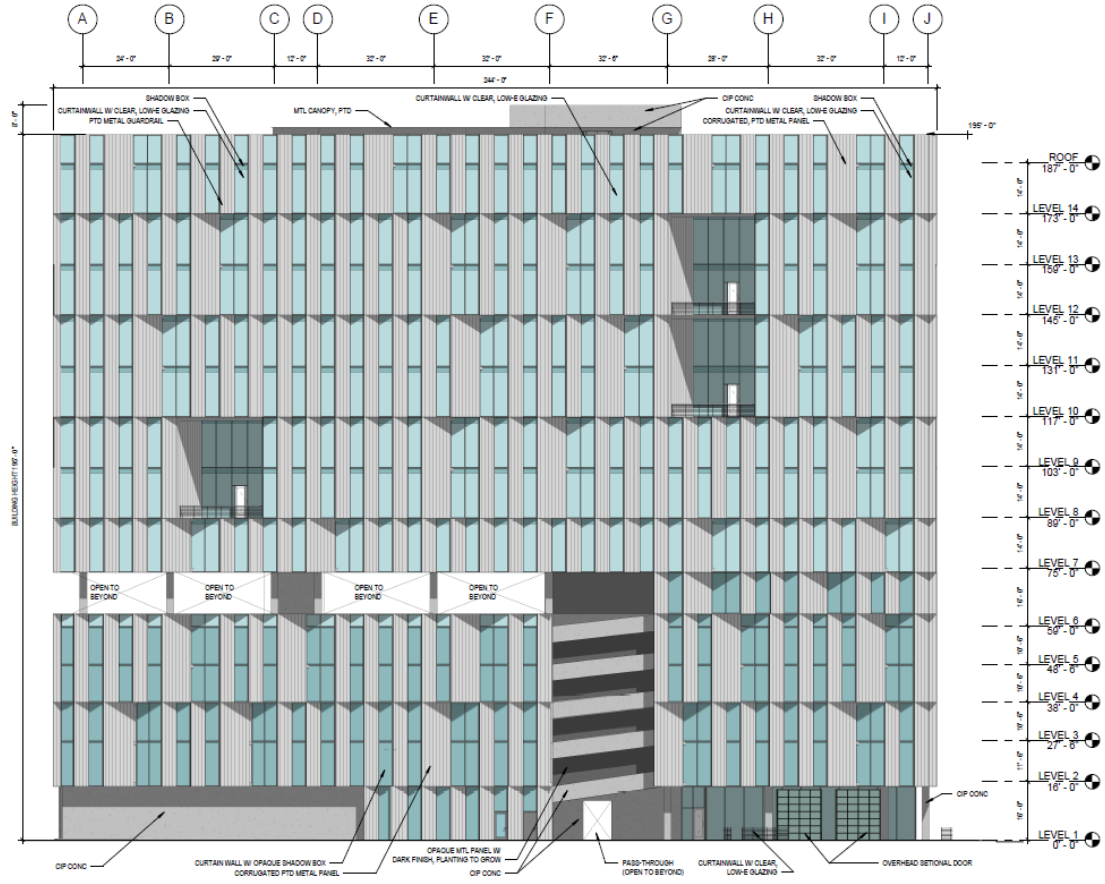
South Elevation

Source: Ehrlich Yanai Rhee Chaney Architects, October 29, 2020.

Figure 3.14
North and South Elevations



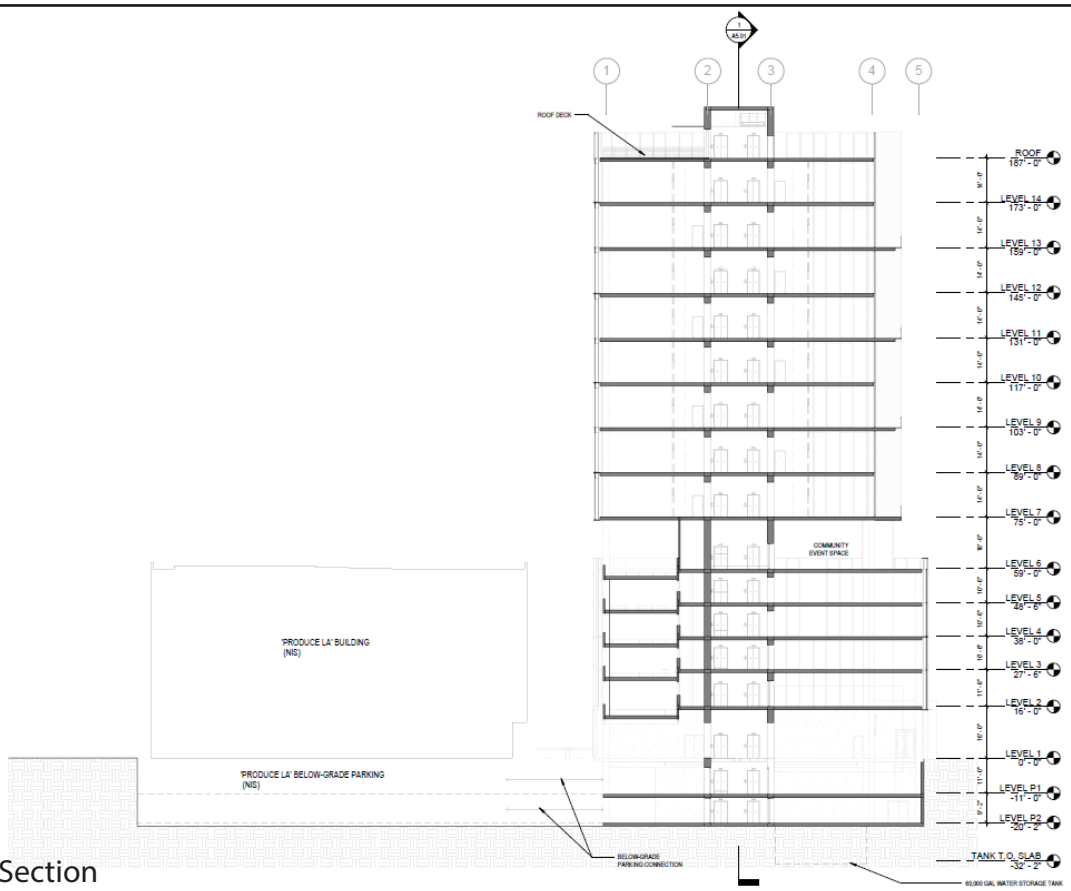
East Elevation



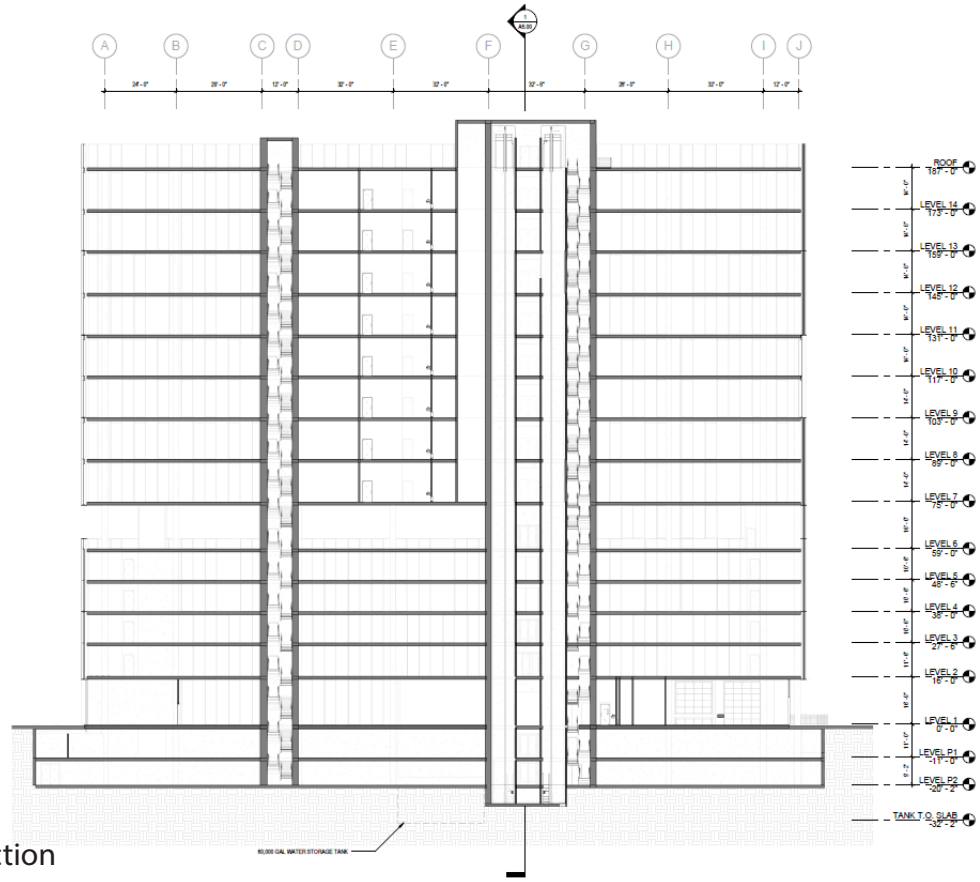
West Elevation

Source: Ehrlich Yanai Rhee Chaney Architects, October 29, 2020.

Figure 3.15
East and West Elevations



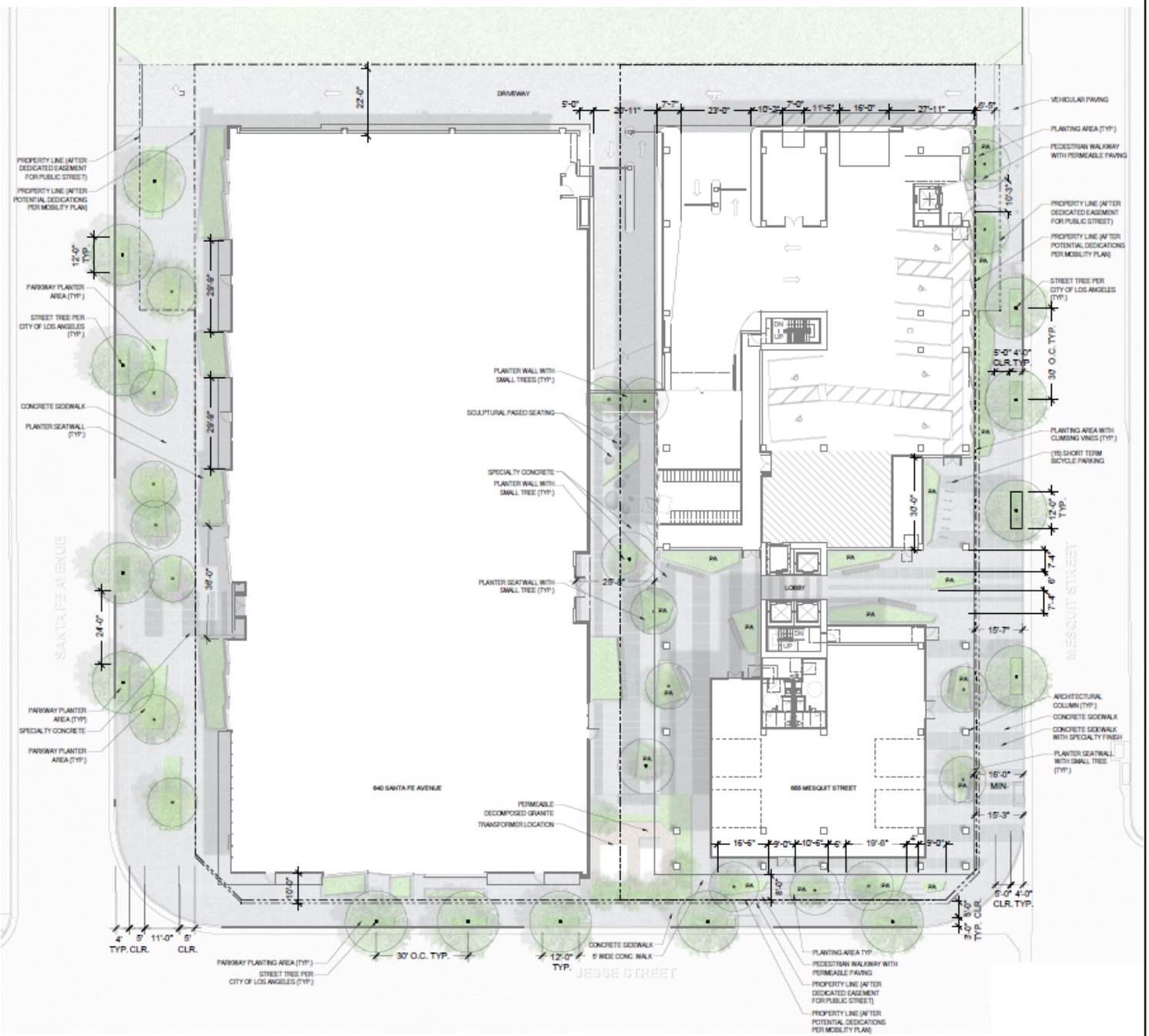
Transverse Section



Longitudinal Section

Source: Ehrlich Yanai Rhee Chaney Architects, October 29, 2020.

Figure 3.16
Building Sections



Source: Ehrlich Yanai Rhee Chaney Architects, October 29, 2020.

Figure 3.17
Street Level Site Plan

Source: Ehrlich Yanai Rhee Chaney Architects, October 29, 2020.

Figure 3.18
Roof Level Site Plan

5. Design and Architecture

The Project proposes the demolition of an existing surface parking lot on the eastern half of the Project Site, into a 14-story office and ground floor commercial building with two levels of subterranean parking and five levels of parking above grade. The mass and scale of the Project building would be articulated through two types of façade treatments, the use of inset building entrances at the ground level, and balconies on the upper floors. The parking levels would be screened with a combination of solid metal panels and opaque glass mirroring, with similar metal and glass façades on the office floors above. The ground floor and office levels (levels 7 through 14) would use alternating panels, windows, and balconies canted at varying angles to enhance building articulation. Materials and patterns would complement the adjacent 640 S. Santa Fe Avenue building and provide continuity with the modern-industrial aesthetic of the Arts District.

The Project would be required to comply with the L.A. Green Building Code, effective as of January 1, 2020, which requires the use of numerous conservation measures, beyond those required by Title 24 of the California Administrative Code. The L.A. Green Building Code contains both mandatory and voluntary green building measures to conserve energy. As further described in the Energy Use Analysis section in the IS/MND, below, compliance with Title 24 of the California Administrative Code and the L.A. Green Building Code would reduce the Project's energy consumption. Architectural renderings of the Project are provided in Figure 3.19 through Figure 3.21.

6. Open Space and Landscaping

The Project would include the construction of a 14-story office and ground floor commercial building. Pursuant to LAMC Section 12.20, there are no open space requirements in the M3 Heavy Industrial Zone. Nevertheless, the Project would comply with the landscape requirements of the Los Angeles Landscape Ordinance No. 170,978, the Los Angeles Landscape Guidelines, and the Los Angeles Department of City Planning landscape requirement regarding providing an open space plan table. Pursuant to LAMC Section 13.17 F.1, the Project would provide at least 75 percent of the landscaped area as California native species or species defined as WatershedWise,[4] or species listed in the Los Angeles County River Master Plan Landscaping Guidelines and Plant Palettes.[5]

[4] *"WatershedWise" plants are plants included in the WatershedWise Plant List published by the Council for Watershed Health, website: https://www.watershedhealth.org/, accessed January 2021.*

[5] *Los Angeles County River Master Plan Landscaping Guidelines and Plant Palettes, website: http://ladpw.org/wmd/watershed/la/lar_planting_guidelines_webversion.pdf, accessed January 2021.*

View of Southeast Corner

View of Southwest Corner

Source: Ehrlich Yanai Rhee Chaney Architects, October 29, 2020.

Figure 3.19
Southeast and Southwest Architectural Renderings

View of Ground Floor Corner at Mesquit Street and Jesse Street

View of Exterior Ground Floor Lobby at Mesquit Street

Source: Ehrlich Yanai Rhee Chaney Architects, October 29, 2020.

Figure 3.20
Ground Floor Mesquit Street and Jesse Street Architectural Renderings

View of Northeast Corner

View of Paseo Between 655 Mesquit and 640 Santa Fe

Source: Ehrlich Yanai Rhee Chaney Architects, October 29, 2020.

Figure 3.21
Northeast Corner and Paseo Architectural Renderings

The Project would provide a total of 15,547 square feet of open space area, including 12,261 square feet of ground floor hardscape area (641 square feet of which would be permeable pavement) and 3,286 square feet of ground floor landscaped area. In addition to this, 3,685 square feet of open space would be provided on the roof deck as a rooftop garden area (2,774 square feet of which would be hardscape area and 911 square feet of which would be landscaped area). The Project would provide planters, benches and/or other fixed seating, shrubbery, flowering plants and wall climbing vines, and trees located along the perimeter of the building and at the street curb. Various types of vegetation are proposed for the paseo courtyard, balconies, and ground floor entrance and lobby areas, including hanging plants, shrubs, and grasses. A total of 20 trees would be planted on the Development Site for the Project in accordance with Los Angeles Urban Forestry Division requirements, including 13 ground level trees and 7 trees located on the rooftop garden. Additionally, a 6,500 sf portion of the top parking level (level 6) is proposed to function as a flexible community space when not in use for parking, which would provide an intermittent source of additional open space on-site. Figures 3.17 and 3.18 include the ground level landscape plan and rooftop landscape plan, respectively, and Figure 3.11 includes parking level 6 as a flexible community space.

7. Access, Circulation, and Parking

Parking for the Project would be provided in two levels of subterranean parking and five levels of above grade parking (levels 2 through 6). Vehicular access to the Project building's parking levels would be provided by a full access driveway along the northern property line of the Development Site that abuts the LADWP substation property, with driveway access connecting from both Mesquit Street and Santa Fe Avenue. The proposed 1,200 square-foot loading zone would also be accessed by this driveway. Access to the two subterranean levels would be provided by a ramp shared with the 640 S. Santa Fe Avenue building, and access to the remaining five levels of above grade parking would be provided by an interior ramp within the Project building footprint. See Figure 3.7 for the two levels of subterranean parking and Figures 3.10 and 3.11 for the five levels of above grade parking.

Pursuant to LAMC 12.21.A4(x)(3)(6) and the requirements of the State Enterprise Zone (ZI-2129) parking standards, the Project would be required to provide two (2) vehicle parking spaces for every 1,000 square feet of office use. The Project would also be required to provide two (2) vehicle parking spaces for every 1,000 square feet of ground floor commercial uses. For the purposes of calculating required parking, a breakdown of 184,629 square feet of office space and 4,325 square feet of commercial retail and restaurant space was used to calculate a total of 379 parking spaces required. An additional 54 parking spaces were added to account for the 54 parking spaces that would be removed from the eastern half of the Project Site. Therefore, the Project has a total of 433 required parking spaces.

Pursuant to LAMC Ordinance 185,480 and codified in LAMC 12.21.A.4, for a non-residential building, up to 30 percent of the LAMC required parking may be reduced and replaced with bicycle parking at a ratio of 1 vehicle space removed for every 4 bicycle parking spaces. Replacement bicycle spaces can be either required or non-required spaces up to a total of 20 percent of the vehicle parking requirement for non-residential uses. A total of 36 vehicle parking spaces were replaced with attended bicycle parking, decreasing the total required amount of vehicle parking

spaces to 397 spaces. As such, the Project would provide 397 vehicle parking spaces, as shown in Table 3.3, below. Nine vehicle parking spaces would be compliant with the Americans with Disabilities Act ("ADA"), 120 spaces would be Electric Vehicle ("EV") capable, and 40 spaces would contain EV charging stations. A maximum of 40 percent of vehicle parking spaces are permitted to be compact. A total of 39 percent (155 of 397) of the proposed vehicle parking spaces in the Project would be compact.

Table 3.3
Summary of Required and Proposed Vehicle Parking Spaces

Description	Quantity	Rate [a]	Spaces
Required			
Office	184,629 sf	2/1,000 sf	370
Commercial	4,325 sf	2/1,000 sf	9
		Subtotal Parking Required:	**379**
Displaced spaces from the 640 S. Santa Fe Avenue Project surface parking lot:			*54*
		Total Parking Required:	**433**
Proposed			
		(Subtract 36 spaces pursuant to LAMC 12.21.A.4) [b]	*-36*
		Total Proposed Parking:	**397**

Notes: sf = square feet
[a] *Pursuant to LAMC 12.21A4(x)(3)(6).*
[b] *LAMC Section 12.21 A.4 states that for a nonresidential building, up to 20 percent of code required vehicle parking may be reduced and replaced with bicycle parking at a ratio of 1 vehicle space removed for every 4 bicycle parking spaces.*
Source: Ehrlich, Yanai, Rhee, Chaney Architects, October 29, 2020.

Pursuant to LAMC Section 12.21 A.16(a)(2), the Project is also required to provide on-site bicycle parking for office uses in the form of one space per 10,000 square feet for short-term bicycle parking with a minimum of 2 spaces, and one space per 5,000 square feet for long-term bicycle parking with a minimum of 2 spaces. As such, the Project would be required to provide a total of 19 short-term and 37 long-term bicycle parking spaces for its proposed office uses. For the proposed ground floor commercial uses, the Project is required to provide one space per 2,000 square feet for both short- and long-term bicycle parking, with a minimum of 2 spaces for both short- and long-term parking. As such, the Project would be required to provide 2 short- and 2 long-term bicycle parking spaces for its proposed ground floor commercial uses. Therefore, the Project would be required to provide a total of 21 short-term bicycle parking spaces and 39 long-term spaces.

The Project would be consistent with the applicable bicycle parking requirements of the LAMC as amended by Ordinance No. 185,480, effective May 9, 2018, by providing 51 short-term and 95 long-term bicycle parking spaces for a total of 146 bicycle parking spaces, as shown in Table 3.4, below. In the event the floor area is reduced from the current plans, the amount of vehicle and bicycle parking would be revised accordingly to meet the LAMC requirements.

Table 3.4
Summary of Required and Proposed Bicycle Parking Spaces

Description	Quantity	Parking Required [a]		Total Spaces Required		Total Spaces Provided	
		Short-Term	Long-Term	Short-Term	Long-Term	Short-Term	Long-Term
Office	184,629 sf	1 / 10,000 sf	1 / 5,000 sf	19	37	--	--
Commercial	4,325 sf	1 / 2,000 sf	1 / 2,000 sf	2	2	--	--
TOTAL:	**--**	--	--	21	39	**51**	**95**

Notes: sf = square feet
[a] LAMC Table 12.21 A.16.(a)(2) Required Bicycle Parking Spaces Per Building Floor Area as Defined under Section 12.03.
Source: Ehrlich, Yanai, Rhee, Chaney Architects, October 29, 2020.

8. Lighting and Signage

Exterior lighting features within the Project would consist of low-level illuminated pedestrian walkways and lighting within common open space areas, parking areas, and the outdoor paseo courtyard. Lighting would meet the requirements of the RIO District and be designed and installed with shielding to reduce glare on neighboring properties. On-site tenant identification signage and wayfinding signs would be provided consistent with the LAMC. There is no proposed Off-site advertising signage.

9. Site Security

During construction, the Project Site would be secured with perimeter fencing and monitored by on-site security personnel. During operations, security would be provided via site planning and secured access points of entry. The plans for the Project would incorporate security design measures for semi-public and private spaces, which may include, but not be limited to, access control to the building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, and location of building entrances in high-foot traffic areas. Additional security measures would be in place during operation of the Project to maintain responsible management of restaurant uses that sell alcohol, including, but not limited to, restricting types of restaurant uses to avoid potential nuisances, limiting operational hours, and requiring adequate security to address any neighbor complaints or concerns. The proposed building would also provide on-site security personnel during operating hours and as needed, such as using parking level 6 as a community space when not in use as parking.

10. Sustainability Features

The Project would be required to comply with the L.A. Green Building Code. The L.A. Green Building Code, effective as of January 1, 2020, requires the use of numerous conservation measures, beyond those required by Title 24 of the California Administrative Code. The L.A. Green Building Code contains both mandatory and voluntary green building measures to conserve energy. As further described in the Energy Use Analysis section in the IS/MND, below,

compliance with Title 24 of the California Administrative Code and the L.A. Green Building Code would reduce the Project's energy consumption.

11. Anticipated Construction Schedule

To analyze impacts associated with air quality, this analysis assumes a Project construction schedule of approximately 24 months, with final buildout occurring in 2025. Construction activities associated with the Project would be undertaken in four main steps: (1) demolition and site clearing; (2) grading, excavation, and foundations; (3) building construction; and (4) finishing and architectural coatings. All construction activities would be performed in accordance with all applicable State and federal laws and City Codes and policies with respect to building construction and activities.

As provided in Section 41.40 of LAMC, the permissible hours of construction within the City are 7:00 A.M. to 9:00 P.M. Monday through Friday, and between 8:00 A.M. and 6:00 P.M. on any Saturday or national holiday. No construction activities are permitted on Sundays. The Project would comply with these restrictions.

1. Demolition/Site Clearing Phase

This phase would include the demolition of the existing surface parking lot on the eastern half of the Project Site. In addition, this phase may include the removal of fences and associated debris to construct the Project. The demolition and site-clearing phase would be completed in approximately one month.

2. Grading, Excavation, and Foundation Phase

After the completion of the demolition and site clearing phase, the grading and excavation phase for the Project would occur over approximately three months and would involve an excavation depth of approximately 32 feet below ground surface to ensure the proper base and slope for the proposed 14-story building's slab foundation. The two subterranean vehicle parking levels would begin construction at approximately 25 feet below ground surface. Approximately 31,500 cubic yards of soil export to be hauled off site.

3. Building Construction Phase

The building construction phase consists of below and above grade structures and is expected to occur for approximately 16 months. The building construction phase includes the construction of the proposed building, connection of utilities to the building, building foundations, laying irrigation for landscaping, and landscaping the Project Site.

4. *Finishing/Architectural Coating Phase*

The finishing/architectural coating phase is expected to occur over approximately four months. During this phase, interior cabinets and lighting fixtures would be installed, interior and exterior wall finishing and paint would be applied, and the installation of windows, doors, and cabinetry would take place.

Temporary Right-of-Way Encroachment

Most construction activities for the Project would be anticipated to be contained within the Development Site. Site deliveries and the staging of all equipment and materials would be organized in the most efficient manner possible on-site to mitigate any temporary impacts to the neighborhood and surrounding traffic. However, construction activities may encroach into the parking lane along the western side of Mesquit Street and commercial loading lane on the northern side of Jesse Street. Construction activities may also require the short-term closure of the sidewalks closest to the Project Site on Mesquit Street and Jesse Street. Although potential sidewalk closures would block pedestrian circulation on the western side of Mesquit Street and the northern side of Jesse Street, the presence of sidewalks on the other sides of these streets would continue to ensure pedestrian circulation around the Project Site. Any construction activities that would necessitate temporary lane closures or right-of-way closures (including sidewalks) along Mesquit Street and/or Jesse Street on an intermittent basis for utility relocation/hook ups, delivery of materials, or other construction activities, would be properly permitted by City agencies and would conform to City standards.

Haul Route

All construction and demolition debris would be recycled to the maximum extent feasible. For recycling efforts, it was assumed that all recyclable construction and demolition debris would be hauled to the Waste Management Downtown Diversion recycling facility, located at 2424 E. Olympic Boulevard in Los Angeles, which is located approximately 0.7 mile (driving distance) south of the Project Site (approximately 1.4 miles round trip).[6] Inert soil would likely be hauled to an appropriate fill site within the region or the Azusa Land Reclamation Landfill, which accepts inert soil material. The Azusa Land Reclamation Landfill is approximately 25 miles east of the Development Site (approx. 50 miles round trip).

Demolition debris from the Development Site that cannot be recycled or diverted would be hauled to the Sunshine Canyon Landfill, which accepts construction and demolition debris from areas within the City of Los Angeles. The Sunshine Canyon Landfill is approximately 30 miles north of the Development Site (approx. 60 miles round trip). Soil export would be disposed at the Azusa Land Reclamation landfill, which accepts inert waste. The Azusa Land Reclamation landfill is located approximately 23 miles northeast of the Project Site (approx. 46 miles round trip).

The anticipated haul route departing from the Development Site to the Waste Management Downtown Diversion recycling facility would travel south along Santa Fe Avenue and east on Olympic Boulevard. The haul route departing from the Waste Management Downtown Diversion recycling facility to the Project Site would travel west on Olympic Boulevard and north on Santa Fe Avenue.

The haul route departing from the Development Site to Sunshine Canyon Landfill and Azusa Land Reclamation would travel west along Jesse Street, south along Mateo Street, and east along 7th

[6] *Construction and Demolition Debris Recycling Facilities in Los Angeles County, updated February 19, 2020, website: https://dpw.lacounty.gov/epd/CD/cd_attachments/Recycling_Facilities.pdf, accessed December 2020.*

Street to the I-5 Freeway onramp from Breed Street. The haul route departing from Sunshine Canyon Landfill and Azusa Land Reclamation to the Project Site would utilize the I-10 7th Street offramp, travel west on 7th Street, north on Mateo Street, and east on Jesse Street. The haul routes specified above may be modified in compliance with applicable City policies and in consultation with DOT.

12. Related Projects

In accordance with CEQA Guidelines Section 15064(h), this IS/MND includes an evaluation of the Project's cumulative impacts. The guidance provided under CEQA Guidelines Section 15064 (h) is as follows:

> *"(1) When assessing whether a cumulative effect requires an EIR, the lead agency shall consider whether the cumulative impact is significant and whether the effects of the project are cumulatively considerable. An EIR must be prepared if the cumulative impact may be significant and the project's incremental effect, though individually limited, is cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.*
>
> *(2) A lead agency may determine in an initial study that a project's contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus is not significant. When a project might contribute to a significant cumulative impact, but the contribution will be rendered less than cumulatively considerable through mitigation measures set forth in a mitigated negative declaration, the initial study shall briefly indicate and explain how the contribution has been rendered less than cumulatively considerable.*
>
> *(3) A lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program (including, but not limited to, water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plan, plans or regulations for the reduction of greenhouse gas emissions) that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area in which the project is located. Such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. When relying on a plan, regulation or program, the lead agency should explain how implementing the particular requirements in the plan, regulation or program ensure that the project's incremental contribution to the cumulative effect is not cumulatively considerable. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding that the project complies with the specified plan or mitigation program addressing the cumulative problem, an EIR must be prepared for the project.*

(4) The mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project's incremental effects are cumulatively considerable."

In light of the guidance summarized above, an adequate discussion of a project's significant cumulative impact, in combination with other closely related projects, can be based on either: (1) a list of past, present, and probable future producing related impacts; or (2) a summary of projections contained in an adopted local, regional, statewide plan, or related planning document that describes conditions contributing to the cumulative effect (CEQA Guidelines Section 15130(b)(1)(A)-(B)). The lead agency may also blend the "list" and "plan" approaches to analyze the severity of impacts and their likelihood of occurrence. Accordingly, all proposed, recently approved, under construction, or reasonably foreseeable projects that could produce a related or cumulative impact on the local environment, when considered in conjunction with the Project, were identified for evaluation.

The related projects identified are included in Table 3.5, Related Projects List, below. A total of 26 related projects were identified within the vicinity of the Project Site in the City of Los Angeles. An analysis of the cumulative impacts associated with these related projects and the Project are provided under each individual environmental impact category in Section 4 of this IS/MND. The locations of the related projects are shown in Figure 3.22, Location of Related Projects.

Table 3.5
Related Projects List

Project Number	Project Name	Location/Address	Project Description	Size	Units
1	Office	540 Santa Fe Ave	Office	89,825	sf
2	Camden Arts Project	1525 Industrial St	Apartments Office Restaurant Retail	328 27,300 5,700 6,400	du sf sf sf
3	Restaurant	500 S. Mateo St	Restaurant	12,882	sf
4	Mixed-Use	2130 E. Violet St	Office Restaurant Retail	94,000 4,000 3,500	sf sf sf
5	Mixed-Use Project	1800 E. 7th St	Apartments Office Retail	122 4,605 3,245	du sf sf
6	Mixed-Use	520 S. Mateo St	Apartments Restaurant Retail Office	600 15,000 15,000 30,000	du sf sf sf
7	Palmetto	527 Colyton St	Apartments Restaurant	346 24,792	du sf
8	Arts District Center	1101-1129 E. 5th St 445 Colyton St	Apartments Retail Hotel	129 26,979 113	du sf rm

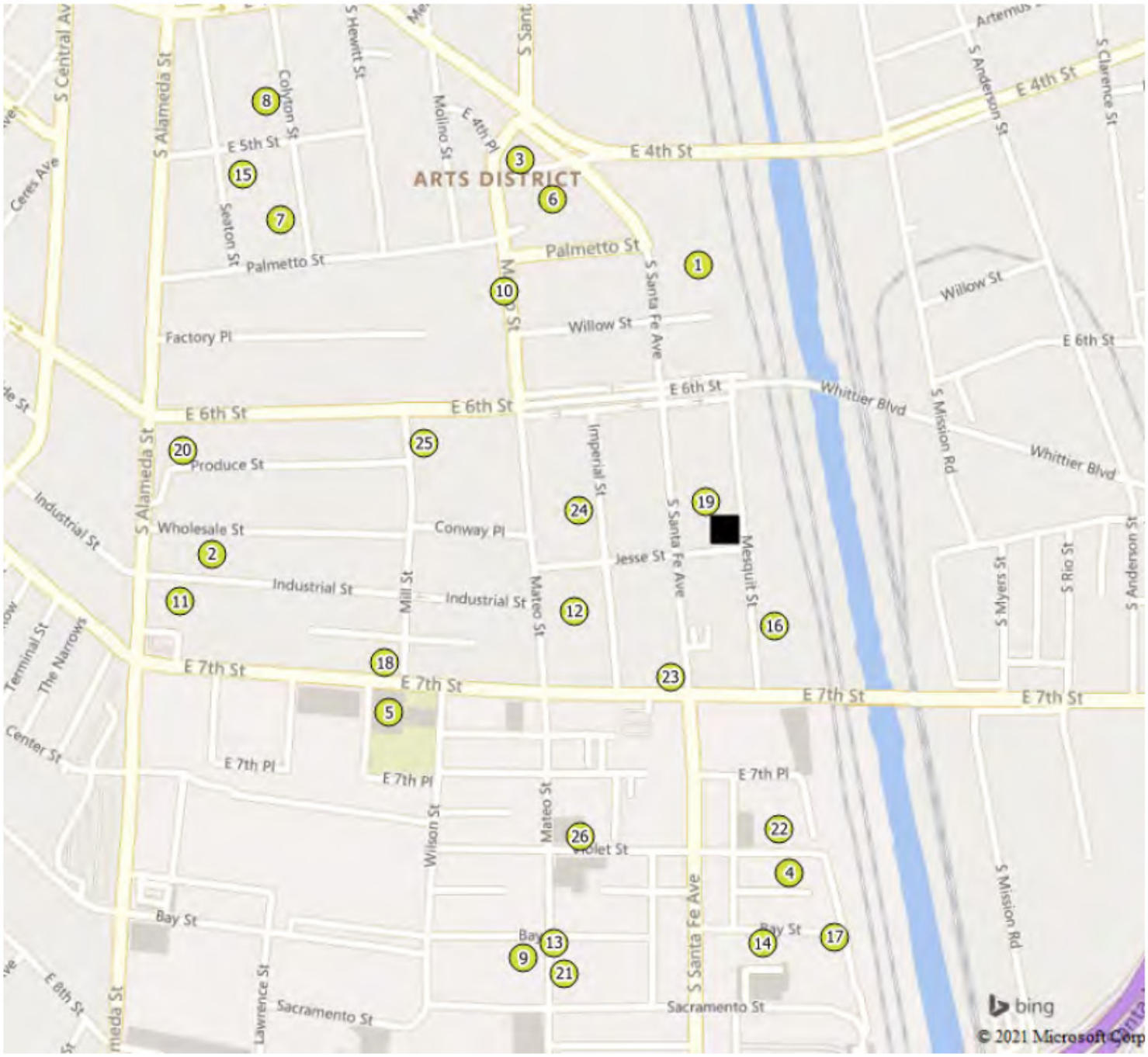
Table 3.5
Related Projects List

Project Number	Project Name	Location/Address	Project Description	Size	Units
			Quality Restaurant	15,197	sf
			High-Turnover Restaurant	13,634	sf
			Fast-Food Restaurant	2,888	sf
			Art Gallery	10,341	sf
			Design Incubator	3,430	sf
9	Industrial Park	1005 S. Mateo St.	Industrial Park	94,849	sf
10	Retail	555 S. Mateo St	Retail	153,000	sf
11	Mixed-Use	668 Alameda St	Apartments	475	du
			Office	33,100	sf
			Specialty Retail	17,500	sf
			Restaurant	16,300	sf
			Supermarket	15,300	sf
12	Mixed-Use	676 S. Mateo St	Apartments	185	du
			Retail	8,375	sf
			Office	3,900	sf
			Restaurant	15,005	sf
13	Mixed-Use	1000 S. Mateo St	Apartments	113	du
			Commercial	134,000	sf
14	2110 Bay Development	2110 Bay St	Apartments	99	du
			Affordable Housing	11	du
			General Office	113,350	sf
			Shopping Center	43,657	sf
15	1100 E. 5th Street (Mixed-Use)	1100 E. 5th St	Apartments	220	du
			Retail	9,250	sf
			Office	20,021	sf
			Restaurant	19,609	sf
16	670 Mesquit Project	670 Mesquit St	Office	944,055	sf
			Apartments	308	du
			Hotel	236	rm
			Retail	79,240	sf
			Restaurant	89,576	sf
			Gym	62,148	sf
			Event Space	93,617	sf
			Grocery	56,912	sf
17	Hyperloop One / Expand Creative Office Campus	2159 Bay St	Creative Office Space	217,189	sf
			Restaurant	5,000	sf
18	1745 E. 7th St	1745 E. 7th St	Apartments	57	du

Table 3.5
Related Projects List

Project Number	Project Name	Location/Address	Project Description	Size	Units
			Commercial	6,000	sf
19[a]	640 S. Santa Fe Ave	640 S. Santa Fe Ave	General Office Retail Restaurant	91,185 9,430 6,550	sf sf sf
20	6th & Alameda	1206 E. 6th St	Apartments Condominiums Office Community-Serving Commercial Art Space Hotel School	1,305 431 253,514 127,609 22,429 412 300	du du sf sf sf rm stu
21	Mixed-Use	1024 S. Mateo St	Apartments Office Restaurant Retail Arts & Production	104 95,000 13,126 13,974 5,519	du sf sf sf sf
22	Mixed-Use	2143 E. Violet St	Apartments High-Turnover Restaurant Office	347 21,858 187,374	du sf sf
23	2053 E. 7th St	2053 E. 7th St	Hotel	103	rm
24	641 Imperial St	641 Imperial St	Apartments Retail	140 7,375	du sf
25	Mixed-Use	1340 E. 6th St	Live/Work Residence Units Commercial	193 255,088	du sf
26	Mixed-Use	826 S. Mateo St	Apartments Retail Restaurant	90 11,000 5,600	du sf sf

Notes: du = dwelling unit, sf = square feet; rm = room; stu = student
[a] *Related Project No. 19 is the 640 S. Santa Fe Avenue Project located on the western portion of the Project Site. It is identified as a related project for purposes of LADOT's review of the non-CEQA traffic impact assessment.*
Source: The Mobility Group, April 2021.



Source: The Mobility Group, March 2021.

Figure 3.22
Related Projects Map

D. Requested Permits and Approvals

The list below includes the anticipated requests for approval of the Project. The IS/MND will analyze impacts associated with the Project and will provide environmental review sufficient for all necessary entitlements and public agency actions associated with the Project. The discretionary entitlements, reviews, permits and approvals required to implement the Project include, but are not necessarily limited to, the following:

1. Permit the construction of a 188,954 square foot, 14-story commercial office building consisting of approximately 184,629 square feet of office uses and approximately 4,325 square feet of ground floor commercial uses. The Project will include up to 397 vehicle parking spaces and 146 bicycle parking spaces.

Pursuant to Chapter 1, Article 2 of the City of Los Angeles Municipal Code ("LAMC") the Applicant hereby requests the following entitlements to permit the Project:

a. City-initiated General Plan Amendment ("GPA") to modify Footnotes 1 and 6 of the Central City North Community Plan to include the boundaries and development standards of the Project, pursuant to LAMC § 11.5.6.[7]

b. Height District change from the existing Height District 1 to Height District 2, pursuant to LAMC §12.32.F.

c. Master Conditional Use Permit to permit the sale of full line alcoholic beverages within four restaurants and bars, pursuant to LAMC § 12.24 W.1.

d. Site Plan Review for a project that results in an increase of 50,000 gross square feet or more of nonresidential uses, pursuant to LAMC § 16.05.

e. A Vesting Tentative Tract Map, pursuant to LAMC § 17.03 and 17.15.

In addition, pursuant to various sections of the LAMC, the Applicant will also request various ministerial administrative approvals and permits from the Los Angeles Department of Building and Safety and other municipal agencies for project construction actions, including but not limited to the following: demolition, grading, haul route, foundation, and building permits.

[7] *The Central City North Community Plan includes Footnote 1 for Height District 1 and Footnote 6 which states that, "for properties designated on zoning maps as Height District Nos. 1, 1L, 1VL, or 1XL (or their equivalent), development exceeding a floor area ratio of 1.5:1 up to 3:1 may be permitted through a zone change height district change procedure, including an environmental clearance." The Applicant is requesting a modification to these existing footnotes in order to construct the Project. No change in the land use designation is proposed as part of this request, as the Project Site will retain the existing Heavy Manufacturing land use designation.*

INITIAL STUDY / MITIGATED NEGATIVE DECLARATION

4. Environmental Checklist and Impact Analysis

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) as amended on January 1, 2021.

CEQA Guidelines Section 15125(a)(1) states in part that:

> "…[W]here existing conditions change or fluctuate over time, and where necessary to provide the most accurate picture practically possible of the project's impacts, a lead agency may define existing conditions by referencing historic conditions, or conditions expected when the project becomes operational, or both, that are supported with substantial evidence. In addition, a lead agency may also use baselines consisting of both existing conditions and projected future conditions that are supported by reliable projections based on substantial evidence in the record."

Consistent with this guidance, the IS/MND analyzes the Project utilizing the baseline conditions on the Project Site as they existed at the time the Notice of Intent to adopt the MND was published. At the time the Project application was filed, the Project Site was completing construction of a previously approved project which was approved in 2019 (Case No. ENV-2016-3860-CE).[8] Construction of the 640 S. Santa Fe Avenue Project was completed in April 2021 and it is currently a part of the physical conditions on the Project Site. Construction activities associated with the buildout of the 640 S. Santa Fe Avenue building are no longer occurring and the building is operational. For purposes of determining the environmental impacts associated with buildout of the Project, the environmental analysis is based on the reasonably foreseeable impacts that would occur as a result of the future buildout of the eastern portion of the Project Site, defined in the analysis as the Development Site.

Accordingly, the baseline environmental setting on the Project Site includes the operation of the four-story, 107,224 square-foot office and ground floor commercial building with two levels of subterranean parking on the western half of the Project Site and a surface parking lot on the eastern portion of the Project Site. The Project includes the redevelopment of the Development Site into a 14-story mixed-use commercial building with 188,954 square feet of floor area comprised of 184,629 square feet of office uses and approximately 4,325 square feet of ground floor commercial uses ("Project").

[8] *See City of Los Angeles determination Letter for Case No. ENV-2016-3860-CE (640 S. Santa Fe Avenue Project), May 6, 2019, included in Appendix M to this IS/MND.*

I. Aesthetics

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

In 2013, the State of California enacted Senate Bill 743 (SB 743),[9] which provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." Public Resources Code Section 21099 defines a "transit priority area" as an area within one-half mile of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." Public Resources Code Section 21064.3 defines "Major Transit Stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." Public Resources Code Section 21061.3 defines an "Infill Site" as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses. PRC Section 21099 defines an "employment center project" as "a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area." The Project Site meets these criteria because commercial uses are permitted in the M3-1-RIO zone and the Project Site is designated as a

[9] *SB 743 is codified as Public Resources Code Section 21099.*

transit priority area per the Department of City Planning's Zoning Information File ZI No. 2452, Transit Priority Areas (TPAs) / Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA.[10]

SB 743 and the subsequent guidance provided in ZI 2452 supersedes the aesthetic impact thresholds of significance that were previously adopted in the L.A. CEQA Thresholds Guide (2006). Accordingly, the Project's aesthetic impacts shall not be considered significant impacts on the environment pursuant to Public Resources Code Section 21099. Therefore. the aesthetics analysis below is provided for informational purposes only. While Section 21099 prohibits aesthetic impacts from being considered significant environmental impacts pursuant to CEQA, it does not affect the ability of the City of Los Angeles to implement design review through its ordinances or other discretionary powers.

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

No Impact. A significant impact may occur if the Project includes a proposal to develop or allow development in an existing natural open space area or has the potential to introduce features that would block or detract from the existing valued aesthetic quality of a scenic vista. Scenic vistas are generally described in two ways: panoramic views (visual access to a large geographic area, for which the field of view can be wide and extend into the distance) and focal views (visual access to a particular object, scene, or feature of interest).

The Project Site does not possess any unique aesthetic characteristics, such as architectural or historic significance or visual prominence, public plazas, art or gardens, trees protected by the City, pedestrian amenities, or landscaped parks. Further, the Project Site is not identified as a scenic vista in the City's Conservation Element. As shown in the site photographs depicted in Figure 3.4, Photographs of the Project Site and Figure 3.5, Photographs of the Surrounding Land Uses, the western half of the Project Site is currently developed with the 640 S. Santa Fe Avenue building, a four-story office building with ground floor commercial uses with two levels of subterranean parking. The eastern half of the Project Site, the Development Site for the Project, is currently a surface parking lot for the 640 S. Santa Fe Avenue building. The Project Site is immediately surrounded to the east, south, and west by a mix of office and industrial uses which range from one- to two-stories above grade, and the LADWP substation to the north. In the surrounding Project vicinity, there are developments which range from one- to seven-stories above grade. There are also several recently approved projects within a half mile of the Project Site that would range between two stories and 35 stories in height. The Project would be 14 stories and approximately 195 feet above grade at its highest point.

The surface topography is relatively level in the Project vicinity. Due to the relatively flat topography and extent of urban development within the immediate area, there are no scenic vistas or vantage points that offer views of scenic vistas. As part of the Proposed Project the surface parking lot developed as part of the 640 S. Santa Fe Avenue Project would be demolished to allow for the buildout of the 655 Mesquit Street Project. The Project would result in the buildout of

[10] *City of Los Angeles, Department of City Planning, Zoning Information File, ZI No. 2452, Transit Priority Areas (TPAs) / Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA, website: http://zimas.lacity.org/, accessed March 2021.*

a 14-story commercial building with a maximum height of 195 feet above grade. Therefore, no impact upon a scenic vista would occur.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. A significant impact may occur if scenic resources would be damaged and/or removed by the development of a project. Implementation of the Project would not damage scenic resources related to a State scenic highway or locally designated scenic highway. The nearest officially designated State scenic highway is the stretch of 210 Freeway east, from La Canada Flintridge to San Bernardino County, starting approximately 11.8 miles north of the Project Site.[11] The nearest eligible State scenic highway is the I-5 Freeway near Tunnel Station to the 134 Freeway, starting approximately 2.7 miles north of the Project Site.[12] Within the City's Mobility Plan, the nearest locally designated scenic highway is Stadium Way before it joins the I-5 Freeway, approximately 2.2 miles northwest of the Project Site.[13] Therefore, the Project Site is not bordered by or within the viewshed of any designated or eligible scenic highway as identified by Caltrans and the City's Mobility Element. Given the location of the nearest eligible and designated State scenic highways, and the location of the nearest locally designated scenic highway in the City's Mobility Plan, and since the Project Site is not included as a designated or eligible State scenic highway or locally designated scenic highway or resource, the Project would not damage any scenic resources, including trees and rock outcroppings.

Regarding historic resources, the Citywide historic resources survey, SurveyLA, shows that the nearest historic building to the Project Site is the National Biscuit Company Building, built in 1925, which is designated as Los Angeles Historic-Cultural Monument No. 888, located 790 feet southwest of the Project Site.[14,15]

The redevelopment of the Development Site for the construction, use, and maintenance of the Project would have no impact upon scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. The Project would not demolish, relocate, or significantly modify or impede any views onto the National Biscuit Company Building property. Therefore, the Project would have no impact upon scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway.

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[11] *List of Eligible and Officially Designated State Scenic Highways Excel Spreadsheet, Caltrans, website: https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways, last updated August 2019. Accessed August 2020.*

[12] *Ibid.*

[13] *City of Los Angeles, Department of City Planning, Mobility Plan 2035: An Element of the General Plan, September 7, 2016.*

[14] *City of Los Angeles, Department of City Planning, SurveyLA Results: Central City North, website: https://planning.lacity.org/preservation-design/survey-la-results-central-city-north, accessed August 2020.*

[15] *City of Los Angeles, Department of City Planning, Office of Historic Resources, Historic Places LA, Los Angeles Historic Resources Inventory, website: http://www.historicplacesla.org/map, accessed August 2020.*

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less Than Significant Impact. A significant impact may occur if the Project were to conflict with applicable zoning and other regulations governing scenic quality (such as theme, style, setbacks, density, massing, etc.) or by being inconsistent with applicable design guidelines.

The Project is located in an industrially zoned area of the City and is surrounded by other industrial, office, commercial, and public facility land uses, such as warehouse buildings directly east of the Project Site; office space along Jesse Street south of the Project Site and along S. Santa Fe Avenue west of the Project Site; the LADWP substation to the immediate north of the Project Site; and commercial (retail, restaurant, café) land uses further northeast, west, and south of the Project Site in the vicinity. The Project would be consistent with these land use types, as it would develop new commercial office space and ground floor commercial uses in an area that is already developed with existing industrial and commercial properties.

The Project is located in Height District No. 1, which does not set a height restriction but does limit development in an M3 zone to an FAR of 1.5:1. With discretionary approval of the Height District Change to increase the FAR limit from 1.5:1 to a proposed 4.5:1, the Project would be constructed at an FAR of 4.3:1, within the increased limit. Additionally, the Central City North Community Plan includes footnote 1, which assigns the Project Site as Height District No. 1, and footnote 6, which states that development exceeding an FAR of 1.5:1 up to 3:1 on properties designated as Height District No.1 may be permitted through a Height District Change procedure, including environmental clearance. As such, the Applicant is requesting a General Plan Amendment to modify footnotes 1 and 6 of the Central City North Community Plan in order to include the boundaries and development of the Project. Therefore, with discretionary approval of the Applicant's requested changes for the Project, development of the Project would not conflict with applicable zoning and land use designations.

Regarding other regulations governing scenic quality, such as theme, style, setbacks, density, massing, and applicable design guidelines, the Project would be developed and designed to conform to the LAMC, the Central City North Community Plan (including Chapter V Urban Design) and other applicable plans and policies that guide development on the Project Site. From an architectural design perspective, the Project would be designed in general conformance with the City of Los Angeles's Commercial Citywide Design Guidelines and the Los Angeles River Design Guidelines, as may be applicable. The Project's consistency with these plans and policies are discussed in further detail under Section XI, Land Use and Planning. Therefore, the Project would comply with the applicable design guidelines. With such compliance, the Project's impacts regarding architectural design would be less than significant. Compliance with the LAMC, the Central City North Community Plan (including Chapter V Urban Design), the Los Angeles River Design Guidelines, and the Commercial Citywide Design Guidelines would ensure that the Project's impacts with regards to aesthetic elements and architectural design would be less than significant.

Building Height and Massing

Regarding building height and massing, the Project Site is currently located in Height District No. 1, which does not set a specific height limit for development for the Project Site but does limit the FAR to 1.5:1. As noted above, the Applicant is seeking a General Plan Amendment and Height District Change from Height District No. 1 to Height District No. 2 to accommodate a maximum FAR of 4.5:1 for the Project. With discretionary approval of the General Plan Amendment and Height District Change, the Project would be constructed at an FAR of 4.3:1, within the maximum limit. Neither the existing nor the proposed Height Districts assign a height limitation for the Project Site. The Project proposes a maximum height of 195 feet above grade and a total of 14 stories above grade.

The Project Site is immediately surrounded by structures that range between one and two stories and the LADWP substation. Warehouse buildings immediately southeast of the Project Site along Mesquit Street range from one- to three-stories. Other commercial and industrial buildings in the area range from one- to three-stories above grade in the surrounding vicinity. In the Project vicinity, one half of a block south on S. Santa Fe Avenue, the recently constructed AMP Lofts (ZA-2013-4075-ZAD-ZV-SPR) is seven-stories above grade. Across and south from the AMP Lofts is the five-story Ford Motor Company Factory building.

One-quarter of a mile northwest of the Project Site, at 520 S. Mateo Street (CPC-2016-3853-GPA-VZC-HD-ZAD-SPR), is the location of a recently approved project for a 35-story mixed-use live/work building with ground floor commercial. Located approximately one-third of a mile south of the Project Site at 2110 Bay Street (CPC-2016-3479-GPA-VZC-HD-SPR) is the location of another recently approved mixed-use live/work development with ground floor commercial that will contain three buildings, the tallest of which will be 11-stories. Approximately one-quarter of a mile south of the Project Site at 2130 E. Violet Street (CPC-2016-1706-VZC-HD-SPR), is a recently approved 9-story mixed-use office and ground floor commercial building. In light of these recently approved projects in the Project vicinity as well as the existing uses in the Project vicinity, the Project's 14-story building would not be out of character with the surrounding Project area's current development, nor out of character with the planned future development of the Project area, and would not lead to a significant impact regarding height.

Regarding massing, the mass and scale of the Project building would be articulated through two types of façade treatments, the use of inset building entrances at the ground level, and balconies on the upper floors. The parking levels would be screened with a combination of solid metal panels and opaque glass mirroring and similar metal and glass façade on the office floors above. The ground floor and office levels (levels 7 through 14) would use alternating panels, windows, and balconies canted at varying angles to enhance building articulation. Materials and patterns would complement the adjacent 640 S. Santa Fe Avenue building and provide continuity with the modern-industrial aesthetic of the Arts District. Additionally, amenity space would be provided as a landscaped roof deck, which would provide views of the Downtown Los Angeles area. The top parking level is proposed to function as a flexible community space from time to time when not in use for parking, such as farmers' markets and flea markets. The proposed building's design, architectural materials, and landscaping would serve to visually break up the Project's massing. The Project would be designed to comply with applicable design guidelines (as discussed above and in Section XI, Land Use and Planning), which would ensure that the Project is visually

compatible with the surrounding land uses. With such compliance, the Project would result in a less than significant impact with regards to massing.

Shade/Shadow

Building shadow is a general condition of the urbanized environment and is considered an aesthetic issue by the City of Los Angeles, which has established shadow impact standards. Facilities and operations sensitive to the effects of shading include: routinely useable outdoor spaces associated with residential, recreational, or institutional (e.g., schools, convalescent homes) land uses; commercial uses such as pedestrian oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; and existing solar collectors. These land uses are termed "shadow-sensitive" because sunlight is important to function, physical comfort, or commerce. A shading impact would normally be considered significant if the Project's structures cast shadows on a shadow sensitive land use for more than three hours each day between the hours of 9:00 A.M. and 3:00 P.M. Pacific Standard Time between late October and early April, or for more than four hours between the hours of 9:00 A.M. and 5:00 P.M. Pacific Daylight Time between early April and late October.

The Project building would reach a maximum of 195 feet above grade at the top of the parapet. The surrounding land uses in the Project vicinity are predominantly office and industrial buildings, the LADWP substation, and mixed-use residential in the vicinity. Based on a review of the surrounding Project area, with the exception of the recently constructed AMP Lofts Building (which is located to the south of the Project Site and would not be affected by Project shadows), the surrounding land uses in the vicinity of the Project Site are not considered sensitive receptors for purposes of determining the Project's shade and shadow impacts. Many of the surrounding land uses in the Project vicinity are predominantly office and industrial buildings. The LA River corridor is located 375 feet to the east of the Project Site. Under the present conditions there are no recreational facilities within this segment of the LA River.[16] Under the proposed LA River Master Plan the planned uses for this segment of the LA River is a trail access along the eastern bank. Based on preliminary shade and shadow diagrams, the Project's shadows would extend to the east bank of the LA River during a limited time of the year during winter months and only after 2:00 p.m. During the summer months, Project shadows would not reach the eastern bank of the LA River until after 5:00 p.m. Therefore, the Project's shade and shadow impacts would be considered less than significant.

The redevelopment of the Development Site for the construction, use, and maintenance of the Project's 14-story building would not conflict with applicable zoning and other regulations governing scenic quality, and therefore would have a less than significant impact with respect to applicable zoning and other regulations governing scenic quality.

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

Less Than Significant Impact. A significant impact may occur if the project introduces new sources of light or glare on or from a project site which would be incompatible with the areas

[16] *County of Los Angeles, 2020 LA River Master Plan PEIR, January 2021 (at Section 3.15 Recreation, Figure 3.15-2.5 - Frame 5 Trails and Access Points).*

surrounding a project site, or which pose a safety hazard to motorists utilizing adjacent streets or freeways. The determination of whether the Project results in a significant nighttime illumination impact shall be made considering the following factors: (a) the change in ambient illumination levels as a result of proposed project sources; and (b) the extent to which proposed project lighting would spill off the project site and affect adjacent light-sensitive areas.

Light

Lighting for the Project would be provided in order to illuminate the building entrances, common open space areas, and parking areas largely to provide adequate nighttime visibility for patrons, guests, and visitors and to provide a measure of security. All exterior lighting would be designed and installed with shielding to reduce glare on neighboring properties. To ensure that lighting sources are not directly visible by adjacent properties, the Project's lighting fixtures would be installed and operated in accordance with Section 99.12.508 – Table A5-602 (Light Pollution Reduction) of the City of Los Angeles Green Building Code, which requires outdoor lighting systems to be designed and installed to comply with the minimum requirements in the California Energy Code, or comply with a local ordinance, whichever is more stringent. The Project would not generate a substantial increase in ambient lighting as the majority of lighting would be directed towards the interior of the Project Site and away from any nearby land uses. Additionally, the Project would comply with the requirements of the River Improvement Overlay ("RIO") Ordinance regarding 3. Exterior Site Lighting.

Illumination already exists in the Project vicinity in the form of streetlights, building lighting, and car headlights along S. Santa Fe Avenue and Mesquit Street. Vehicles entering and exiting the Project Site would not substantially increase light in the Project area. Therefore, lights from vehicles accessing or leaving the Project would not adversely impact surrounding land uses. The Project would not introduce any new sources of substantial light that are incompatible with the surrounding industrial and commercial area. Thus, compliance with the Los Angeles Green Building Code and the RIO Ordinance would ensure that the Project would not generate a substantial increase in ambient lighting, as the majority of the lighting provided would be directed toward the interior of the Project Site and away from nearby land uses. As such, the Project's impacts related to lighting would be less than significant.

Glare

Potential reflective surfaces in the Project vicinity include automobiles traveling and parked on streets, exterior building windows, and surfaces of brightly painted buildings. Excessive glare not only restricts visibility, but also increases the ambient heat reflectivity in a given area. The Project would use different types of façade treatments and screen parking levels with a combination of solid metal panels and opaque glass. Alternating panel angles, windows, and balconies would give the façade a varying appearance and texture. The Project would not introduce any new substantial sources of glare that are incompatible with the surrounding area. Additionally, as discussed above, the Project would not substantially increase light in the Project area that may contribute to glare. The Project is located in a highly urbanized and developed area, and the Project's architectural materials and landscaping would prevent unnecessary glare. The Project's landscaped roof deck and ground floor landscaped open space areas would serve to reduce the

Project's heat gain and reflective glare potential. Therefore, the Project's potential impacts related to glare would be at a less than significant level.

Project Impacts

As previously stated, the Project Site is surrounded by other industrial, office, commercial, and public facility land uses. The Project would be consistent with these land use types by redeveloping the existing surface parking lot on the eastern half of the Project Site into new office space with ground floor commercial space, which would complement the adjacent office and ground floor commercial of the existing 640 S. Santa Fe Avenue building and complement the existing office buildings west and south of the Project Site. Thus, development of the Project would not introduce new sources of light, glare, or nighttime ambient lighting on or from the Project Site which would be incompatible with areas surrounding the Project Site. Additionally, as previously stated, Project compliance with Section 99.12.508 – Table A5-602 (Light Pollution Reduction) of the City of Los Angeles Green Building Code would ensure that lighting sources are not directly visible by adjacent properties. The Project would also comply with the requirements of the River Improvement Overlay ("RIO") Ordinance regarding 3. Exterior Site Lighting. Thus, compliance with the Los Angeles Green Building Code and the RIO Ordinance would ensure that the Project would not generate a substantial increase in ambient lighting.

The redevelopment of the Development Site for the construction, use, and maintenance of the Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Therefore, construction of the Project would have a less than significant impact with respect to day or nighttime views in the area.

Mitigation Measures

Project impacts with regard to aesthetics would be less than significant. Therefore, no mitigation measures are required.

Cumulative Impacts

Less Than Significant Impact. Development of the Project in conjunction with the related projects would result in an intensification of existing land uses within the Central City North Community in the City of Los Angeles. Development of the related projects is expected to occur in accordance with adopted plans and regulations. With respect to the overall visual quality of the surrounding neighborhood, some of the related projects would be subject to site plan review by the Los Angeles Department of City Planning for review and approval, as may be applicable. The site plan review process would ensure each related project is designed and constructed in a manner that is consistent with and compatible with the existing urban form and character of the surrounding environment. Additionally, similar to the Project, all of the related projects are located in a Transit Priority Area and are thus deemed to have less than significant aesthetic and parking impacts per SB 743. Therefore, cumulative aesthetic impacts of the Project would be less than significant.

Mitigation Measures

Cumulative impacts with regard to aesthetics would be less than significant. Therefore, no mitigation measures are required.

II. Agriculture and Forestry Resources

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

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

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

No Impact. The Project Site is located in an urbanized area of the City of Los Angeles. No farmland or agricultural activity exists on the Project Site, nor are there any farmland or agricultural activities in the vicinity of the Project Site. According to the "Los Angeles County Important Farmland 2016" map, which was prepared by the California Department of Conservation, Division of Land Resource Protection, the soils at the Project Site are not candidate for listing as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.[17] The redevelopment of the Development Site for the construction, use, and maintenance of the Project would not convert any farmland or agricultural uses to non-agricultural use, and as such, no impact would occur.

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

No Impact. The Project Site is located within the jurisdiction of the City of Los Angeles and is, therefore, subject to the applicable land use and zoning requirements in the LAMC. The Project Site is zoned M3-1-RIO with a General Plan land use designation of Heavy Manufacturing. The Project Site is not zoned for agricultural production, and the proposed Height District Change to Height District No. 2 would not change that. Further, there is no farmland at the Project Site. In addition, no Williamson Act Contracts are in effect for the Project Site.[18,19] The redevelopment of the Development Site for the construction, use, and maintenance of the Project would not conflict with any agricultural zoning or Williamson Act contract, and as such, no impact would occur.

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

No Impact. The Project Site is zoned M3-1-RIO and has a land use designation of Heavy Manufacturing in the Central City North Community Plan. The Project Site is not zoned as forest land or timberland, and the proposed Height District Change to Height District No. 2 would not change that. Further, there is no timberland production at the Project Site. The redevelopment of the Development Site for the construction, use, and maintenance of the Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland or timberland production, and as such, no impact would occur.

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[17] *State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Maps and Feature Services, DLRP California Important Farmland "most recent", ArcGIS Online Map Viewer, website: http://www.arcgis.com/home/webmap/viewer.html?url=https%3A%2F%2Fgis.conservation.ca.gov%2Fserver%2Frest%2Fservices%2FDLRP%2FCaliforniaImportantFarmland_mostrecent%2FMapServer&source=sd, accessed August 2020.*

[18] *Williamson Act Program, California Division of Land Resource Protection, State of California Williamson Act Contract Land Map 2015-2016, website https://www.dropbox.com/s/ei7sr78xb4cwii2/LA_15_16_WA.pdf?dl=0, accessed August 2020.*

[19] *State of California, Department of Conservation, The Williamson Act Status Report 2016-17, website: https://www.conservation.ca.gov/dlrp/wa/Documents/stats_reports/2018%20WA%20Status%20Report.pdf, accessed August 2020.*

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

No Impact. The Project Site is located in an urbanized area of the City of Los Angeles. No forested lands or natural vegetation exists on or in the vicinity of the Project Site. As such, development of the Project would not result in the loss of forest land or convert forest land to non-forest uses. The redevelopment of the Development Site for the construction, use, and maintenance of the Project would not result in the loss of forest land or convert forest land to non-forest uses. As such, no impact would occur.

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

No Impact. Neither the Project Site nor nearby properties are currently utilized for agricultural or forestry uses. As discussed above, the Project Site is not classified in any "Farmland" category designated by the State of California. According to the "Los Angeles County Important Farmland 2016" map, which was prepared by the California Department of Conservation, Division of Land Resource Protection, the soils at the Project Site are not candidates for listing as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The redevelopment of the Development Site for the construction, use, and maintenance of the Project would not result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use. As such, no impact would occur.

Mitigation Measures

Project impacts with regard to agricultural and forestry resources would be less than significant. Therefore, no mitigation measures are required.

Cumulative Impacts

No Impact. Development of the Approved Project and Project in combination with the related projects would not result in the conversion of State-designated agricultural land from agricultural use to a non-agricultural use, nor result in the loss of any forest land or conversion of forest land to non-forest use. The Los Angeles County Important Farmland 2016 Map and The Williamson Act Status Report 2016-17 maintained by the California Division of Land Resource Protection indicates that the Project Site and the surrounding area are not included in the Important Farmland category. The Project Site is located in an urbanized area in the Central City North Community within the City of Los Angeles and does not include any State-designated agricultural lands or forest or timberland uses. Therefore, no cumulative impact would occur.

Mitigation Measures

Cumulative impacts with regard to agricultural and forestry resources would be less than significant. Therefore, no mitigation measures are required.

III. Air Quality

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

a) Conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. A significant air quality impact could occur if a project is not consistent with the applicable Air Quality Management Plan ("AQMP") or would obstruct implementation of the policies or obtaining the goals of that plan. The most recent AQMP was adopted by the Governing Board of the South Coast Air Quality Management District ("SCAQMD") on March 3, 2017 ("2016 AQMP"). The 2016 AQMP represents a thorough analysis of existing and potential regulatory control options, includes available, proven, and cost-effective strategies, and seeks to achieve multiple goals in partnership with other entities promoting reductions in greenhouse gasses and toxic risk, as well as efficiencies in energy use, transportation, and goods movement. The following analysis evaluates two criteria for determining consistency with the applicable AQMP:

1) Would the Project increase the frequency or severity of existing air quality violations, cause or contribute to new air quality violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMD?;

2) Would the Project exceed the assumptions utilized in preparing the AQMP?

Criterion 1

Would the Project increase the frequency or severity of existing air quality violations, cause or contribute to new air quality violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMD?

Criteria Pollutants

The six principal pollutants for which national and state criteria and standards have been promulgated, known as "criteria pollutants", and which are most relevant to current air quality planning and regulation in the Air Basin include: ozone (O_3), respirable and fine particulate matter (PM_{10} and $PM_{2.5}$, respectively), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and lead (Pb). These pollutants are referred to as "criteria air pollutants" as a result of the specific standards, or criteria, which have been adopted for them.

Ozone (O_3)

O_3 is a gas that is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO_X) – both byproducts of internal combustion engine exhaust – undergo slow photochemical reactions in the presence of sunlight. O_3 concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable. An elevated level of O_3 irritates the lungs and breathing passages, causing coughing and pain in the chest and throat, thereby increasing susceptibility to respiratory infections and reducing the ability to exercise. Effects are more severe in people with asthma and other respiratory ailments. Long-term exposure may lead to scarring of lung tissue and may lower lung efficiency.

Particulate Matter (PM_{10} and $PM_{2.5}$)

Particulate matter pollution consists of very small liquid and solid particles floating in the air, which can include smoke, soot, dust, salts, acids, and metals. Particulate matter can form when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. Respirable and fine particulate matter, PM_{10} and $PM_{2.5}$, consist of extremely small, suspended particles or droplets 10 microns and 2.5 microns or smaller in diameter, respectively. Some sources of particulate matter, like pollen and windstorms, are naturally occurring. However, in areas like the City of Los Angeles, most particulate matter is caused by road dust, diesel soot, combustion products, abrasion of tires and brakes, and construction activities. The human body naturally prevents the entry of larger particles into the body. However, small particles can enter the body and become trapped in the nose, throat, and upper respiratory tract. These small particulates can potentially aggravate existing heart and lung diseases, change the body's defenses against inhaled materials, and damage lung tissue. The elderly, children, and those with chronic lung or heart disease are most sensitive to PM_{10} and $PM_{2.5}$. Lung impairment can persist for two to three weeks after exposure to high levels of particulate matter. Some types of particulates can become toxic after inhalation due to the presence of certain chemicals and their reaction with internal body fluids.

Carbon Monoxide (CO)

CO is a colorless, odorless gas primarily emitted from combustion processes and motor vehicles due to incomplete combustion of carbon-containing fuels such as gasoline or wood. In urban areas, such as the City of Los Angeles, automobile exhaust accounts for the majority of CO emissions. CO concentrations tend to be the highest during the winter morning, when little to no wind and surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines, unlike O_3, motor vehicles operating at slow speeds are the primary source of CO in the Air Basin. The highest ambient CO concentrations are generally found near congested transportation corridors and intersections. Elevated concentrations of CO weaken the heart's contractions and lower the amount of oxygen carried by the blood. It is especially dangerous for people with chronic heart disease. Inhalation of CO can cause nausea, dizziness, and headaches at moderate concentrations and can be fatal at high concentrations.

Nitrogen Dioxide (NO_2)

Nitrogen dioxide is a nitrogen oxide compound that is produced by the combustion of fossil fuels, such as in internal combustion engines (both gasoline and diesel powered), as well as point sources, especially power plants. Of the seven types of NO_X compounds, NO_2 is the most abundant in the atmosphere. As ambient concentrations of NO_2 are related to traffic density, commuters in heavy traffic areas, such as urban areas like the City of Los Angeles, may be exposed to higher concentrations of NO_2 than those indicated by regional monitors. NO_2 absorbs blue light and results in a brownish-red cast to the atmosphere and reduced visibility. NO_2 also contributes to the formation of PM_{10}. Nitrogen oxides irritate the nose and throat, and increase one's susceptibility to respiratory infections, especially in people with asthma. The principal concern of NO_X is as a precursor to the formation of O_3.

Sulfur Dioxide (SO_2)

Sulfur oxides (SO_X) are compounds of sulfur and oxygen molecules. SO_2 is the predominant form found in the lower atmosphere and is a product of burning sulfur or burning materials that contain sulfur. Major sources of SO_2 include power plants, large industrial facilities, diesel vehicles, and oil-burning residential heaters. Generally, the highest levels of SO_2 are found near large industrial complexes. In recent years, SO_2 concentrations have been reduced by the increasingly stringent controls placed on stationary source emissions of SO_2 and limits on the sulfur content of fuels. Emissions of SO_2 aggravate lung diseases, especially bronchitis. It also constricts the breathing passages, especially in asthmatics and people involved in moderate to heavy exercise. SO_2 potentially causes wheezing, shortness of breath, and coughing. High levels of particulates appear to worsen the effect of SO_2, and long-term exposures to both pollutants leads to higher rates of respiratory illness.

Lead (Pb)

Lead is a metal found naturally in the environment as well as in manufactured products. The highest levels of lead in air are usually found near lead smelters. The major sources of lead emissions to the air are ore and metals processing and piston-engine aircraft operating on leaded aviation gasoline. Lead is also emitted from the sanding or removal of old lead-based paint. Lead emissions are primarily a regional pollutant. Lead affects the brain and other parts of the body's

nervous system. Exposure to lead in very young children impairs the development of the nervous system, kidneys, and blood forming processes in the body.

Additional Criteria Pollutants (California Only)

In addition to the national standards, the State of California regulates State-identified criteria pollutants, including sulfates, hydrogen sulfide, visibility-reducing particles, and vinyl chloride. With respect to the State-identified criteria pollutants, most land use development projects either do not emit them (i.e., hydrogen sulfide (nuisance odor) and vinyl chloride), or otherwise account for these pollutants (i.e., sulfates and visibility reducing particles) through other criteria pollutants. For example, sulfates are associated with SO_X emissions, and visibility-reducing particles are associated with particulate matter emissions. A description of the health effects of the State-identified criteria air pollutants is provided below.

Sulfates (SO_4^{2-})

Sulfates are the fully oxidized ionic form of sulfur. Sulfates occur in combination with metal and/or hydrogen ions. In California, emissions of sulfur compounds occur primarily from the combustion of petroleum-derived fuels (e.g., gasoline and diesel fuel) that contain sulfur. This sulfur is oxidized during the combustion process and subsequently converted to sulfate compounds in the atmosphere. Effects of sulfate exposure at levels above the standard include a decrease in ventilatory function, aggravation of asthmatic symptoms, and an increased risk of cardio-pulmonary disease. Sulfates are particularly effective in degrading visibility, and, due to the fact that they are usually acidic, can harm ecosystems and damage materials and property.

Hydrogen Sulfide (H_2S)

H_2S is a colorless gas with the odor of rotten eggs. The most common sources of H_2S emissions are oil and natural gas extraction and processing, and natural emissions from geothermal fields. Industrial sources of H_2S include petrochemical plants and kraft paper mills. H_2S is also formed during bacterial decomposition of human and animal wastes, and is present in emissions from sewage treatment facilities and landfills.[20] Exposure to H_2S can induce tearing of the eyes and symptoms related to overstimulation of the sense of smell, including headache, nausea, or vomiting; additional health effects of eye irritation have only been reported with exposures greater than 50 parts per million (ppm), which is considerably higher than the odor threshold.[21] H_2S is regulated as a nuisance based on its odor detection level; if the standard were based on adverse health effects, it would be set at a much higher level.[22]

Volatile Organic Compounds (VOCs) and Toxic Air Contaminants (TACs)

Although the SCAQMD's primary mandate is attaining the NAAQS and the CAAQS for criteria pollutants within the district, SCAQMD also has a general responsibility to control emissions of air contaminants and prevent endangerment to public health. As a result, the SCAQMD has

[20] *California Air Resources Board, Hydrogen Sulfide & Health, https://ww2.arb.ca.gov/resources/hydrogen-sulfide-and-health. Accessed February 2021.*

[21] *California Air Resources Board, Hydrogen Sulfide & Health.*

[22] *California Air Resources Board, Hydrogen Sulfide & Health.*

regulated pollutants other than criteria pollutants such as VOCs, TACs, greenhouse gases, and stratospheric ozone-depleting compounds.

Volatile Organic Compounds (VOCs)

VOCs are organic chemical compounds of carbon and are not "criteria" pollutants themselves; however, VOCs are a prime component (along with NO_X) of the photochemical processes by which such criteria pollutants as O_3, nitrogen dioxide, and certain fine particles are formed. They are therefore regulated as "precursors" to formation of these criteria pollutants. Some are also identified as TACs and have adverse health effects. VOCs are typically formed from combustion of fuels and/or released through evaporation of organic liquids, internal combustion associated with motor vehicle usage, and consumer products (e.g., architectural coatings, etc.).

Toxic Air Contaminants (TACs)

TACs is a term used to describe airborne pollutants that may be expected to result in an increase in mortality or serious illness or which may pose a present or potential hazard to human health, and include both carcinogens and non-carcinogens. The California Air Resources Board (CARB) and the California Office of Environmental Health Hazard Assessment (OEHHA) determine if a substance should be formally identified, or "listed," as a TAC in California. CARB has listed approximately 200 toxic substances, including those identified by the USEPA, which are identified on the California Air Toxics Program's TAC List. TACs are also not classified as "criteria" air pollutants. The greatest potential for TAC emissions during construction is related to diesel particulate matter (DPM) emissions associated with heavy-duty equipment. During long-term operations, sources of DPM may include heavy duty diesel-fueled delivery trucks and stationary emergency generators. The effects of TACs can be diverse and their health impacts tend to be local rather than regional; consequently, ambient air quality standards for these pollutants have not been established, and analysis of health effects is instead based on cancer risk and exposure levels.

Ambient Air Quality Standards

Federal Clean Air Act

The Federal Clean Air Act (CAA) is the comprehensive federal law that regulates air emissions in order to protect public health and welfare.[23] The USEPA is responsible for the implementation and enforcement of the CAA, which establishes federal NAAQS, specifies future dates for achieving compliance, and requires the USEPA to designate areas as attainment, nonattainment, or maintenance. The CAA also mandates that each state submit and implement a State Implementation Plan (SIP) for each criteria pollutant for which the state has not achieved the applicable NAAQS. The SIP includes pollution control measures that demonstrate how the standards for those pollutants will be met. The sections of the CAA most applicable to land use

[23] *United States Environmental Protection Agency, Summary of the Clean Air Act, https://www.epa.gov/laws-regulations/summary-clean-air-act, last updated August 6, 2020. Accessed February 2021.*

development projects include Title I (Nonattainment Provisions) and Title II (Mobile Source Provisions).[24]

Title I requirements are implemented for the purpose of attaining NAAQS for criteria air pollutants. Table 4.1, Ambient Air Quality Standards, below, shows the NAAQS currently in effect for each criteria pollutant. The Air Basin fails to meet national standards for O_3 and $PM_{2.5}$ and, therefore, is considered a federal "non-attainment" area for these pollutants.

Title II pertains to mobile sources, which includes on-road vehicles (e.g. cars, buses, motorcycles) and non-road vehicles (e.g. aircraft, trains, construction equipment). Reformulated gasoline and automobile pollution control devices are examples of the mechanisms the USEPA uses to regulate mobile air emission sources. The provisions of Title II have resulted in tailpipe emission standards for vehicles, which have been strengthened in recent years to improve air quality. For example, the standards for NO_X emissions have been lowered substantially and the specification requirements for cleaner burning gasoline are more stringent.

The NAAQS, and the CAAQS for the California criteria air pollutants (discussed below), have been set at levels considered safe to protect public health, including the health of sensitive populations and to protect public welfare.

California Clean Air Act

The California Clean Air Act (CCAA), signed into law in 1988, requires all areas of the state to achieve and maintain the California Ambient Air Quality Standards (CAAQS) by the earliest practicable date. CARB, a part of the California Environmental Protection Agency (CalEPA), is responsible for the coordination and administration of both state and federal air pollution control programs within California. In this capacity, CARB conducts research, sets the CAAQS, compiles emission inventories, develops suggested control measures, and provides oversight of local programs. CARB establishes emissions standards for motor vehicles sold in California, consumer products, and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions. Table 4.1 includes the CAAQS currently in effect for each of the criteria pollutants, as well as other pollutants recognized by the state. As shown in Table 4.1, the CAAQS include more stringent standards than the NAAQS. The Air Basin fails to meet state standards for O_3, PM_{10}, and $PM_{2.5}$ and, therefore, is considered "non-attainment" for these pollutants.

[24] *United States Environmental Protection Agency, Clean Air Act Overview, Clean Air Act Table of Contents by Title, Last Updated January 3, 2017, https://www.epa.gov/clean-air-act-overview/clean-air-act-text. Accessed February 2021. As shown therein, Title I addresses nonattainment areas and Title II addresses mobile sources.*

Table 4.1
Ambient Air Quality Standards

Pollutant	Averaging Period	Federal Standard [a,b]	California Standard [a,b]	South Coast Air Basin Attainment Status [c]	
				Federal Standard [d]	California Standard [d]
Ozone (O_3)	1-hour	—	0.09 ppm (180 µg/m^3)	—	Non-Attainment
	8-hour	0.070 ppm (137 µg/m^3)	0.07 ppm (137 µg/m^3)	Non-Attainment (Extreme)	Non-Attainment
Respirable Particulate Matter (PM_{10})	24-hour	150 µg/m^3	50 µg/m^3	Attainment	Non-Attainment
	Annual	—	20 µg/m^3		
Fine Particulate Matter ($PM_{2.5}$)	24-hour	35 µg/m^3	—	Non-Attainment (Serious)	Non-Attainment
	Annual	12 µg/m^3	12 µg/m^3		
Carbon Monoxide (CO)	1-hour	35 ppm (40 mg/m^3)	20 ppm (23 mg/m^3)	Attainment	Attainment
	8-hour	9 ppm (10 mg/m^3)	9.0 ppm (10 mg/m^3)		
Nitrogen Dioxide (NO_2)	1-hour	0.10 ppm (188 µg/m^3)	0.18 ppm (339 µg/m^3)	Unclassified/ Attainment	Attainment
	Annual	0.053 ppm (100 µg/m^3)	0.030 ppm (57 µg/m^3)		
Sulfur Dioxide (SO_2)	1-hour	0.075 ppm (196 µg/m^3)	0.25 ppm (655 µg/m^3)	Unclassified/ Attainment	Attainment
	3-hour	0.5 ppm (1,300 µg/m^3)	—		
	24-hour	0.14 ppm (365 µg/m^3)	0.04 ppm (105 µg/m^3)		
	Annual	0.03 ppm (80 µg/m^3)	—		
Lead (Pb)	30-day average	—	1.5 µg/m^3	Partial Non-Attainment [e]	Attainment
	Rolling 3-month average	0.15 µg/m^3	—		
Sulfates	24-hour	—	25 µg/m^3	—	Attainment
Hydrogen Sulfide (H2S)	1-hour	—	0.03 ppm (42 µg/m^3)	—	Unclassified

Pollutant	Averaging Period	Federal Standard [a,b]	California Standard [a,b]	South Coast Air Basin Attainment Status [c]	
				Federal Standard [d]	California Standard [d]

Notes: ppm = parts per million by volume; µg/m3 = micrograms per cubic meter

[a] *An ambient air quality standard is a concentration level expressed in either parts per million or micrograms per cubic meter and averaged over a specific time period (e.g., 1 hour). The different averaging times and concentrations are meant to protect against different exposure effects. Some ambient air quality standards are expressed as a concentration that is not to be exceeded. Others are expressed as a concentration that is not to be equaled or exceeded.*

[b] *Ambient Air Quality Standards based on the 2016 AQMP.*

[c] *"Attainment" means that the regulatory agency has determined based on established criteria, that the Air Basin meets the identified standard. "Non-attainment" means that the regulatory agency has determined that the Air Basin does not meet the standard. "Unclassified" means there is insufficient data to designate an area, or designations have yet to be made.*

[d] *California and Federal standard attainment status based on SCAQMD's 2016 AQMP and 2018 updates from CARB. https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations.*

[e] *An attainment re-designation request is pending.*

Sources: U.S.EPA, NAAQS Table, CARB, Ambient Air Quality Standards May 4, 2016, Accessed January 2021.

Existing Air Quality

The SCAQMD divides the Basin into 38 source receptor areas (SRAs) in which 38 monitoring stations operate to monitor the various concentrations of air pollutants in the region. The Project Site is located within SRA 1, which covers the Central Los Angeles area. SCAQMD Station No. 087 collects ambient air quality data for SRA 1. This station is Located at 1630 North Main Street in Los Angeles and is located approximately 2 miles north of the Project Site. This station currently monitors emission levels of O_3, CO, NO_2, SO_2, PM_{10}, $PM_{2.5}$, and Pb. Table 4.2, Summary of Ambient Air Quality in the Central Los Angeles Area, below, identifies the national and state ambient air quality standards for the relevant air pollutants, along with the ambient pollutant concentrations that were measured at the SCAQMD Station No. 087 from 2016 to 2019.[25]

According to the air quality data shown in Table 4.2, the state one-hour ozone standard was exceeded in the Central Los Angeles area for two days in 2016, six days in 2017, two days in 2018, and zero days in 2019. The national and state eight-hour ozone standard was exceeded four days in 2016, 14 days in 2017, four days in 2018, and two days in 2019. The federal 24-hour PM_{10} standard has not been exceeded from 2016 through 2019, while the state 24-hour PM_{10} standard was exceeded 18 days in 2016, 41 days in 2017, 31 days in 2018, and 3 days in 2019. In addition, the state annual average standard for PM_{10} was exceeded each year from 2015 to 2018. The national 24-hour $PM_{2.5}$ standard was exceeded for seven days in 2015, two days in 2016, five days in 2017, and three days in 2018. The national and state annual average standards for $PM_{2.5}$ were exceeded in 2018. Furthermore, neither national nor state standards for SO_2, CO, Lead (Pb), or NO_2 have been exceeded from 2016 to 2019. CO levels in the Project area are substantially below the federal and state standards. The maximum CO levels during the past four

[25] *Data for 2020 has not yet been published on the Air Quality Management District's website.*

years shown in Table 4.2 are 2.0 ppm (one-hour average) and 1.7 ppm (eight-hour average), compared to the thresholds of 20 ppm (one-hour average) and 9.0 (eight-hour average).

Table 4.2
Summary of Ambient Air Quality in the Central Los Angeles Area

Air Pollutants Monitored Within SRA 1 Central Los Angeles Area	Year			
	2016	2017	2018	2019
O_3				
Maximum 1-hour concentration measured	0.103 ppm	0.116 ppm	0.098 ppm	0.085 ppm
Number of days exceeding State 0.09 ppm 1-hour standard	2	6	2	0
Maximum 8-hour concentration measured	0.078 ppm	0.086 ppm	0.073 ppm	0.080 ppm
Number of days exceeding national 0.070 ppm 8-hour standard	4	14	4	2
Number of days exceeding State 0.07 ppm 8-hour standard	4	14	4	2
CO				
Maximum 1-hour concentration measured	1.9 ppm	1.9 ppm	2.0 ppm	2.0 ppm
Number of days exceeding federal or State 1-hour standards	0	0	0	0
Maximum 8-hour concentration measured	1.4 ppm	1.6 ppm	1.7 ppm	1.6 ppm
Number of days exceeding federal or State 8-hour standards	0	0	0	0
NO_2				
Maximum 1-hour concentration measured	0.0647 ppm	0.0806 ppm	0.0701 ppm	0.0697 ppm
Annual average	0.0208 ppm	0.0205 ppm	0.0185 ppm	0.0177 ppm
Does measured annual average exceed national 0.0534 ppm annual average standard?	No	No	No	No
Does measured annual average exceed State 0.030 ppm annual average standard?	No	No	No	No
PM_{10}				
Maximum 24-hour concentration measured	67 µg/m^3	96 µg/m^3	81 µg/m^3	62 µg/m^3
Number of days exceeding national 150 µg/m^3 24-hour standard	0	0	0	0
Number of days exceeding State 50 µg/m^3 24-hour standard	18	41	31	3
Annual Average Concentration (Annual Arithmetic Mean (AAM))	32.4 µg/m^3	34.4 µg/m^3	34.1 µg/m^3	25.5 µg/m^3
Does measured AAM exceed State 20 µg/m^3 AAM standard?	Yes	Yes	Yes	Yes
$PM_{2.5}$				
Maximum 24-hour concentration measured	44.4 µg/m^3	49.2 µg/m^3	43.80 µg/m^3	43.50 µg/m^3
Number of days exceeding national 35.0 µg/m^3 24-hour standard	2	5	3	1
Annual Arithmetic Mean (AAM)	11.83 µg/m^3	11.94 µg/m^3	12.58 µg/m^3	10.85 µg/m^3
Does measured AAM exceed national 12 µg/m^3 AAM standard?	No	No	Yes	No
Does measured AAM exceed State 12 µg/m^3 AAM standard?	No	No	Yes	No
SO_2				
Maximum 1-hour concentration measured	0.0134 ppm	0.0057 ppm	0.0179 ppm	0.010 ppm
Does measured 1-hour concentration exceed federal 0.075 ppm 1-hour standard or state 0.25 ppm standard?	No	No	No	No
99th Percentile Concentration (1 hour)	0.0025 ppm	0.0026 ppm	0.0028 ppm	0.0023 ppm
Pb				
Maximum monthly average concentration measured	0.016 µg/m^3	0.017 µg/m^3	0.11 µg/m^3	0.12 µg/m^3
Does measured average exceed State 1.5 µg/m^3 standard?	No	No	No	No
Maximum 3-month rolling averages	0.01 µg/m^3	0.01 µg/m^3	0.011 µg/m^3	0.010 µg/m^3
Does measured average exceed federal 0.15 µg/m^3 standard?	No	No	No	No

Note: ppm = parts by volume per million molecules of air, µg/m^3=micrograms per cubic meter
Source: SCAQMD, Historical Data by Year, accessed March 2021.

Existing Project Site Emissions

The Project Site is currently developed with a four-story, 107,224 square-foot office and ground floor commercial building with two levels of subterranean parking and surface parking. The emissions generated by the 640 S. Santa Fe Avenue building are quantified in Table 4.3 below and are anticipated to occur in the future with or without the Project. The Development Site is currently improved with a surface parking lot serving the 640 S. Santa Fe Avenue building. There are no structures or land uses within the Development Site that generate air emissions.[26]

Table 4.3
Existing Daily Operational Emissions from the Project Site

Emissions Source	Emissions in Pounds per Day					
	ROG [a]	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Area Source	2.44	<0.01	0.03	0.00	<0.01	<0.01
Energy	0.07	0.64	0.54	<0.01	0.05	0.05
Mobile (Vehicles)	2.29	11.44	28.33	0.10	8.02	2.20
Stationary Sources	0.82	3.67	2.09	<0.01	0.12	0.12
Total Emissions	***5.62***	***15.75***	***30.99***	***0.11***	***8.19***	***2.37***

[a] As noted in the CalEEMod User Guide, both VOC and ROGs are precursors to ozone so they are summed in the CalEEMod report under the header ROG. For the purposes of comparing the ROG value to a VOC significance threshold, the terms can be used interchangeably.
Calculation data are provided in Appendix A to this MND.
Source: Parker Environmental Consultants, 2021.

Thresholds of Significance

To assist in answering the Appendix G Threshold questions, the City of Los Angeles utilizes SCAQMD's CEQA Air Quality Handbook. Table 4.4, SCAQMD Air Quality Significance Thresholds, below, identifies the currently recommended supplemental thresholds by SCAQMD as published in the CEQA Air Quality Handbook. Based on the criteria set forth in SCAQMD's CEQA Air Quality Handbook, the Project may have a significant impact with regard to construction emissions if any of the following would occur:

- Regional emissions from both direct and indirect sources would exceed any of the SCAQMD prescribed threshold levels identified in Table 4.4, below.

- Maximum on-site daily localized emissions exceed the Localized Significance Thresholds (LST), resulting in predicted ambient concentrations in the vicinity of the Project Site greater than the most stringent ambient air quality standards for CO (20 ppm [23,000 µg/m^3] over a 1-hour period or 9.0 ppm [10,350 µg/m^3] averaged over an 8-hour period) and NO_2 (0.18 ppm [338.4 µg/m^3] over a 1-hour period, 0.1 ppm [188 µg/m^3] over a three-

[26] *The emissions generated by vehicle trips of vehicles parked within the surface parking lot are generated by the land uses within the 640 S. Santa Fe building and are not generated by the surface parking lot. Thus, it is assumed that the surface parking lot is not generating any air quality emissions.*

Table 4.4
SCAQMD Air Quality Significance Thresholds

Mass Daily Thresholds		
Pollutant	**Construction**	**Operation**
Nox	100 pounds/day	55 pounds/day
VOC	75 pounds/day	55 pounds/day
PM_{10}	150 pounds/day	150 pounds/day
$PM_{2.5}$	55 pounds/day	55 pounds/day
SO_x	150 pounds/day	150 pounds/day
CO	550 pounds/day	550 pounds/day
Pb [c]	3 pounds/day	3 pounds/day
Toxic Air Contaminants and Odor Thresholds		
TACs (including carcinogens and non-carcinogens)	Maximum Incremental Cancer Risk ≥ 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million) Hazard Index ≥ 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	
Ambient Air Quality for Criteria Pollutants [a]		
NO_2 1-hour average annual arithmetic mean	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.18 ppm (state) 0.03 ppm (state) and 0.534 ppm (federal)	
PM_{10} 24-hour average annual average	10.4 µg/m^3 (construction)[b] & 2.5 µg/m^3 (operation) 1.0 µg/m^3	
$PM_{2.5}$ 24-hour average	10.4 µg/m^3 (construction)[b] & 2.5 µg/m^3 (operation)	
SO_2 1-hour average 24-hour average	0.25 ppm (state) & 0.075 ppm federal – (99^{th} percentile) 0.04 µg/m^3 (state)	
Sulfate 24-hour average	25 µg/m^3 (state)	
CO 1-hour average 8-hour average	SCAQMD is in attainment; project is significant if it causes or Contributes to an exceedance of the following attainment standards: 20 ppm (state) and 35 ppm (federal) 9.0 ppm (state/federal)	
Lead 30-day Average Rolling 3-Month Average	1.5 µg/m^3 (state) 0.15 µg/m^3 (federal)	

Notes: ppm = parts per million by volume; µg/m^3 = micrograms per cubic meter

[a] *Ambient air quality thresholds for criteria pollutants based on SCQMD Rule 1303, Table A-2 unless otherwise stated.*

[b] *Ambient air quality threshold based on SCAQMD Rule 403.*

[c] *While the South Coast Air Quality Management District CEQA Air Quality Handbook contains significance thresholds for lead, Project construction and operation would not include sources of lead emissions and would not exceed the significance thresholds for lead. Unleaded fuel and unleaded paints have virtually eliminated lead emissions from commercial land use projects such as the Project. As a result, lead emissions are not further evaluated in this MND.*

Source: SCAQMD, Air Quality Significance Thresholds, Revision April 2019.

year average of the 98th percentile of the daily maximum 1-hour average, or 0.03 ppm [56.4 µg/m^3] averaged over an annual period).

- Maximum on-site localized PM_{10} or $PM_{2.5}$ emissions during construction exceed the applicable LSTs, resulting in predicted ambient concentrations in the vicinity of the Project Site to exceed the incremental 24-hr threshold of 10.4 µg/m^3 or 1.0 µg/m^3 PM_{10} averaged over an annual period.

Operational Impacts

The L.A. CEQA Thresholds Guide identifies the following factors and considerations to evaluate operational air quality impacts:

- Operational emissions exceed the SCAQMD thresholds shown in Table 4.4, above;
- Either of the following conditions would occur at an intersection or roadway within one-quarter mile of a sensitive receptor:
    - The Project causes or contributes to an exceedance of the California 1-hour or 8-hour CO standards of 20 or 9.0 ppm, respectively; or
    - The incremental increase due to the project is equal to or greater than 1.0 ppm for the California 1-hour CO standard, or 0.45 ppm for the 8-hour CO standard.
- The project creates an objectionable odor at the nearest sensitive receptor.

Additionally, based on the criteria set forth in SCAQMD's CEQA Air Quality Handbook, a project may have a significant impact with regard to operational emissions if any of the following would occur:

- Maximum on-site daily localized emissions exceed the LST, resulting in predicted ambient concentrations in the vicinity of the Project Site greater than the most stringent ambient air quality standards for CO (20 ppm over a 1-hour period or 9.0 ppm averaged over an 8-hour period) and NO_2 (0.18 ppm over a 1-hour period, 0.1 ppm over a 3-year average of the 98th percentile of the daily maximum 1-hour average, or 0.03 ppm averaged over an annual period).

- Maximum on-site localized operational PM_{10} and $PM_{2.5}$ emissions exceed the incremental 24-hr threshold of 2.5 µg/m^3 or 1.0 µg/m^3 PM_{10} averaged over an annual period.[27]

(1) Toxic Air Contaminants

In accordance with the L.A. CEQA Thresholds Guide, the determination of significance related to toxic air contaminants shall be made on a case-by-case basis, considering the following factors:

(a) The regulatory framework for the toxic material(s) and process(es) involved;

(b) The proximity of the toxic air contaminants to sensitive receptors;

(c) The quantity, volume and toxicity of the contaminants expected to be emitted;

(d) The likelihood and potential level of exposure; and

(e) The degree to which project design will reduce the risk of exposure.

Based on criteria set forth by the SCAQMD,[28] a project would expose sensitive receptors to substantial concentrations of toxic air contaminants if any of the following would occur:

- The project results in the exposure of sensitive receptors to carcinogenic or toxic air contaminants that exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0.[29] For projects with a maximum incremental cancer risk between 1 in one million and 10 in one million, a project would result in a significant impact if the cancer burden exceeds 0.5 excess cancer cases.

(2) Consistency with the Applicable General Plan and AQMP Policies

Section 15125(d) of the State CEQA Guidelines requires an analysis of project consistency with applicable general plan, specific plan, and regional plans, including but not limited to the applicable air quality attainment or maintenance plan, or State Implementation Plan. As discussed further below, this analysis evaluates consistency with the Air Quality Element of the City's General Plan, regional plans and the 2016 AQMP in accordance with SCAQMD's CEQA Air Quality Handbook.

Project Impacts

For purposes of estimating the Project's air quality impacts, the Project's construction and operational air quality emissions were quantified using the California Emissions Estimator Model

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[27] *SCAQMD, Final-Methodology to Calculate Particulate Matter (PM) 2.5 and PM 2.5 Significance Thresholds, October 2006.*

[28] *SCAQMD, CEQA Air Quality Handbook, Chapter 6 (Determining the Air Quality Significance of a project) and Chapter 10 (Assessing Toxic Air Pollutants), April 1993.*

[29] *The hazard index is the ratio of a toxic air contaminant's concentration divided by its Reference Concentration, or safe exposure level. If the hazard index exceeds one, people are exposed to levels of TACs that may pose noncancer health risks.*

(CalEEMod 2016.3.2) and compared to the SCAQMD's construction and operational thresholds of significance.

Construction Impacts

Construction of the Project has the potential to generate temporary pollutant emissions through the use of heavy-duty construction equipment, such as excavators and cranes, and through vehicle trips generated from workers and haul and delivery trucks traveling to and from the Project Site. In addition, fugitive dust emissions would result from excavation and soil-handling activities. Mobile source emissions, primarily NO_X, would result from the use of construction equipment. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of construction activity, and prevailing weather conditions.

As discussed in greater detail in Section 3, Project Description, the construction activities for the Project would occur over an approximately 24 month period, with final buildout occurring in 2025. Construction activities associated with the Project would be undertaken in four main steps: (1) demolition and site clearing; (2) grading, excavation, and foundations; (3) building construction; and (4) finishing and architectural coatings. It is assumed that all construction activities would be performed in accordance with all applicable State and federal laws and City Codes and policies with respect to building construction and activities. For purposes of the modeling analysis for the Project, the following primary assumptions were made:

- Demolition and site preparation would include removing the asphalt surface parking lot within the Development Site resulting in the removal of three tons of asphalt generating approximately 40 haul trips (20 inbound and 20 outbound). The demolition and site-clearing phase would be completed in approximately one month.

- Excavation of the two level subterranean parking garage and building foundations would extend approximately 32 feet below grade generating approximately 31,500 cubic yards (cy) of soil export. Assuming a haul truck capacity of 14 cubic yards of soil per truck, soil export activities would generate approximately 4,500 haul trips (2,250 inbound trips and 2,250 outbound trips). The excavation and soil export phase would occur over an approximate three month timeframe.

- The building construction phase, involving the construction of 188,954 square feet of buildable floor area plus a 397 space parking garage, is expected to occur for approximately 16 months.

- The finishing/architectural coating phase is expected to occur over approximately four months. During this phase, interior cabinets and lighting fixtures would be installed, interior and exterior wall finishing and paint would be applied, and the installation of windows, doors, and cabinetry would take place.

In addition to the above assumptions, the air quality modeling analysis incorporates the following regulatory compliance measures as being applicable to the Project's construction activities:

- Compliance with provisions of the SCAQMD District Rule 403. The Project shall comply

with all applicable standards of the Southern California Air Quality Management District, including the following provisions of District Rule 403:

  - All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.
  - The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.
  - All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 25 mph), so as to prevent excessive amounts of dust.
  - All dirt/soil loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.
  - All dirt/soil materials transported off-site shall be either sufficiently watered or securely covered to prevent an excessive amount of dust.
  - General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.
  - Trucks having no current hauling activity shall not idle but be turned off.

- In accordance with Sections 2485 in Title 13 of the California Code of Regulations, the idling of all diesel fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location.
- In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards.
- The Project shall comply with SCAQMD Rule 1113 limiting the volatile organic compound content of architectural coatings.

The Project includes the demolition of the existing surface parking lot on the eastern portion of the Project Site and the new construction of a 14-story commercial building with 188,954 square feet of floor area and two levels of below grade parking. Table 4.5, Project Peak Daily Regional Construction Emissions, identifies the daily emissions that are estimated to occur on peak construction days for each phase of the Project construction. As shown in Table 4.5, emissions of all six criteria pollutants would be below the SCAQMD's mass daily significance thresholds. As such, the Project's construction air quality emission impacts would be less than significant.

Table 4.5
Project Peak Daily Regional Construction Emissions

Construction Year	Emissions (pounds per day) [a]					
	ROG [b]	NO_x	CO	SO2	PM_{10}	$PM_{2.5}$
2022	2.17	35.89	20.61	0.10	3.26	1.43
2023	1.80	15.28	20.10	0.05	2.37	1.02
2024	21.48	14.55	19.80	0.05	2.30	0.96
Maximum Unmitigated Construction Emissions [c]	**21.48**	**35.89**	**20.61**	**0.10**	**3.26**	**1.43**
SCAQMD Daily Significance Thresholds	75	100	550	150	150	55
Over (Under)	(53.52)	(64.11)	(529.39)	(149.9)	(146.74)	(53.57)
Exceed Threshold?	No	No	No	No	No	No

Notes:
[a] Calculations assume compliance with SCAQMD Rule 403 – Fugitive Dust and Rule 1113 – Architectural Coatings.
[b] As noted in the CalEEMod User Guide, both VOC and ROGs are precursors to ozone so they are summed in the CalEEMod report under the header ROG. For the purposes of comparing the ROG value to a VOC significance threshold, the terms can be used interchangeably.
[c] The Maximum emissions are based on the peak daily emissions that occur throughout the year. The CalEEMod worksheets are provided in Appendix A to this MND.
Source: Parker Environmental Consultants, 2021.

Operational Impacts

The Project's operational emissions were quantified for a new 14-story building with 184,629 square feet of office space and 4,325 square feet of retail commercial uses on the ground floor. Operational emissions would be generated by building energy systems (i.e., heating, cooling, and energy use) and mobile source emissions by employees, vendors, and visitors traveling to and from the Project. The Project emissions estimates are based on the CalEEMod (*Version 2016.3.2*) model and are contained in Appendix A to this IS/MND. It should be noted that the Project's emissions are all net new emissions and are in addition to the existing baseline emissions that are generated on the Project Site. As shown in Table 4.6, below, the net new operational emissions generated by the Project would not exceed the daily regional thresholds of significance set by the SCAQMD. Therefore, impacts associated with regional operational emissions from the Project would be less than significant without mitigation.

Criterion 2

Would the Project exceed the assumptions utilized in preparing the AQMP?

The 2016 AQMP is composed of stationary and mobile source emission reduction strategies from traditional regulatory control measures, incentive-based programs, co-benefits from climate programs, furthering deployment of cleaner technologies, mobile source strategies and reductions from federal sources. These strategies are implemented in partnership with the CARB and the U.S. EPA. In addition, SCAG's 2016-2040 RTP/SCS includes transportation programs, measures, and strategies generally designed to reduce VMT, which are contained within baseline

Table 4.6
Project Peak Daily Regional Operational Emissions

Emissions Source	Emissions in Pounds per Day					
	ROG [a]	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Area Source	4.30	<0.01	0.06	0.00	<0.01	<0.01
Energy	0.08	0.75	0.63	<0.01	0.06	0.06
Mobile (Vehicles)	2.73	12.55	32.78	0.14	12.10	3.30
Stationary Source	0.82	3.67	2.09	<0.01	0.12	0.12
Total Project Emissions	***7.93***	***16.97***	***35.56***	***0.14***	***12.28***	***3.48***
Total Project Site Emissions [b]	*13.55*	*32.72*	*66.56*	*0.25*	*20.47*	*5.84*
SCAQMD Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Potentially Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**

[a] As noted in the CalEEMod User Guide, both VOC and ROGs are precursors to ozone so they are summed in the CalEEMod report under the header ROG. For the purposes of comparing the ROG value to a VOC significance threshold, the terms can be used interchangeably.
[b] The total emissions from the Project Site with the Project (Project emissions plus Existing Project Site emissions) is shown for informational purposes. For purposes of determining the Project's operational air quality impacts, the net new emissions generated by the Project are compared to the SCAQMD's thresholds of significance.
Calculation data are provided in Appendix A to this MND.
Source: Parker Environmental Consultants, 2021.

emissions inventory in the 2016 AQMP. The transportation strategy and transportation control measures (TCMs), included as part of the 2016 AQMP and SIP for the Basin, are based on SCAG's 2016 RTP/SCS and Federal Transportation Improvement Program (FTIP). Some of the control measures achieve emission reductions by continuing existing regulatory requirements and programs and extensions of those programs, while some control measures are not regulatory in form, but instead focus on incentives, outreach, and education to bring about emission reductions through voluntary participation and behavioral changes needed to complement regulations.

The 2016 AQMP also assumes that general development projects will include feasible strategies (i.e., mitigation measures) to reduce emissions generated during construction and operation in accordance with SCAQMD and local jurisdiction regulations, which are designed to address air quality impacts and pollution control measures. The 2016 AQMP is based on the 2016–2040 RTP/SCS, which incorporates data from General Plans as well as local land use data, such as the Community Plan. The Project Site is not zoned for residential uses and does not propose any residential dwelling units. As such, the Project would not directly impact population or housing growth within the City. With respect to employment growth, the Project proposes a General Plan Amendment, and Height District Change to increase the allowable FAR from 1.5:1 to 4.5:1. As discussed in greater detail in Section XIV, Population and Housing, the Project would generate 756 new jobs within the City and Community Plan area. Based on SCAG's 2016-2040 RTP/SCS regional growth estimates, the population of the City is anticipated to increase to 4,609,400 residents by 2040; housing is estimated to increase to 1,690,300 housing units by 2040; and employment is estimated to increase to 2,169,100 jobs by 2040. The increase of 756 new jobs within the City is well within the projected employment growth rate for the region and would not generate a substantial need for new housing within the City.

Further, the Project would be consistent with the smart growth policies of the SCAG's 2016-2020 RTP/SCS to increase commercial uses in areas accessible to transit (i.e. Priority Growth Areas (PGAs) – Job Centers, TPAs, HQTAs, Neighborhood Mobility Areas (NMAs), Livable Corridors, and Spheres of Influence (SOIs)).[30] The Project is located within a HQTA, which is defined as a generally walkable transit village or corridor within one half-mile of a well-serviced transit stop, or a transit corridor with 15-minute or less service frequency during peak commute hours. The Project Site is within a half of a mile (walking distance) of several Metro lines (local lines 18, 60, 62; and rapid lines 720 and 760), the LADOT DASH Downtown A bus line, and a regional Greyhound Lines, Inc., station, all of which connect to regions of the Los Angeles area and beyond. Some of these stops have peak commute service intervals of 15 minutes or less (see Figure 3.1, Project Location Map) meeting the criteria of a HQTA. Thus, the Project Site's location provides opportunities for employees, visitors, and patrons to use public transit to reduce vehicle trips.

In addition to the AQMP, the SCAQMD has prepared the *CEQA Air Quality Handbook* (1993) to assist lead agencies, as well as consultants, project proponents, and other interested parties, in evaluating potential air quality impacts of projects and plans proposed in the Basin.[31] Reports by the California Department of Transportation and SCAG have found that focusing development in areas served by transit can result in local, regional, and statewide benefits including reduced air pollution and energy consumption.[32,33] As such, the Project's close proximity to other commercial and office land uses and regional transit would result in fewer trips and a reduction to the Project's VMTs as compared to the base trip rates for similar stand-alone land uses that are not located in close proximity to transit. Thus, because the Project would be consistent with the growth projections and regional land use planning policies of the RTP/SCS and would result in a less than significant VMT impacts, as discussed in Section XVII, Transportation, the Project would not conflict with or obstruct implementation of the 2016 AQMP, and Project impacts would be less than significant.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Less Than Significant Impact. A significant impact may occur if a project adds a considerable cumulative contribution to federal or State non-attainment pollutants. As the Basin is currently in State non-attainment for ozone, $PM_{10,}$ and $PM_{2.5}$, related projects could exceed an air quality standard or contribute to an existing or projected air quality exceedance. With respect to determining the significance of a project's contribution of emissions, the SCAQMD neither recommends quantified analyses of construction and/or operational emissions from multiple development projects nor provides methodologies or thresholds of significance to be used to

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[30] *While it is noted that SCAG recently published the 2020-2045 RTP/SCS (Connect SoCal Plan) in September 2020, the 2016 AQMP is based on the regional growth projections as contained in the 2016-2020 RTP/SCS.*

[31] *SCAQMD, CEQA Air Quality Handbook, April 1993.*

[32] *California Department of Transportation, California Transportation Plan 2050, February 2021, website: https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/ctp-2050-v3-a11y.pdf, accessed August 2021.*

[33] *Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, April 2016.*

assess the cumulative emissions generated by multiple cumulative projects. Instead, the SCAQMD recommends that a project's potential contribution to cumulative impacts be assessed utilizing the same significance criteria as those for project specific impacts. Thus, a project may result in a significant impact in cases 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. Furthermore, based on SCAQMD guidance, if an individual development project generates less than significant construction or operational emissions, then the development project would not generate a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment.

As shown in Tables 4.5 and 4.6, above, the Project's estimated peak daily regional construction and operational emissions generated for ROG, PM_{10}, and $PM_{2.5}$ would be below the regional daily emissions significance thresholds for construction and operation. Therefore, the construction and operation of the Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard, and Project impacts would be less than significant.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. A significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors. Sensitive receptors are populations that are more susceptible to the effects of air pollution than the population at large. The SCAQMD identifies the following as sensitive receptors: long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes, residences, schools, playgrounds, childcare centers, and athletic facilities.[34] Figure 4.1, Air Quality Sensitive Receptors, below, identifies sensitive receptors within approximately 500 feet of the Project Site that may be affected by the Project's localized emissions during the construction phase. Air quality-sensitive land uses that are located at greater distances from the Project Site would experience lower air pollutant impacts from potential sources of pollutants generated by the Project due to atmospheric dispersion effects. Based on a review of the vicinity of the Project Site, the following sensitive receptors were identified:

1) AMP Lofts, 695 S. Santa Fe Avenue (multi-family residential)

2) Artists' Lofts, 2101 7th Street (multi-family residential)

3) Brick Lofts, 652 Mateo Street (multi-family residential)

For the purposes of assessing pollution concentrations upon sensitive receptors, the SCAQMD has developed LSTs that are based on the number of pounds of emissions per day that can be generated by a project that would cause or contribute to adverse localized air quality impacts. These localized thresholds, which are found in the mass rate look- up tables in the "Final Localized

[34] *South Coast Air Quality Management District, Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, May 6, 2005 website: http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf, accessed April 2019.*

Significance Threshold Methodology" document prepared by the SCAQMD,[35] apply to projects that are less than or equal to five acres in size and are only applicable to the following criteria pollutants: NO_x, CO, PM_{10}, and $PM_{2.5}$. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standards, and are developed based on the ambient concentrations of that pollutant for each SRA. For PM_{10}, the LSTs were derived based on requirements in SCAQMD Rule 403 − Fugitive Dust. For $PM_{2.5}$, the LSTs were derived based on a general ratio of $PM_{2.5}$ to PM_{10} for both fugitive dust and combustion emissions.

LSTs are provided for each of SCAQMD's 38 SRAs at various distances from the source of emissions. The Project Site is located within SRA 1, which covers the Central Los Angeles County Coastal area. Based on the distance of the closest sensitive receptor (e.g., the AMP Lofts, 260 feet southwest of the Project Site) identified above, the LSTs for a one-acre site within 100 meters (328 feet) was used to determine the potential localized air quality impacts associated with the construction-related NOx, CO, PM_{10}, and $PM_{2.5}$ emissions for each year of construction. As noted in Table 4.7, Project Localized On-Site Peak Daily Construction Emissions, the Project's localized construction emissions are well below the applicable thresholds of significance. As such, the Project would not expose sensitive receptors to substantial pollutant concentrations, and impacts would be less than significant.

Table 4.7
Project Localized On-Site Peak Daily Construction Emissions

Construction Phase	Total On-site Emissions (Pounds per Day)			
	NO_x [a]	CO	PM_{10}	$PM_{2.5}$
Project Construction (2021-2025) [b]	14.71	14.94	1.26	0.83
SCAQMD Localized Thresholds [c]	**82**	**1,259**	**33**	**10**
Potentially Significant Impact?	**NO**	**NO**	**NO**	**NO**

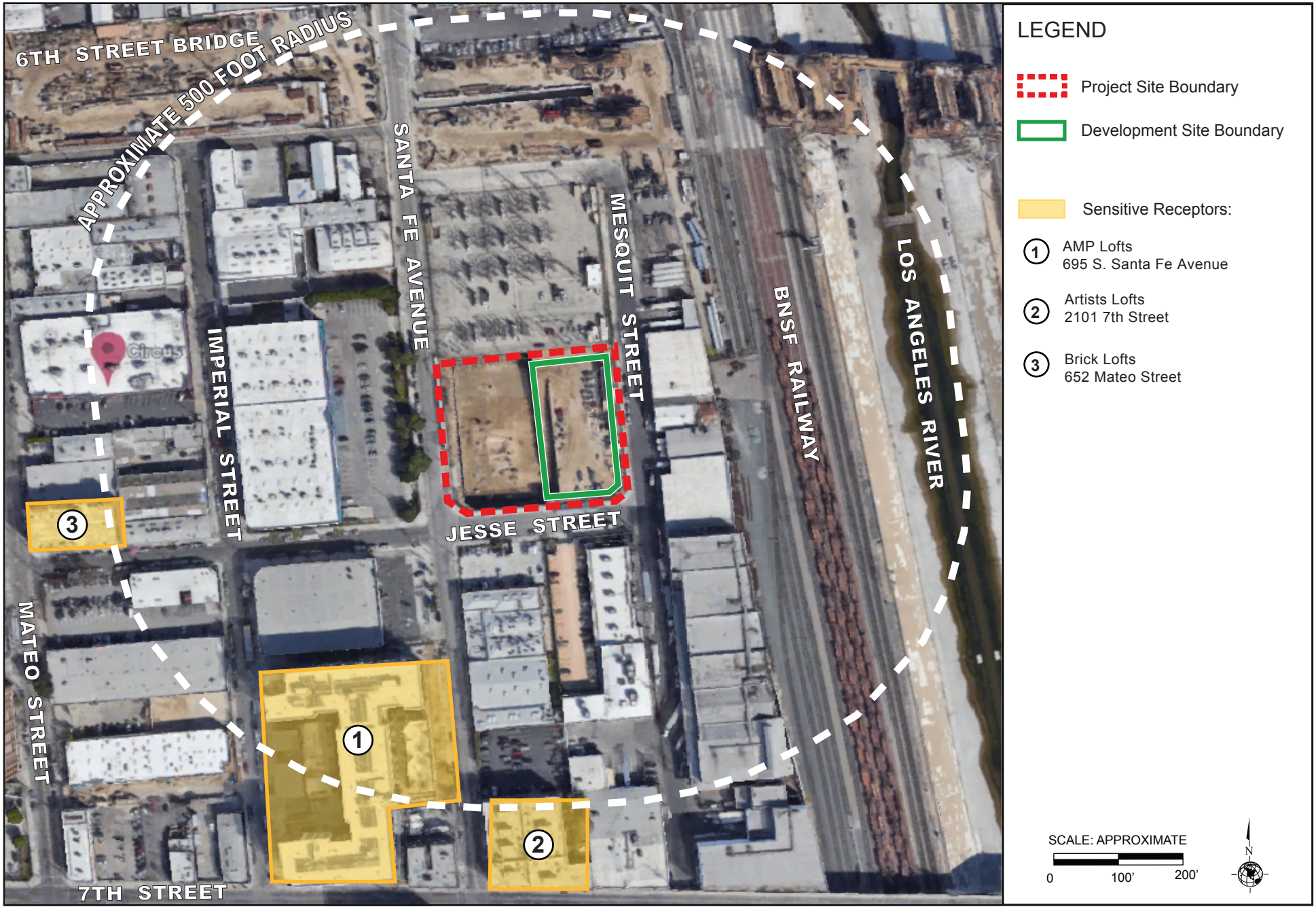
[a] *The localized thresholds listed for NO_x takes into consideration the gradual conversion of NO_x to NO_2, and are provided in the mass rate look-up tables in the SCAQMD's "Final Localized Significance Threshold Methodology" guidance document. The analysis of localized air quality impacts associated with NO_x emissions is focused on NO_2 levels as they are associated with adverse health effects.*

[b] *The LST emissions for the Project are based on the on-site emissions shown in the CalEEMod Calculation sheets provided in Appendix A to this IS/MND.*

[c] *The localized thresholds for all phases are based on a receptor within a distance of 328 feet (100 meters) in SCAQMD's SRA 1 for a Project Site of one acre.*

Source: Parker Environmental Consultants, LLC.

[35] *South Coast Air Quality Management District, Final Localized Significance Threshold Methodology, June 2003, Revised July 2008, website: http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf?sfvrsn=2, accessed August 2020.*



Source: Google Earth, Aerial View, 2021.

Figure 4.1
Air Quality Sensitive Receptors

Localized Operation Emissions

With regard to localized emissions from motor vehicle travel, traffic congested roadways and intersections have the potential to generate localized high levels of carbon monoxide (CO). The Basin is currently in attainment for CO emissions, and based on existing ambient CO levels within the Basin, mobile source emissions from the Project would not exceed the 1-hour or 8-hour CO hotspot concentration threshold for creating a significant impact. This finding is consistent with the AQMD's 2003 AQMP, which modeled localized CO emissions at the four highest traffic volume intersections within the Basin and found the localized emissions to be well below the thresholds of significance for both the 1-hour and 8-hour thresholds. The study intersections included: (a) Wilshire Boulevard and Veteran Avenue; (b) Sunset Boulevard and Highland Avenue; (c) La Cienega Boulevard and Century Boulevard; and (d) Long Beach Boulevard and Imperial Highway. The intersection of Wilshire Boulevard and Veteran Avenue, which is located approximately 12.54 miles west of the Project Site, was identified as the most congested intersection in Los Angeles County, with an average daily traffic volume of about 100,000 vehicles per day.[36] As reported in the 2016 AQMP, the highest concentrations of CO continued to be recorded in the areas of Los Angeles County, where vehicular traffic is most dense, with the maximum 8-hour and 1-hour concentration (4.3 ppm and 3.0 ppm, respectively) recorded in the South Central Los Angeles County area. Thus, as the Basin is still in attainment for CO, and since ambient CO concentrations in the Basin remain lower than the highest recorded CO concentrations in 2003, it can be concluded that the Project would not result in a significant localized CO hotspot impact. Therefore, no further analysis for CO hotspots is warranted, and localized operational emissions would be less than significant.

Toxic Air Contaminants (TAC)

Construction Emissions

The Project's construction activities would generate toxic air contaminants ("TACs") in the form of diesel particulate matter ("DPM") emissions associated with the use of heavy trucks and construction equipment during construction. DPM has no acute exposure factors (i.e., no short-term effects). Therefore, the SCAQMD Handbook does not recommend an analysis of TACs from short-term construction activities, which result in a limited duration of exposure. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. Specifically, "Individual Cancer Risk" is the likelihood that a person continuously exposed to concentrations of TACs over a 70-year lifetime will contract cancer based on the use of standard risk assessment methodology. Given the short-term construction schedule of approximately 24 months, the Project would not result in a long-term (i.e., 70-year) source of TAC emissions. No residual emissions and corresponding individual cancer risk are anticipated after construction. Because there is such a short-term exposure period (24 out of 840 months of a 70-year lifetime), health risks associated with DPM emissions during construction would be less than significant. Moreover, the Project would be required to comply with the CARB Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than 5

[36] *South Coast Air Quality Management District, 2003 Air Quality Management Plan, Appendix V: Modeling and Attainment Demonstrations, (2003) V-4-24, website: https://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/2003-aqmp, accessed August 2020.*

minutes at a location. In addition, as discussed above, the Project would not result in a localized significant impact. Therefore, the Project would result in a less than significant impact related to construction TACs.

Operational Emissions

The Project would include office, retail, and restaurant land uses. These commercial uses would not support any land uses or activities that would involve the use, storage, or processing of carcinogenic or non-carcinogenic toxic air contaminants. As such no significant toxic airborne emissions would result from Project implementation and operation**.** The only potential source of toxic air contaminants generated by the Project would be diesel particulate matter (DPM), which would be generated by motor vehicles traveling to and from the Project Site. Operation of the Project would generate a relatively small amount of ongoing operational DPM emissions from a minimal number of diesel-fueled vehicles (e.g., delivery trucks), as compared to an industrial oil refinery facility that has numerous heavy-duty industrial-sized equipment and industrial processes. The SCAQMD only recommends that health risk assessments be conducted for substantial sources of DPM (e.g., truck stops and warehouse distribution facilities that generate more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units, transit centers, ships hoteling at ports, and idling trains) and has provided guidance for analyzing mobile source diesel emissions. Based on the National Cooperative Highway Research Program Truck Trip Generation Data, the project is conservatively estimated to generate approximately 8 truck trips per day.[37] Since daily truck trips to the Project Site would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units the Project no further analysis is warranted under the SCAQMD's guidance. Further, as noted in response to Checklist Question III, Air Quality, the Project's air quality emissions would be well below the threshold levels for all five criteria pollutants, including PM_{10} and $PM_{2.5}$., which comprise DPM.[38] As such, the Project is not considered to be a substantial source of DPM emissions. Therefore, impacts associated with the operational release of toxic air contaminants would be less than significant.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact. A significant impact may occur if objectionable odors occur that would adversely impact sensitive receptors. Odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills.

During construction, potential sources that may emit odors during construction activities include the use of architectural coatings, solvents, and asphalt paving. SCAQMD Rule 1108 and 1113

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[37] *National Cooperative Highway Research Program (NCHRP) Synthesis 298 Truck Trip Generation Data, 2001, http://onlinepubs.trb.org/onlinepubs/nchrp/nchrp_syn_298.pdf. Table D-2d of the NCHRP data (Trip Generation Summary—Daily Commercial Vehicle Trips per 1,000 sf of Building Space for Office and Services) provides an average of 0.039 truck trips per 1,000 square feet.*

[38] *Based information presented in the Scientific Review Panel Findings for the Proposed Identification of Diesel Exhaust as a Toxic Air Contaminant Report, May 27, 1998, https://www.arb.ca.gov/ srp/findings/4-22-98.pdf, approximately 94 percent of DPM particles are less than 2.5 microns in diameter, with the remaining 6 percent comprised of particle sizes between 2.5 and 10 microns in diameter.*

limits the amount of volatile organic compounds from cutback asphalt and architectural coatings and solvents, respectively. Based on mandatory compliance with SCAQMD Rules, construction activities and materials used in the construction of the Project would not create a significant source of objectionable odors. The Project does not include any of the uses identified by the SCAQMD as being associated with odors, such as agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, or fiberglass molding. As the Project would involve no elements related to these types of activities, no odors from these types of uses are anticipated.

Odors from garbage chutes and enclosed refuse containers would be controlled through standard best management practices and ongoing building maintenance procedures. While restaurant-related uses have the potential to generate odors from cooking and disposal of organic waste, restaurant operators would be subject to SCAQMD Rule 1138, which requires the installation of odor-reducing equipment. Garbage collection areas for the Project Site would have the potential to generate foul odors if the areas are located in close proximity to habitable areas. The commercial trash collection areas would be enclosed and would not be located near any habitable areas. In addition, SCAQMD Rule 402 (Nuisance), and SCAQMD Best Available Control Technology ("BACT") Guidelines would limit potential objectionable odor impacts during the Project's long-term operations phase. With compliance with SCAQMD Rules 402 and 1138, described above, potential objectionable odor impacts would be less than significant.

Mitigation Measures

Project impacts with regard to air quality would be less than significant. Therefore, no mitigation measures are required.

Cumulative Impacts

Less Than Significant Impact. Development of the Project in conjunction with the related projects in the Project Site vicinity would result in an increase in construction and operational emissions in an already urbanized area of the City of Los Angeles.

Cumulative development can affect the implementation of the 2016 AQMP. The 2016 AQMP was prepared to accommodate growth, reduce pollutants within the areas under SCAQMD jurisdiction, improve the overall air quality of the region, and minimize the impact on the economy. Growth considered to be consistent with the 2016 AQMP would not interfere with attainment because this growth is included in the projections utilized in the formulation of the AQMP. Consequently, as long as growth in the Basin is within the projections for growth identified by SCAG, implementation of the 2016 AQMP will not be obstructed by such growth, and cumulative impacts would be less than significant. Since the Project is consistent with SCAG's growth projections, the Project would not have a cumulatively considerable contribution to an impact regarding a potential conflict with or obstruction of the implementation of the applicable air quality plan. Thus, cumulative impacts related to conformance with the 2016 AQMP would be less than significant.

Cumulative air quality impacts from construction and operation of the Project, based on SCAQMD guidelines, are analyzed in a manner similar to Project-specific air quality impacts. The SCAQMD recommends that a project's potential contribution to cumulative impacts should be assessed

utilizing the same significance criteria as those for project specific impacts. Therefore, according to the SCAQMD, individual development projects that generate construction or operational emissions that exceed the SCAQMD recommended daily thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment. Thus, as discussed in response to Checklist Question III above, because the construction-related and operational daily emissions associated with the Project would not exceed the SCAQMD's recommended thresholds, these emissions associated with the Project would not be cumulatively considerable. Therefore, cumulative air quality impacts would be less than significant.

With respect to cumulative odor impacts, potential sources that may emit odors during construction activities at each related project include the use of architectural coatings, solvents, and asphalt paving. SCAQMD Rule 1113 limits the amount of volatile organic compounds from architectural coatings and solvents. Based on mandatory compliance with SCAQMD Rules, construction activities and materials used in the construction of the Project and related projects would not combine to create objectionable construction odors. With respect to operations, SCAQMD Rules 402 (Nuisance), and SCAQMD BACT Guidelines would regulate any objectionable odor impacts from the related projects and the Project's long-term operations. Thus, cumulative odor impacts would be less than significant.

Mitigation Measures

Cumulative impacts with regard to air quality would be less than significant. Therefore, no mitigation measures are required.

IV. Biological Resources

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

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

a) Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

No Impact. 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 federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern under state or federal plans, policies or regulations; (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, light) to a degree that may diminish the chances for long-term survival of a sensitive species.

The Project Site is located in an urbanized area of the Central City North community of the City of Los Angeles. The western half of the Project Site is currently improved with the 640 S. Santa Fe Avenue building, a four-story mixed-use office and ground floor commercial building with two levels of subterranean parking. The eastern half of the Project Site, the Development Site, is improved as a surface parking lot for the 640 S. Santa Fe Avenue building. The Project Site does not contain any critical habitat or support any species identified as endangered, threatened, rare, protected, candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game ("CDFG") or U.S. Fish and Wildlife Service ("USFWS") (IPaC Resource List is provided in Appendix K). There is one identified threatened species, the Coastal California Gnatcatcher, that lives within the region where the

Project Site is located. However, the Project Site is located outside of the critical habitat zone by the Information for Planning and Consultation website serviced by the U.S. Fish and Wildlife Service and no vegetation exists within the Project Site that could support the Coastal California Gnatcatcher. The Project would have no impact on a sensitive biological species or habitat.

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

No Impact. 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 federal 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. No riparian or other sensitive natural communities are present on or adjacent to the Project Site. Therefore, implementation of the Project would not result in any adverse impacts to riparian habitat or other sensitive natural communities, and no impact would occur.

c) Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. A project would normally have a significant impact on biological resources if it could result in the alteration of an existing wetland habitat. The western half of the Project Site is currently improved with the 640 S. Santa Fe Avenue building, a four-story office and ground floor commercial building with two levels of subterranean parking. The eastern half of the Project Site, which is the proposed Development Site, is currently improved as a surface parking lot for the 640 S. Santa Fe Avenue building. The Project Site does not contain wetlands or natural drainage channels and thus does not have the potential to support any riparian or wetland habitat, as defined by Section 404 of the Clean Water Act (See Section IV(b), above). Therefore, the Project would have no impacts to riparian or wetland habitats.

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

Less Than Significant Impact. A project would normally have 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. As previously mentioned, the western half of the Project Site is currently improved with the 640 S. Santa Fe Avenue building and the Development Site is currently improved as a surface parking lot for the 640 S. Santa Fe Avenue building. The Project Site includes ornamental species and street trees that have been recently planted as part of the 640 S. Santa Fe Avenue Project. Due to the highly urbanized immediate surroundings of the Project Site, there are no wildlife corridors or native wildlife nurseries in the immediate vicinity. The Los Angeles River is located approximately 375 feet east

of the Project Site. However, due to this distance from the LA River, and the development of other industrial properties between the Project Site and the LA River, the Project would not interfere with the movement of any migratory fish and would likely not interfere with any wildlife species or wildlife corridor along the River, or significantly affect any native wildlife nursery sites. Further, while the relocation of the recently planted non-protected trees within the surface parking lot would not be considered a significant impact under CEQA, the removal or relocation of any trees would have the potential to impact nesting bird species if they are present at the time of tree removal. Nesting birds are protected under the Federal Migratory Bird Treaty Act (MBTA) *(Title 16, United States Code, Section 703 et seq., see also Title 50, Code of Federal Regulation, Part 20)* and Section 3503 of the California Department of Fish and Game Code. To ensure compliance with the MBTA, the City of Los Angeles Department of City Planning imposes standard regulatory compliance measures advising applicants to avoid tree removal activities during the breeding season. If avoidance is not feasible, the Department of City Planning recommends weekly bird surveys be conducted to ensure that the trees proposed for removal are not occupied by nesting birds. Thus, with adherence to the MBTA, the Project would have a less than significant impact on sensitive biological species or habitat. Therefore, the Project would result in a less than significant impact upon wildlife species or the use of native wildlife nursery sites.

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

No Impact. A project-related significant adverse effect could occur if a project were to cause an impact that is inconsistent with local regulations pertaining to biological resources, such as the City of Los Angeles Protected Tree Ordinance No. 177,404. The Development Site of the Project is currently a paved surface parking lot with 21 recently planted trees for the 640 S. Santa Fe Avenue Project. There are no protected tree species on-site or within the public right-of-way. Trees that exist on the Project Site or within the public-right of way adjacent to the Project Site are those that have been recently planted as part of the 640 S. Santa Fe Avenue Project. Therefore, the Project would not have the potential to conflict with the City of Los Angeles Protected Tree Ordinance. The Project would not conflict with a policy or ordinance protecting biological resources, and therefore no impact would occur.

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

No Impact. A significant impact would occur if the Project would be inconsistent with mapping or policies in any conservation plans of the types cited. The Project Site is not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, the Conservation Element of the City, or other approved local, regional or state habitat conservation plan. The Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan and no impacts related to such plans or policies would occur.

Mitigation Measures

Project impacts with regard to biological resources would be less than significant. Therefore, no mitigation measures are required.

Cumulative Impacts

Less Than Significant Impact. The Project would have a less than significant impact upon biological resources with regulatory compliance. Development of the Project in combination with related projects would not significantly impact wildlife corridors or habitat for any endangered, threatened, rare, protected, candidate, sensitive, or special status species identified in local plans, policies, or regulations, or by the CDFG or the USFWS as no such habitat occurs in the vicinity of the Project Site due to the existing urban development. Development of any of the related projects would be subject to the City of Los Angeles Protected Tree Ordinance, Federal Migratory Bird Treaty Act, Sections 3503, 3503.5, and 3513 of the CDFG Code, and any other mitigation measures or regulatory compliance measures applicable to each project site. Thus, cumulative impacts to biological resources would be considered less than significant.

Mitigation Measures

Cumulative impacts with regard to biological resources would be less than significant. Therefore, no mitigation measures are required.

V. Cultural Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☐	☐	☐	☒
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☐	☒	☐
c. Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

The following section summarizes and incorporates by reference information from the Central City North Community Plan; and SurveyLA's Historic Resources Report for the Central City North Community Plan Area, including its appendices: Appendix A: Individual Resources, Appendix B: Non-Parcel Resources, and Appendix C: Historic Districts, Planning Districts, and Multiple Property Resources.

a) Cause a substantial adverse change in the significance of a historical resource as pursuant to §15064.5?

No Impact. A significant impact may occur if the Project would result in a substantial adverse change in the significance of a historic resource. Section 15064.5 of the State CEQA Guidelines defines a 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. A substantial adverse change in the significance of a historic resource means demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.[39]

The eastern half of the Project Site, the Development Site, is currently improved as a surface parking lot for the 640 S. Santa Fe Avenue Project. The findings from the Central City North Community Plan and SurveyLA's Historic Resources Report for the Central City North Community Plan Area (including its Appendices A through C) indicate that the Project Site is not located within a Historic District or a Historic Preservation Overlay Zone and has not been determined to be eligible for listing in the National Register of Historic Places, the California Register of Historic Resources, the Los Angeles Historic-Cultural Monuments Registry, or as having historic significance in SurveyLA.[40,41]

The closest historic resource to the Project Site is the National Biscuit Company Building, built in 1925, which is designated as Los Angeles Historic-Cultural Monument No. 888, located 790 feet southwest of the Project Site.[42,43] The Project would develop a surface parking lot with a 14-story office and ground floor commercial building. The Project would have no direct or indirect impacts upon the National Biscuit Company Building. As such, the Project would not directly or indirectly affect a historic resource. Therefore, the Project would not cause an adverse change in the significance of a historic resource, and no impact would occur.

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[39] *CEQA Statute and Guidelines, Section 15064.5(b)(1).*

[40] *Los Angeles Department of City Planning, Central City North Community Plan, December 15, 2000, website: https://planning.lacity.org/plans-policies/community-plan-area/central-city-north, accessed August 2020.*

[41] *Los Angeles Department of City Planning, SurveyLA Results: Central City North Community Plan Area, website: https://planning.lacity.org/preservation-design/survey-la-results-central-city-north, accessed August 2020.*

[42] *City of Los Angeles, Department of City Planning, SurveyLA Results: Central City North, website: https://planning.lacity.org/preservation-design/survey-la-results-central-city-north, accessed August 2020.*

[43] *Los Angeles Historic Resources Inventory, Historic Places LA, website: http://www.historicplacesla.org/map, accessed August 2020.*

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

Less Than Significant Impact. A significant impact may occur if grading or excavation activities associated with the Project would disturb archaeological resources.

The Los Angeles General Plan Framework Environmental Impact Report ("Framework EIR") Cultural Resources Section was used to determine whether any known archaeological resources exist on-site or in proximity to the Project Site. This Section compiled archaeological and paleontological information and data gathered from the Natural History Museum of Los Angeles County, the California Archaeological Inventory – Regional Information Center, and the City of Los Angeles Cultural Affairs Department. Figure CR-1, in the Framework EIR Cultural Resources Section, depicts archaeological sites and survey areas within the City. As shown in Figures CR-1, no known archaeological resources were identified on the Project Site. The nearest known archaeological resource is the Los Angeles River, located approximately 375 feet east of the Development Site of the Project. This is further supported by the South Central Coastal Information Center response letter (see Appendix I.2 of this IS/MND), which completed a records search for the Project Site and ½ mile radius of the Project area.[44] The search included a review of all recorded archaeological and built-environment resources, as well as a review of cultural resource reports on file. An additional search of California Points of Historical Interest, California Historical Landmarks, California Register of Historical Resources, National Register of Historic Places, California State Built Environment Resources Directory, and City of Los Angeles Historic-Cultural Monuments listings were reviewed for the Project Site and a ½ mile radius of the Project area.

The SCCIC response letter concluded that there were five known archaeological resources within a ½ mile radius of the Project Site and no known or previously recorded archaeological resources located on the Project Site. The natural ground surface of the area appears to be obscured by urban development. Consequently, surface artifacts would not be visible during a survey of the property. However, the SCCIC response letter indicated that historic maps of the buried remains of the Zanja Madre, a historical water conveyance system, indicate there is a strong potential for this resource to be within or adjacent to the Project Site. Because of this potential, the SCCIC recommends that a qualified archaeologist be retained to monitor ground-disturbing activities. However, based on a review of other environmental documents and archaeological resource assessments conducted for projects in the local area,[45] the closest recorded segment of the Zanja Madre is located in the vicinity of Mateo Street, over 650 feet to the west of the Project Site. As the alignment of the Zanja Madre is in a north-south orientation, the alignment would not intersect with the Project Site.

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[44] *The occurrence of previously recorded archaeological resources within ½ mile of the Project Site could indicate the likelihood of similar resources to be located within other areas in the project vicinity or on the Project Site. The assessment of whether such resource are likely to be found on or beneath the Project Site is dependent upon the nature of the archeological resources recorded in the area.*

[45] *See Phase I Archaeological Assessment for 676 Mateo Street Project, February 2020, City of Los Angeles Case No. ENV-2016-3691-EIR.*

The SCCIC also recommends the Native American Heritage Commission be consulted on the location of properties or sacred sites in the area.

The western half of the Project Site was recently developed with the 640 S. Santa Fe Avenue building. Construction of the 640 S. Santa Fe Avenue building included excavating the ground level on the western half of the Project Site to approximately 25 feet below grade level to accommodate a two-level subterranean parking structure. No archaeological resources were discovered during the construction of the 640 S. Santa Fe Avenue Project building. The Development Site of the Project, located on the eastern half of the Project Site, is currently improved as a surface parking lot for the 640 S. Santa Fe Avenue Project. The Project would redevelop the surface parking lot into a 14-story office and ground floor commercial building with two levels of subterranean parking and five levels of parking above grade. The two levels of subterranean parking would require excavation and grading activities to ensure the proper base and slope under the proposed building. Thus, there is potential for the inadvertent discovery of unknown archaeological resources on the Development Site of the Project. However, given the similar nature of the excavation that was conducted on site for the 640 S. Santa Fe Avenue building, and the lack of discovery of any significant archaeological resources during the earthwork phases of construction, the probability of encountering archaeological resources during the development of the east side of the Project Site is considered low.

In accordance with standard conditions of approval for grading permits, the Department of City Planning and Building and Safety require adherence to regulatory compliance measures and procedures related to the incidental discovery of archaeological resources discovered during construction. If archaeological resources are discovered during surface grading or construction activities, work shall cease in the area of the find until a qualified archaeologist has evaluated the find and treated it in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Personnel of the Project shall not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the Project Site proposed to be developed. Adherence to regulatory compliance measures would ensure that if any archaeological resources are encountered during construction, impacts to such resources would remain less than significant.

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

Less Than Significant Impact. A project-related significant adverse effect could occur if grading activities associated with the Project would disturb previously interred human remains. No known human burials are identified on the Project Site or its vicinity. However, it is possible that unknown human remains could occur, and if proper care is not taken during construction, damage to or destruction of these unknown remains could occur. If 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 Section 5097.98. Compliance with regulatory compliance measures would ensure any potential impacts related to the disturbance of unknown human remains would be less than significant.

Mitigation Measures

Project impacts with regard to cultural resources would be less than significant. Therefore, no mitigation measures are required.

Cumulative Impacts

Less Than Significant Impact. Implementation of the Project, in combination with the related projects in the Project Site vicinity, would result in the continued redevelopment and revitalization of the surrounding area. Impacts to cultural resources tend to be site-specific and are assessed on a site-by-site basis. The analysis of the Project's impacts to cultural resources concluded that the Project would have no significant impacts with respect to cultural resources following compliance with regulatory measures. Therefore, the Project's incremental contribution to a cumulative impact would not be considerable, and cumulative impacts to cultural resources would be less than significant.

Mitigation Measures

Cumulative impacts with regard to cultural resources would be less than significant. Therefore, no mitigation measures are required.

VI. Energy

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Regulatory Setting

Corporate Average Fuel Economy (CAFE) Standards

Enacted by Congress in 1975, the Corporate Average Fuel Economy (CAFE) standard's purpose is to reduce energy consumption by increasing the fuel economy of cars and light trucks. The CAFE standards are fleet-wide averages that must be achieved by each automaker for its car and truck fleet, each year, since 1978. When these standards are raised, automakers respond by creating a more fuel-efficient fleet. CAFE standards are regulated by the United States

Department of Transportation's (U.S. DOT) National Highway Traffic Safety Administration (NHTSA). The NHTSA sets standards to increase CAFE levels rapidly over the next several years, which will improve the nation's energy security and save consumer's money at the gas pump, while also reducing greenhouse gas (GHG) emissions. In 2012, the NHTSA established final passenger car and light truck CAFE standards for model years 2017 through 2021, which the agency projects will require in model year 2021, on average, a combined fleet-wide fuel economy of 40.3 to 41.0 miles per gallons (mpg). Currently, the U.S. DOT and the U.S. Environmental Protection Agency (U.S. EPA) propose the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule, which would amend existing CAFE standards and tailpipe carbon dioxide emissions standards for passenger cars and light trucks and establish new standards covering model years 2021 through 2026. The NHTSA and the U.S. EPA are currently seeking comment on this proposal.[46,47]

Fuel efficiency standards for medium- and heavy-duty trucks have been jointly developed by U.S. EPA and NHTSA. The Phase 1 medium- and heavy-duty truck standards apply to combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles for model years 2014 through 2018, and result in a reduction in fuel consumption from 6 to 23 percent over the 2010 baseline, depending on the vehicle type.[48] U.S. EPA and NHTSA have also adopted the Phase 2 medium- and heavy-duty truck standards, which cover model years 2021 through 2027 and require the phase-in of a 5 to 25 percent reduction in fuel consumption over the 2017 baseline depending on the compliance year and vehicle type.[49]

California Renewables Portfolio Standard

The California Renewables Portfolio Standard (RPS) program, which was established in 2002 by Senate Bill (SB) 1078, required that 20 percent of the available energy supplies in California come from renewable energy sources by 2017. In 2006, SB 107 accelerated the 20-percent mandate to 2010. These mandates apply directly to investor-owned utilities. In 2011, California Governor Jerry Brown signed into law Senate Bill 2X, which modified California's RPS program to require that both publicly- and investor-owned utilities in California receive at least 33 percent of their electricity from renewable sources by the year 2020. In October 2015, Governor Brown signed into legislation Senate Bill 350 (SB 350), which requires retail sellers and publicly-owned utilities to procure 50 percent of their electricity from eligible renewable energy resources by 2030. In 2018, Senate Bill 100 (SB 100) was signed into law, which again increases the RPS to 60 percent by 2030 and requires all of California's electricity to come from carbon-free resources by 2045. SB 100 became effective on January 1, 2019.[50]

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[46] *U.S. DOT, Corporate Average Fuel Economy (CAFE) Standards, accessed August 2020.*

[47] *U.S. DOT,NHTSA, Corporate Average Fuel Economy (CAFE), Laws and Regulations, accessed August 2020.*

[48] *U.S. EPA, NHTSA, Federal Register Volume 76, No. 179, Greenhouse Gas Emissions Standards and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles, September 15, 2011.*

[49] *U.S. EPA, NHTSA, Federal Register Volume 81, No. 206, Greenhouse Gas Emissions Standards and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles – Phase 2, October 25, 2016.*

[50] *California Public Utilities Commission, California Renewables Portfolio Standard, accessed July 2019.*

Title 24 Energy Efficiency Standards

California's Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24, Part 6 of the California Code of Regulations) ("Title 24 Standards") were established in 1978 in response to a legislative mandate to reduce California's energy consumption to ensure that building construction and system design and installation achieve energy efficiency and preserve outdoor and indoor environmental quality. The standards are updated periodically (typically every three years) to allow consideration and possible incorporation of new energy efficiency technologies and methods.

The 2019 Standards went into effect on January 1, 2020, and improve upon the 2016 Standards for new construction of, and additions and alterations to, residential and nonresidential buildings. The 2019 update to the Energy Efficiency Standards for Residential and Nonresidential Buildings focuses on several key areas to improve the energy efficiency of new constructed buildings and additions and alterations to existing buildings. The most significant efficiency improvements to the residential Standards include the introduction of photovoltaic into the prescriptive package, improvements for attics, walls, water heating, and lighting, whereas the major efficiency improvements to the nonresidential Standards include alignment with the American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) 90.1-2017 national standards. The 2019 Standards also include changes made throughout all of its sections to improve the clarity, consistency, and readability of the regulatory language. Furthermore, the 2019 update requires that enforcement agencies determine compliance with CCR, Title 24, Part 6 before issuing building permits for any construction.[51]

Part 11 of the Title 24 Building Energy Efficiency Standards is referred to as the California Green Building Standards (CALGreen) Code. The purpose of the CALGreen Code is to "improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact or positive environmental impact and encouraging sustainable construction practices in the following categories: (1) Planning and design; (2) Energy efficiency; (3) Water efficiency and conservation; (4) Material conservation and resource efficiency; and (5) Environmental air quality."[52] The CALGreen Code establishes mandatory measures for new residential and non-residential buildings. Such mandatory measures include energy efficiency, water conservation, material conservation, planning and design, and overall environmental quality. As previously mentioned, the 2019 update to the CALGreen Code went into effect on January 1, 2020. The 2019 CALGreen Code improves upon the previously applicable 2016 CALGreen Code by updating standards for bicycle parking, electric vehicle charging, and water efficiency and conservation.

[51] *California Energy Commission, 2019 Building Energy Efficiency Standards, December 2018, https://ww2.energy.ca.gov/publications/displayOneReport_cms.php?pubNum=CEC-400-2018-020-CMF*

[52] *California Building Standards Commission, 2010 California Green Building Standards Code, (2010).*

The Green New Deal Sustainable City pLAn 2019

In 2015, Mayor Eric Garcetti released the City's first Sustainable City pLAn (Sustainable City pLAn) through Executive Directive No. 7. In 2019, the Mayor's office adopted The Green New Deal Sustainable City pLAn 2019 (L.A.'s Green New Deal) as an update to the 2015 Sustainable City pLAn. L.A.'s Green New Deal establishes accelerated goals for a cleaner environment and a stronger economy, with commitment to equity as its foundation.

City of Los Angeles Green Building Code

In 2016, the Los Angeles City Council approved Ordinance No. 184,692, which amended Chapter IX of the Los Angeles Municipal Code (LAMC), referred to as the "LA Green Building Code." Ordinance No. 184,692 amended certain provisions of LAMC Chapter IX, Article 9 to reflect local administrative changes and incorporated by reference portions of the 2016 CALGreen Code. Projects filed on or after January 1, 2017, must comply with the provisions of the LA Green Building Code. Specific mandatory requirements and elective measures are provided for three categories: (1) low-rise residential buildings; (2) non-residential and high-rise residential buildings; and (3) additions and alterations to non-residential and high-rise residential buildings. Chapter IX, Article 9, Division 5 includes mandatory measures for newly constructed non-residential and high-rise residential buildings. The LA Green Building Code includes some requirements that are more stringent than State requirements such as increased requirements for electric vehicle charging spaces and water efficiency, which results in potentially greater energy demand reductions from improved transportation fuel efficiency and water efficiency. Specific measures in the LA Green Building Code intended to improve building energy efficiency and conserve energy are included as LAMC Sections 99.04.201 through 99.04.505 for residential mandatory measures and as LAMC Sections 99.05.201 through 99.05.504 for non-residential mandatory measures. These energy efficiency measures include renewable energy, indoor and outdoor water uses, water reuse systems, waste reduction, pollutant control, and interior moisture control measures.

2017 Final Power Strategic Long-Term Resource Plan (SLTRP)

In April 2018, the Los Angeles Department of Water and Power (LADWP) approved the Power Strategic Long-Term Resource Plan (SLTRP), which increases LADWP's planning horizon, by 20 years from 2037 to 2050, in order to better align with Statewide GHG emissions goals and align with Los Angeles' 100 percent clean energy initiative, detailed in the City's Los Angeles Green New Deal. In 2018, the SLTRP will extend through 2050 while a separate, streamlined IRP document will be produced for submission and filing with the California Energy Commission in accordance with the Senate Bill 350. The goal of the 2017 SLTRP is to identify a portfolio of generation resources and power system assets that meets the City's future energy needs at the lowest cost and risk consistent with LADWP's environmental priorities and reliability standards.

The 2017 Power SLTRP outlines an aggressive strategy for LADWP to accomplish its goals, comply with regulatory mandates under the State's RPS regulations, and provide sufficient resources over the next 20 years. The 2017 Power SLTRP incorporates the Enforcement Procedures for the RPS for Local Publicly Owned Electric Utilities pursuant to Section 399.30(l)

of the California Renewable Energy Resources Act (SB 2 [1X]) and identifies optional compliance measures found in the Regulations. The 2017 Power SLTRP identifies a combination of GHG reduction strategies, including early coal replacement two years ahead of schedule by 2025; accelerating LADWP's RPS to 50 percent by 2025, 55 percent by 2030, and 65 percent by 2036; doubling of energy efficiency from 2017 through 2027; repowering coastal in-basin generating units with new, highly efficient potential clean energy projects by 2029 to provide grid reliability and critical ramping capability; accelerating electric transportation to absorb GHG emissions from the transportation sector; and investing in the Power System Reliability Program to maintain a robust and reliable power system. Thus, the 2017 Power SLTRP would achieve and exceed mandates established in previous RPS. In order to achieve a 100 percent clean energy portfolio, these strategies listed in the 2017 Power SLTRP are provided for LADWP to incorporate in order to reach the City's overall 100 percent clean energy initiative, as part of the City's Green New Deal.

With respect to the status of LADWP's RPS portfolio, the LADWP increased its renewable energy percentage from 3 percent in 2003 to 25 percent in 2010.[53] LADWP exceeded the second SB2-1X compliance period of 2014 through 2016, which required the sum of 20 percent RPS for 2014, 21 percent RPS for 2015, and 29 percent RPS for 2016.[54] The 2016 Final Power Integrated Resource Plan, which preceded the 2017 Power SLTRP, identifies strategies to achieve a RPS of 50 percent by 2030 with interim targets of 40 percent by 2024 and 45 percent by 2027.[55]

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less Than Significant Impact. A significant impact would occur if the Project results in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. The Development Site is currently improved as a surface parking lot for the 640 S. Santa Fe Avenue building. The Project would redevelop the surface parking lot into a 14-story office and ground floor commercial building with two levels of subterranean parking for a total of 188,954 square feet of floor area, including 184,629 square feet of office space and 4,325 square feet of commercial retail and restaurant uses.

The Project is required to comply with the energy conservation standards established in Title 24 of the California Administrative Code. California's Energy Efficiency Standards located at Title 24, Part 6, Sections 120.0 to 120.9 and 130.0 to 141.0 of the California Code of Regulations and commonly referred to as "Title 24," which was established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to

[53] *LADWP, 2017 Final Power Strategic Long-Term Resources Plan (SLTRP), December 2017.*

[54] *SB 2X-1X SBX1-2 was signed by Governor Edmund G. Brown, Jr., in April 2011 to codify the ambitious 33 percent by 2020 goal.*

[55] *LADWP, 2016 Final Power Integrated Resource Plan, December 2016.*

allow consideration and possible incorporation of new energy efficiency technologies and methods.

California's Building Energy Efficiency Standards are updated on an approximately three-year cycle. The 2019 Standards, which became effective on January 1, 2020, [56] will continue to improve upon the 2016 Standards for new construction of, and additions and alterations to, residential and nonresidential buildings. The Energy Efficiency Standards are a specific response to the mandates of AB 32, (Health and Safety Code Sections 38500–38599), also known as the California Global Warming Solutions Act of 2006, and to pursue California energy policy that energy efficiency is the resource of first choice for meeting California's energy needs. The Project includes energy efficiency components to conserve energy, which are detailed below. The Project would also be required to comply with the LA Green Building Code, effective January 1, 2020, which requires the use of numerous conservation measures beyond those required by Title 24 of the California Administrative Code.

Existing Infrastructure and Energy Use

The Project Site is located in an urbanized area in the Central City North area of the City of Los Angeles. The Project Site is adequately served with roads, sidewalks, and underground utilities. As an infill development, further development on the Project Site would serve to conserve energy and land resources, as no substantial infrastructure improvements would be required since Project Site is already serviced by utilities such as gas, water, wastewater, and electricity.

The western half of the Project Site is improved with the 640 S. Santa Fe Avenue building, a four-story, 107,224 square-foot mixed-use office and ground floor commercial building with two levels of subterranean parking. As previously stated, the Development Site is currently improved as a surface parking lot for the 640 S. Santa Fe Avenue building. Energy use within the Development Site is limited to the power needs of the light poles within the surface parking lot. An estimate of the existing energy use from the entire Project Site is shown below in Table 4.8, Baseline Conditions Existing Electricity Demand. As shown in Table 4.8, below, the electricity demand is estimated to be 1,737,368 kilowatt hours per year (kWh/year).

[56] *California Energy Commission, 2019 Building Energy Efficiency Standards, website: https://ww2.energy.ca.gov/2018publications/CEC-400-2018-020/CEC-400-2018-020-CMF.pdf, accessed August 2020.*

Table 4.8
Project Site Baseline Conditions Existing Electricity Demand

Land Use	Size (sf)	Total Electricity Demand (kWh/year) [a]
640 S. Santa Fe Avenue Project		
Office	91,235	1,052,580
Retail	9,435	107,005
Restaurant	6,554	270,099
Enclosed Parking	216 spaces	307,684
Total Existing Electricity Demand:		**1,737,368**

Notes: sf =square feet; kWh = kilowatt-hour
[a] *SCAQMD, CalEEMod Version 2016.3.2, See Appendix D, Greenhouse Gas Emissions Modeling Worksheets (at page 17 of 25 from the Existing Conditions worksheets).*
Source: Parker Environmental Consultants, 2021.

As shown in Table 4.9, below, the existing natural gas demand at the Project Site was estimated to be 2,393,158 kBTU/yr or 195,441 cubic feet (cf) per month. No natural gas is being generated or consumed within the Development Site, which is currently improved with a surface parking lot.

Table 4.9
Project Site Baseline Conditions Natural Gas Demand

Land Use	Size (sf)	Total Natural Gas Demand (kBTU/yr) [a]	Total Natural Gas Demand (cf/month) [b]
640 S. Santa Fe Avenue Project			
Office	91,235	885,764	72,337
Retail	9,435	14,714	1,202
Restaurant	6,554	1,492,680	121,902
Total Existing Natural Gas Demand:		**2,393,158**	**195,441**

Notes: sf = square feet; kBTU = British Thermal Units; cf = cubic feet
[a] *1kBTU is equivalent to 0.98 cubic feet of natural gas.*
[a] *SCAQMD, CalEEMod Version 2016.3.2, See Appendix D, Greenhouse Gas Emissions Modeling Worksheets (at page 15 of 25 from the Existing Conditions worksheets).*
Source: Parker Environmental Consultants, 2021.

Table 4.10, below, summarizes the estimated amount of fossil fuel demand from vehicles traveling to and from the Project Site. Based on the LADOT VMT Calculator output for the existing conditions, the creative office and retail/restaurant uses for the 640 S. Santa Fe Avenue building generate an average of 1,323 trips per day resulting in 10,257 daily vehicle miles traveled. Based on an average fuel efficiency of 25.30 mpg for gasoline vehicles and 9.88 mpg for diesel vehicles, it is estimated that the operation of the existing 640 S. Santa Fe Avenue building generates a demand for approximately 163,635 gallons of fuel including 137,191 gallons of gasoline and 26,443 gallons of diesel fuel on an annual basis. It should be noted that all of the transportation fuel demands are associated with the trips and land uses within the 640 S. Santa Fe Building. The Development Site, which is improved with a surface parking lot, does not generate any demand for transportation fuel.

Table 4.10
Project Site Baseline Conditions Transportation Energy Demand

Fuel Type	Annual VMTs (miles) [a]	Fuel Rate (mpg) [b]	Total Fuel Demand (gallons/year)
Diesel	261,253	9.88	26,443
Gasoline	3,470,930	25.30	137,191
Net Project Site Fuel Consumption:			**163,635**

Notes: VMTs = vehicle miles traveled; mpg = miles per gallon
[a] *See Appendix B, Energy Demand Worksheets.*
[b] *Fuel efficiency for 2021 is based on 25.30 miles per gallon (mpg) for gasoline and 9.88 mpg for diesel per EMFAC2017*
Parker Environmental Consultants, 2021.

Project Energy Consumption

Construction Energy Use

Energy would be consumed during the demolition, excavation, and construction phases of the Project for grading and materials transfer by heavy-duty equipment, which is usually diesel powered. Construction of the Project would generate an increased demand for electricity use related to the treatment and conveyance of water for dust suppression activities during the excavation and grading phase, and the consumption of gasoline and diesel fuels associated with haul trucks, deliveries, and worker commute trips. Construction activities typically do not require the consumption of natural gas to power equipment or heavy machinery. The energy use associated with construction activities for the Project were quantified as presented below.

The Project's construction energy use was estimated based on the demolition of the existing surface parking lot on the eastern portion of the Project Site, and the new construction of a 14-story commercial building with approximately 188,954 square feet of floor area and two levels of subterranean parking. Construction of the Project would require the export of asphalt from the Development Site during the demolition and site clearing phases. Additionally, approximately 31,500 cubic yards of soil would be exported as a result of the grading for the two levels of subterranean parking. Construction worker travel to and from the Project Site would result in the additional consumption of vehicular unleaded gasoline fuel during the construction period. The total electricity, gasoline, and diesel fuel anticipated to be used during construction of the Project is summarized in Table 4.11, below. As shown, construction of the Project would consume approximately 2,585 kWh of electricity, approximately 27,688 gallons of gasoline fuel, and 59,961 gallons of diesel fuel during construction.[57]

[57] *Refer to Energy Demand Worksheets included as Appendix B in this IS/MND.*

Table 4.11
Project Construction Energy Demand

Fuel Type	Quantity
Electricity	2,585 kWh
Gasoline fuel	27,688 gallons
Diesel fuel	59,961 gallons

Notes: kWh = Kilowatt-hour
Calculation worksheets are provided in Appendix B, Energy Demand Worksheets, to this IS/MND.
Source: Parker Environmental Consultants, 2021.

Due to the relatively short duration of the construction process, and the fact that the extent of fuel consumption is inherent to construction projects of this size and nature, fuel consumption impacts would not be considered excessive or substantial with respect to regional fuel supplies. Further, compliance with regulatory compliance measures, such as restricting haul trucks to off-peak hours and not allowing engines to idle excessively when not in use (AQMD Rule 403), and meeting specified fuel and fuel additive requirements and emission standards (C.C.R. Title 13, Sec. 2485), would further serve to increase energy efficiency and reduce consumption of fossil fuels. The energy demands during construction would be typical of construction projects for projects of this size and would not necessitate additional energy facilities or distribution infrastructure or cause wasteful, inefficient or unnecessary consumption of energy. Accordingly, energy demands during construction would be less than significant.

The energy analysis does not include a full life cycle analysis of energy usage that would occur over the production/transport of materials used during the construction of the Project or used during the operational life of the Project, or the end of life for the materials and processes that would occur as an indirect result of the Project. Estimating the energy usage associated with these processes would be too speculative for meaningful consideration, would require analysis beyond the current regulatory standards in CEQA impact assessment, and may lead to a false or misleading level of precision in reporting. Manufacture and transport of materials related to Project construction and operation is expected to be regulated under regulatory energy efficiency requirements. Therefore, it is assumed that the Project's energy usage related to construction materials would be consistent with current regulatory requirements regarding energy usage.

Operational Energy Demand

Electricity

The Project would be required to comply with energy conservation standards pursuant to Title 24 of the California Administrative Code. The Project would also be required to comply with the LA Green Building Code. The LA Green Building Code, effective January 1, 2020, requires the use of numerous conservation measures, beyond those required by Title 24 of the California Administrative Code. The LA Green Building Code contains both mandatory and voluntary green building measures to conserve energy. Among many requirements, the LA Green Building Code requires projects to achieve a 20 percent reduction in wastewater generation. Therefore, compliance with Title 24 of the California Administrative Code and the LA Green Building Code would reduce the Project's energy consumption.

The LA Green Building Code imposes energy conservation measures for all new projects to further reduce energy demands within new buildings. Implementation of code compliance measures would ensure the Project meets and exceeds the minimum Title 24 energy efficiency requirements and further reduce demand for electricity, including peak power demands. Specifically, the Project would be designed to include energy efficient appliances, water efficient plumbing fixtures and fittings, and water efficient landscaping. Stormwater would be captured on-site in accordance with Low Impact Development ("LID") Ordinance (Ordinance No. 181,899) which requires that the Project mitigate (infiltrate, filter, or treat) the runoff from a storm event producing ¾ inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater. Permeable pavement would also be installed along the southern border of the Project Site, southern entry into the pedestrian paseo, and in the northeastern landscaped area of the Project Site.

Additionally, as discussed above, electric service is available and would be provided to the development. The availability of electricity is dependent upon adequate generating capacity and adequate fuel supplies. In total, LADWP operates 21 receiving stations and 162 distribution stations to provide electricity to LADWP customers, with additional facilities to be acquired as their load increases. Power supply sources include: 29% from renewable energy sources, 34% from natural gas, 9% from nuclear, 3% from large hydro, 19% from coal, and 6% from other and unspecified sources. The estimated power requirements for the total load growth forecast for the City of Los Angeles and has been taken into account in the planned growth of the City's power system. The LADWP power system set its all-time high peak at 6,432 MW on August 31, 2017.[58] The Project's electricity demands shown in Table 4.12 are estimated based on the Project's energy demands as calculated in the CalEEMod worksheets provided in Appendix D to this IS/MND. The Project would include energy efficient lighting fixtures, low-flow water features, and energy efficient mechanical heating and ventilation systems. Additionally, as noted in Appendix J, LADWP has confirmed that electric service is available and will be provided in accordance with the LADWP's Rules Governing Water and Electric Service. Additionally, LADPW has confirmed that the estimated power requirement for this Project is part of the total load growth forecast for the City of Los Angeles and has been taken into account in the planned growth of the City's power system.[59] Therefore, the development of the Project would not cause wasteful, inefficient or unnecessary consumption of electricity.

The operational electricity demands for the Project were quantified based on the operation of a 14-story commercial building with approximately 188,954 square feet of floor area comprised of 184,629 square feet of office uses and approximately 4,325 square feet of ground floor commercial uses and two levels of subterranean parking. As shown in Table 4.12, below, the estimated net increase in total electricity demand by the Project would be approximately 3,111,922 kWh per year. The total (gross) electricity demand on the Project Site with operation of the 640 S. Santa Fe Avenue building and the Project would be 4,949,290 kWh per year. As

[58] *LADWP, 2017 Retail Electric Sales and Demand Forecast, website: https://www.dropbox.com/home/2020%20Projects/655%20Mesquit/References/City%20Admin%20Record%20References?preview=City+of+LA_Department+of+Water+and+Power_2017+Retail+Electric+Sales+and+Demand+Forecast.pdf, accessed August 2020.*

[59] *See LADWP Correspondence re: Water and Electricity Connection Services Request for 655 Mesquit Street, dated December 23, 2020 in Appendix J, Utilities and Service Request Letters.*

discussed above, compliance with Title 24 of the California Administrative Code and the LA Green Building Code would reduce energy demands across the site such that development across the Project Site would not result in wasteful, inefficient or unnecessary consumption of electricity and impacts would be less than significant.

Table 4.12
Project Electricity Demand

Land Use	Size (sf)	Total Electricity Demand (kWh/year) [a]
655 Mesquit Street Project		
Office	184,630	2,130,060
Restaurant	4,330	178,239
Enclosed Parking	397 spaces	803,623
Total Project Electricity Demand:		**3,111,922**
Plus Existing Electricity Demand:		***1,737,368***
Total Project Site Electricity Demand:		**4,849,290**

Notes: sf =square feet; kWh = kilowatt-hour
[a] See Appendix D, Greenhouse Gas Emissions Calculations Worksheets, to this IS/MND.
Source: Parker Environmental Consultants, 2021.

Natural Gas

Natural gas for the Project Site is provided by Southern California Gas ("SoCalGas"). SoCalGas projects total natural gas demand to decrease at an annual rate of 0.74 percent per year from 2018 to 2035. This decrease is due to modest economic growth, CPUC-mandated energy efficiency (EE) standards and programs, tighter standards created by revised Title 24 Codes and Standards, renewable electricity goals, the decline in commercial and industrial demand, and conservation savings linked to Advanced Metering Infrastructure (AMI). Thus, with the natural gas consumption becoming more efficient and decreasing, the SoCalGas's projection for natural gas also decreases. Interstate pipeline delivery capability into SoCalGas on any given day is theoretically approximately 6,665 million cf/day based on the Federal Energy Regulatory Commission (FERC) Certificate Capacity or SoCalGas's estimated physical capacity of upstream pipelines. SoCalGas's storage fields attain a combined theoretical storage working inventory capacity of 137.1 billion cubic feet; of that, 112.5 billion cubic feet is allocated to residential, small industrial and commercial customers.[60] The natural gas demand associated with the Project's operational activities were quantified based on the CalEEMod emissions model run for the Project's operational annual emissions contained in Appendix D, GHG Emissions Calculations Worksheets, and are discussed below.

As discussed above, the Project would be required to comply with energy conservation standards pursuant to Title 24 of the California Administrative. The Project would also be required to comply with the LA Green Building Code. The LA Green Building Code, effective January 1, 2020,

[60] *California Gas and Electric Utilities, 2018 California Gas Report, website: https://www.socalgas.com/regulatory/documents/cgr/2018_California_Gas_Report.pdf, accessed August 2020.*

requires the use of numerous conservation measures, beyond those required by Title 24 of the California Administrative Code. The LA Green Building Code contains both mandatory and voluntary green building measures to conserve energy. For example, energy performance standards in non-residential buildings require natural gas service water heaters to meet a 95% thermal efficiency. The cool roof standards and water conservation features would further reduce demands upon building heating and cooling. Therefore, compliance with Title 24 of the California Administrative Code and the LA Green Building Code would reduce the Project's energy consumption.

The operational natural gas demands for the Project were quantified based on the operation of a 14-story commercial building with approximately 188,954 square feet of floor area comprised of 184,629 square feet of office uses and approximately 4,325 square feet of ground floor commercial uses and two levels of subterranean parking. As shown in Table 4.13, below, the Project would generate a net increase in natural gas demand of approximately 2,777,515 kBTU/yr or approximately 2,721,965 cf/yr. The total natural gas demand on the Project Site with operation of the 640 S. Santa Fe Avenue building and the Project would result in a demand for approximately 5,067,260 cf of natural gas per year, which would represent a very small fraction of one percent of the SoCalGas's existing natural gas storage capacity and therefore, would be within the SoCalGas's existing natural gas storage capacity of 112.5 billion cubic feet as of 2018. Compliance with Title 24 of the California Administrative Code and the LA Green Building Code would increase energy efficiency in the building and would ensure the Project would not result in wasteful, inefficient or unnecessary consumption of natural gas.

Table 4.13
Project Natural Gas Demand

Land Use	Size (sf)	Total Natural Gas Demand (kBTU/yr) [a]	Total Natural Gas Demand (cf/yr) [b]
655 Mesquit Street Project			
Office	184,656	1,792,490	1,756,640
Commercial	4,325	985,025	965,325
Total Project Natural Gas Demand:		**2,777,515**	**2,721,965**
Plus Existing Natural Gas Demand:		*2,393,158*	*2,345,295*
Total Project Site Natural Gas Demand:		**5,170,673**	**5,067,260**

Notes: sf =square feet; kBTU = British Thermal Units; cf = cubic feet
[a] 1kBTU is equivalent to approximately 0.98 cubic feet of natural gas.
[b] See Appendix D, Greenhouse Gas Emissions Calculations Worksheets, to this IS/MND.
Source: Parker Environmental Consultants, 2021.

Fossil Fuel

Operation of the Project would generate vehicle trips associated with people driving to the Project Site for work or home and driving to and from work and other destinations throughout the region. The Project Site is located in the Central City North area, which is highly connected to the regional transit network in the Los Angeles area, especially the Downtown Los Angeles area. Public transportation within the Project Site consists primarily of multiple-stop, local-serving bus lines that provide access to shopping, business, and entertainment destinations in the Project vicinity,

although some regional/commuter public transit opportunities, including nearby railways, are also present. The bus service in the Project vicinity is operated primarily by the Los Angeles County Metropolitan Transportation Authority ("Metro"). Specifically, a total of four bus lines serve the Project Site, including Metro Local lines 18, 60, 62; and Metro Rapid Lines 720 and 760. The Los Angeles Department of Transportation ("LADOT") provides the DASH Downtown A bus line that serves the nearby Project Site area. These bus lines have stops located within convenient walking distance of the Project Site along 6th Street, 7th Street, Santa Fe Avenue, and other nearby streets with some lines with headways of 15 minutes or less (see Figure 3.1, above). Additionally, the regional bus service, Greyhound Lines, Inc., serves the nearby Project Area and has a station located 0.35 mi southwest of the Project Site. Additionally, while some bus lines and/or other transit services in the general Project vicinity are considered to be too distant from the Project Site (generally, more than one-half mile) to be used directly, these services can be accessed via connections to or transfers from the site-serving lines to provide access for Project visitors, employees, and patrons between the Project Site and the larger regional area. Due to its proximity to the bus lines aforementioned, the Project Site is easily accessible and highly connected with the City of Los Angeles and the greater Los Angeles area.

Additionally, as an infill development, the Project would incorporate retail, commercial, and restaurant uses. Because of the Project Site's location near transit service, a number of trips would be expected to be transit or walk trips rather than vehicle trips. Some employees and/or visitors would take transit to their destinations or would walk to destinations nearby. As discussed in the Transportation Assessment Study (see Appendix H of this IS/MND), some of the trips might be expected to be walk-ins either from the Project or the surrounding area. Certain adjustments to the trip generation were therefore made, with LADOT approval, to reflect these conditions. Additionally, the Project would implement a TDM Program consisting of a price workplace parking, transit promotions and marketing, ride share program, and on-site bicycle parking infrastructure, which would further reduce daily trips and VMT (See Mitigation Measure MM-TR-1). Thus, the reduction in vehicle trips and VMT would therefore decrease the Project's reliance on fossil fuels.

The fuel demand associated with the Project's operational activities were quantified based on the CalEEMod modeling worksheets presented in Appendix D of this IS/MND, GHG Emissions Calculations Worksheets, and is discussed in further detail below.

The operational fuel demand for the Project was quantified based on the operation of a 14-story mixed-use commercial building with approximately 188,954 square feet of floor area comprised of 184,629 square feet of office uses and approximately 4,325 square feet of ground floor commercial uses and two levels of subterranean parking. Based on the CalEEMod modeling worksheets presented in Appendix D of this IS/MND, GHG Emissions Modeling Worksheets, the Project would generate approximately 5,649,222 VMT on an annual basis. Based on this estimate, and CARB's emission inventories of on-road mobile sources (EMFAC2017) to estimate diesel and gasoline based VMT, it was further calculated that the Project would result in an annual net additional fuel usage of 221,019 gallons of transportation-related fuel including 35,308 gallons of diesel fuel and 185,711 gallons of gasoline fuel. (See Table 4.14, below.)

Table 4.14
Project Transportation Fuel Demand

	Annual VMTs (miles) [a]	Fuel Rate (mpg) [b]	Total Fuel Demand (gallons/year)
Diesel	395,456	11.20	35,308
Gasoline	5,253,776	28.29	185,711
Total Project Fuel Consumption (Gas and Diesel):			**221,019**
Plus Existing Fuel Consumption (Gas and Diesel)			163,635
Total Project Site Fuel Consumption (Gas and Diesel)			**384,654**

Notes: VMTs = vehicle miles traveled; mpg = miles per gallon

[a] *The Project's annual VMTs for gas and diesel powered vehicles were derived by multiplying the Project's total VMTs by the regional fleet mix for the SCAQMD Air Basin per the CARB's EMFAC 2017 database. Calculations are provided in Appendix B, Energy Demand Worksheets.*

[b] *The average fuel rate for gas and diesel engines were derived by the EMFAC2017 database for the Project's first operational year (2025). See Appendix B, Energy Demand Worksheets. Parker Environmental Consultants, 2021.*

The total fuel consumption on the Project Site with operation of the 640 S. Santa Fe Avenue building and the Project would be 384,654 gallons per year.

Conclusion

The Project's demands on electricity, natural gas, and transportation energy would not significantly affect local and regional supplies and infrastructure. Additionally, the Project would comply with all energy conservation standards applicable to the Project. Therefore, the Project would not cause wasteful, inefficient, and unnecessary consumption of energy during the construction and operation, and impacts with respect to energy consumption would be less than significant.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less Than Significant Impact. A significant impact could occur if the Project has the potential to conflict with or obstruct a state or local plan for renewable energy or energy efficiency. With respect to renewable energy, all of the Project's energy demands will be served by the City of Los Angeles Department of Water and Power ("LADWP"). Starting in 2017, the City's Power Integrated Resource Plan ("IRP") was expanded into the Power Strategic Long-Term Resource Plan ("SLTRP"), which will increase the planning horizon, from 20 years, ending in 2037, through 2050, in order to better align with Statewide greenhouse gas emissions goals and align with Los Angeles' 100% clean energy initiative. The LADWP's 2017 Power Strategic Long-Term Resource Plan ("2017 SLTRP") document serves as a comprehensive 20-year roadmap that guides the LADWP Power System in its efforts to supply reliable electricity in an environmentally responsible and cost-effective manner. The goal of the 2017 SLTRP is to identify a portfolio of generation resources and Power System assets that meets the City's future energy needs at the lowest cost and risk consistent with LADWP's environmental priorities and reliability standards. The 2017 SLTRP re-examines and expands its analysis on the 2016 IRP resource cases with updates in line with latest regulatory framework, and updates to case scenario assumptions that include a

65 percent Renewable Portfolio Standard ("RPS"), advanced energy efficiency, and higher levels of local solar, energy storage, and transportation electrification. As the Project would derive its electricity from the LADWP, the Project's energy demands will primarily be derived from renewable energy sources.

With respect to energy efficiency, the Project would be required to comply with the LA Green Building Code. The LA Green Building Code, effective January 1, 2020, requires the use of numerous conservation measures, beyond those required by Title 24 of the California Administrative Code. The LA Green Building Code contains both mandatory and voluntary green building measures to conserve energy. Among many requirements, the Project will comply with the LA Green Building Code requirement that projects comply with the following requirements related to water efficiency, solid waste reduction, and electric vehicle supply equipment:

> Solid Waste Reduction. LA Green Building Code Section 5.408.1 and LAMC Section 66.32 require the construction contractor to obtain an AB 939 Compliance Permit certifying the delivery of the construction and demolition waste to a certified construction and demolition waste processing facility. Diversion efforts would be accomplished through source reduction, recycling, and composting. Finally, the Project is required by the California Solid Waste Reuse and Recycling Access Act of 1991 to provide adequate storage areas for collection and storage of recyclable waste materials. As such, a 50 percent reduction of a Project's waste stream to the local landfill would reduce methane emissions and thus lower the Project's contribution to global GHG emissions.
>
> Water Conservation. As mandated by the LA Green Building Code, the Project would be required to provide separate submeters for individual leased, rented or other tenant spaces projected to consume more than 100 gallons per day and any building or addition that is projected to consume more than 1,000 gallons per day. Plumbing fixtures would need to comply with one of the following: (1) a 20% reduction in the building's "water use baseline" as demonstrated in Table 5.303.2.2 of the Los Angeles Plumbing Code; or (2) comply with the maximum flow rates shown in Table 5.303.2.3 of the Plumbing Code. The Project would also be required to develop a water budget for landscape irrigation use and install automatic irrigation systems with weather or soil moisture-based controllers.

On a project specific level, the Project includes the following features, which will further reduce energy demands:

1. *Proximity to mass transit:* The Project Site is located within ½ mile of multiple bus routes with peak commute service intervals of 15 minutes or less.

2. *In-Fill Smart Growth:* The Project is located on an existing infill site that is currently developed as a surface parking lot for the adjacent four-story mixed-use office and ground floor commercial building. The Project Site is located in a highly developed area of Los Angeles. The Project Site is also located in an area that is adequately served by existing infrastructure and would not require the extension of utilities or roads to accommodate the proposed development.

3. *Trip Reduction:* The Project would also provide on-site bicycle parking in bicycle storage spaces pursuant to the City of Los Angeles Bicycle Ordinance (Ord. 185,480). Pursuant to LAMC Section 12.21 A.16, the Project is required to supply 19 short-term bicycle parking spaces and 37 long-term bicycle parking spaces. The Project would provide 51 short-term bicycle parking spaces and 95 long-term bicycle parking spaces, for a total of 146 bicycle parking spaces.

4. *Resource Conservation:* As mandated by the LA Green Building Code, the Project would be required to meet Title 24 2019 standards and include ENERGY STAR-rated appliances. The Project would incorporate energy conservation features in the proposed hotel guest rooms such as low-flow water fixtures and energy conservation appliances.

Conclusion

With incorporation of the features identified above, the Project would not result in any significant environmental effects with respect to renewable energy. The Project would be required to comply with the 2019 CALGreen Code, 2019 Title 24 standards, and the LA Green Building Code standards. Compliance with State and local energy efficiency standards would ensure the Project meets all applicable energy conservation policies and regulations. As such, the Project would not conflict with any adopted energy conservation plans, and impacts would be less than significant.

Mitigation Measures

Project impacts with regard to energy use would be less than significant. Therefore, no mitigation measures are required.

Cumulative Impacts

Less Than Significant Impact. Development of the Project in conjunction with the related projects within the City of Los Angeles would further increase demand for electricity, natural, and fossil fuels.

Electricity

The Project and related projects would further increase demand for electricity service provided by LADWP. As discussed above, the LADWP's 2017 Power Strategic Long-Term Resource Plan ("2017 SLTRP") document serves as a comprehensive 20-year plan to supply reliable electricity to the City of Los Angeles in an environmentally responsible and cost-effective manner. The 2017 SLTRP considers a 20-year planning horizon to guide LADWP as it executes major new and replacement projects and programs. Based on the projections and strategies within the 2017 SLTRP, energy efficiency and solar savings are expected to increase in the future and significantly reduce electricity demands. Therefore, LADWP anticipates that it can meet the future demands of cumulative growth within its service area with the implementation of regulatory and reliability initiatives and strategic initiatives. LADWP will continue to pursue and implement energy efficiency programs per SB 350, which has an adopted goal of achieving 50 percent renewable energy sources by 2030. Furthermore, in accordance with current building codes and construction standards, each of the related projects would be required to comply with the energy conservation

standards established in Title 24 of the California Administrative Code and the City of Los Angeles Green Building Code (LAMC Chapter IX, Article 9). Compliance with Title 24 energy conservation standards, City of Los Angeles Green Building Code, and other energy conservation programs on the local level will further reduce cumulative energy demands. Cumulative impacts to electricity service would therefore be less than significant.

Natural Gas

Development of the Project in conjunction with the related projects would further increase regional demands for natural gas resources. As mentioned above, SoCalGas allocated approximately 112.5 billion cubic feet to residential, small industrial and commercial customers. As a public utility provider, SoCalGas continuously analyzes increases in natural gas demands resulting from projected population and employment growth in its service area and it is anticipated that it would be able to meet the needs of future development within the region. Additionally, compliance with energy conservation standards pursuant to Title 24 of the California Administrative Code and LA Green Building Code would reduce cumulative demands for natural gas resources. Each of the related projects would be reviewed on a case-by-case basis to determine SoCalGas's ability to serve each related project. As such, it is anticipated the related projects and the Project would be accommodated by SoCalGas. Cumulative impacts upon natural gas resources and infrastructure would therefore be less than significant.

Fossil Fuels

The Project and related projects would cumulatively increase the demand for transportation energy. The Department of Transportation's National Highway Traffic Safety Administration ("NHTSA") and CARB have implemented several policies, rules, and regulations to improve vehicle efficiency, increase the use of alternative fuels, and decrease the reliance on fossil fuels. It is anticipated that the future Project-related and related projects' vehicle trips are expected to comply with CAFE standards and CARB's Advanced Clean Cars Program, which would ultimately reduce non-renewable transportation fuel consumption. Additionally, a majority of the related projects are located within ½ mile of numerous bus routes with peak commute service intervals of 15 minutes or less. Therefore, the related projects' locations would promote other modes of transportation such as walking, biking, and public transit options. As such, the Project and future related projects would be expected to cumulatively reduce consumption in transportation energy, and therefore be less than significant.

Mitigation Measures

Cumulative impacts with regard to energy use would be less than significant. Therefore, no mitigation measures are required.

VII. Geology and Soils

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause 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 that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

The following section summarizes and incorporates by reference information from the Updated Geotechnical Design Report, Proposed Office Building, 640 South Santa Fe Avenue, Los Angeles, California, prepared by Leighton Consulting Inc., dated July 16, 2019 ("Geotechnical Report"). The Geotechnical Report and LADBS Soils Report Approval Letter (dated August 13,

2019) are included in Appendix C to this IS/MND. Appendix C also includes an Addendum Letter to the Geotechnical Design Report (dated August 26, 2019) and the LADBS Soils Report Approval Letter for the Addendum Report (dated September 18, 2019). It is important to note that while the Geotechnical Report was analyzed and completed for the Class 32 Categorical Exemption (Case No. ENV-2016-3860-CE) for the previously constructed 640 S. Santa Fe Avenue building, including two levels of subterranean parking on the western portion of the Project Site, the Geotechnical Report addresses the geological and geotechnical conditions of the entire Project Site, which includes the Development Site of the Project and is therefore applicable to the entire Project Site. A subsequent Soils Report will be submitted to the LADBS to address the structural foundation design requirements of the proposed 655 Mesquit Street Project.

Regulatory Setting

Alquist-Priolo Earthquake Fault Zoning Act

California's Alquist-Priolo Earthquake Fault Zoning Act (Public Resources Code § 2621 et seq.), originally enacted in 1972 as the Alquist-Priolo Special Studies Zone Act and renamed in 1994, is intended to reduce the risk of life and property from surface fault rupture during earthquakes. The Alquist-Priolo Act prohibits the location of most types of structures intended for human occupancy across the traces of active faults and strictly regulates construction in the corridors along active faults (Earthquake Fault Zone). It also defines criteria for identifying active faults, giving legal weight to terms such as "active," and establishes a process for reviewing building proposals in and adjacent to Earthquake Fault Zones. Under the Alquist-Priolo Act, fault zones are defined, and construction along or across them is strictly regulated if they are "sufficiently active" and "well-defined." A fault is considered sufficiently active if one or more of its segments or strands shows evidence of surface displacement during Holocene time (defined for the purposes of the Act as within the last 11,000 years). A fault is considered well-defined if its trace can be clearly identified by a trained geologist at the ground surface or in the shallow subsurface, using standard professional techniques, criteria, and judgment.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act of 1990 (Public Resources Code [PRC] Sections 2690-2699.6) is intended to reduce the damage resulting from earthquakes. While the Alquist-Priolo Act addresses surface fault rupture, the Seismic Hazards Mapping Act addresses other earthquake-related hazards, including strong ground shaking, liquefaction, and seismically induced landslides. Its provisions are similar in concept to those of the Alquist-Priolo Act; the State is charged with identifying and mapping areas at risk of strong ground shaking, liquefaction, landslides, and other corollary hazards; and cities and counties are required to regulate development within mapped Seismic Hazard Zones.

Under the Seismic Hazards Mapping Act, permit review is the primary mechanism for local regulation of development. Specifically, cities and counties are prohibited from issuing development permits for sites in Seismic Hazard Zones until appropriate site-specific geologic or geotechnical investigations have been carried out, and measures to reduce potential damage have been incorporated into the development plans.

California Building Standards Code

The State of California's minimum standards for structural design and construction are provided in the California Building Standards Code (CBSC) (California Code of Regulations Title 24). The CBSC is based on the International Building Code (IBC), which was developed by the International Code Council (ICC) and first published in 1997. The IBC is used widely throughout the United States (generally adopted on a state-by-state or district-by-district basis) and has been modified for California conditions with numerous, more detailed or more stringent regulations. The CBSC requires that "classification of the soil at each building site will be determined when required by the building official" and that "the classification will be based on observation and any necessary test of the materials disclosed by borings or excavations." In addition, the CBSC states that "the soil classification and design-bearing capacity will be shown in the building plans, unless the foundation conforms to specified requirements." The CBSC provides standards for various aspects of construction, including but not limited to: excavation, grading, and earthwork construction; fills and embankments; expansive soils; foundation investigations; and liquefaction potential and soil strength loss. The 2019 edition of the CBSC, which became effective on January 1, 2020 incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and provide for the latest in earthquake safety. In accordance with California law, the Project would be required to comply with all provisions of the CBSC.

City of Los Angeles General Plan Safety Element

The City's Safety Element provides a contextual framework for understanding the relationship between hazard mitigation, response to a natural disaster, and initial recovery from a natural disaster. The Safety Element outlines the historic evolution in Los Angeles of local, state, and federal roles, particularly relative to mitigation of and response to natural disasters.

The Safety Element emphasizes seismic safety issues because seismic events present the most widespread threat of devastation to life and property. The City adopted a series of ordinances, which required retrofitting of certain existing structures and for new construction, as well as for the evaluation of structures by a structural engineer during the construction process. The Northridge earthquake underscored the need for thorough, on-going building inspections to assure construction of buildings according to City of Los Angeles Building Code.

PRC Code Section 2699 requires that a safety element "take into account" available seismic hazard maps prepared by the State Geologist pursuant to the Alquist-Priolo Earthquake Fault Zoning Act of 1972, subsequently amended (PRC Sections 2621-2630, originally known as the Alquist-Priolo Special Studies Zones Act) and the Seismic Hazard Mapping Act of 1990, subsequently amended (PRC Sections 2690-2699.6 and 3720-3725). The Hazard Mapping Act requires the State Geologist to map areas subject to amplified ground shaking (or conditions which have potential for amplified ground shaking), liquefaction, and landslide hazard areas.

Los Angeles Building Code

Earthwork activities, including grading, are governed by the Los Angeles Building Code, which is contained in Los Angeles Municipal Code (LAMC), Chapter IX, Article 1. Specifically, Section 91.7006.7 includes requirements regarding import and export of material; Section 91.7010

includes regulations pertaining to excavations; Section 91.7011 includes requirements for fill materials; Section 91.7013 includes regulations pertaining to erosion control and drainage devices; Section 91.7014 includes general construction requirements as well as requirements regarding flood and mudflow protection; and Section 91.7016 includes regulations for areas that are subject to slides and unstable soils. Additionally, Section 91.1803 includes specific requirements addressing seismic design, grading, foundation design, geologic investigations and reports, soil and rock testing, and groundwater. As noted above, the Los Angeles Building Code incorporates by reference the California Building Code, with City amendments for additional requirements. The Los Angeles Department of Building and Safety (LADBS) is responsible for implementing the provisions of the Los Angeles Building Code.

Paleontological Resources

PRC Section 5097.5 specifies that any unauthorized removal of paleontological remains is a misdemeanor. Further, California Penal Code Section 622.5 sets the penalties for the unlawful damage or removal of paleontological resources. State regulations mandate protection of paleontological resources on public lands, and CEQA requires evaluation of impacts to paleontological sites. Paleontological resources are also subject to certain state regulations for historical resources.

a) Directly or indirectly cause 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.

Less Than Significant Impact. A significant impact may occur if a project site is located within a State-designated Alquist-Priolo Zone or other designated fault zone. The Geotechnical Report concluded that the Project Site is not within a state-designated Alquist-Priolo Earthquake Fault Zone. No active or potentially active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site. Therefore, the potential for surface rupture due to faulting occurring beneath the site during the design life of the Project is considered low and a surface fault rupture hazard evaluation is not mandated. The closest active faults to the Project Site are the Elysian Park fault, Puente Hills fault, and Hollywood fault, located approximately 3.3 miles north, 5.8 miles south, and 9.1 miles northwest from the Project Site, respectively. Additionally, according to the California Department of Conservation's California Earthquake Hazards Zone Application ("EQ Zapp"), the Project Site does not lie within any of the State Geologist's mapped earthquake hazard zones for a fault zone, liquefaction zone, or landslide zone.[61]

The Project Site could be subjected to strong ground shaking in the event of an earthquake. However, this hazard is common in Southern California and the effects of ground shaking can be mitigated if the proposed structures are designed and constructed in conformance with current building codes and engineering practices. Based on these considerations, the Project Site is

[61] *California Department of Conservation, EQ Zapp: California Earthquake Hazards Zone Application, website: https://maps.conservation.ca.gov/cgs/EQZApp/app/, last updated April 4, 2019; accessed November 2020.*

considered suitable for the construction of the Project, provided that the recommendations specified in the Geotechnical Report are included in the design and construction of the Project to the satisfaction of the Department of Building and Safety. Sign off from the Department of Building and Safety would ensure that the Project meets the applicable performance measures. Accordingly, with the design and construction of the Project in conformance with the California Building Code seismic standards and approval by the Department of Building and Safety, impacts associated with seismic hazards would be less than significant. Therefore, the Project would not expose people or structures to substantial adverse effects associated with fault rupture, caused in whole or in part by the Project's exacerbation of the existing environmental conditions. The Project would not expose people or structures to substantial adverse effects associated with fault rupture, and would not cause or exacerbate seismic conditions on the Project Site. Therefore, impacts will be less than significant.

ii) Strong seismic ground shaking?

Less Than Significant Impact. A significant impact may occur if a project represents an increased risk to public safety or destruction of property by exacerbating existing hazardous environmental conditions by exposing people, property, or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with other locations in Southern California. As discussed above, the Geotechnical Report concluded that the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone or located in an area mapped by the State Geologist for fault zones, liquefaction zones, or landslide zones. However, the nearest earthquake fault, the Elysian Park fault is located approximately 3.3 miles to the north. Therefore, the Project Site is located in the seismically active Southern California region and could be subjected to moderate to strong ground shaking in the event of an earthquake on one of the many active Southern California faults. However, this hazard is common in Southern California and the effects of ground shaking can be mitigated if the proposed structures are designed and constructed in conformance with current building codes and engineering practices.

The Geotechnical Report concluded that there was no evidence of adverse geological or geotechnical hazards at the Project Site that would preclude the development of the 640 S. Santa Fe Avenue Project, provided the recommendations presented in the Geotechnical Report are followed and implemented during design and construction. The 640 S. Santa Fe Avenue building has since been constructed and is currently operational. Future development for the Project would also comply with the Geotechnical Report recommendations of the LADBS. Additionally, the Project would be required to comply with current engineering standards, the seismic safety requirements set forth in the Earthquake Regulation of the City of Los Angeles Building Code ("LABC"), the LAMC, and the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the Project, as it may be subsequently amended or modified. Therefore, with compliance with applicable regulations and implementation of the recommendations in the Geotechnical Report and the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter would be implemented for the Project, construction and operation of the Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard with respect to strong seismic ground shaking. Therefore, the Project impacts related to seismic ground shaking would be less than significant.

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. A significant impact may occur if a project site is located within a liquefaction zone. Liquefaction is a phenomenon in which loose, saturated, relatively cohesionless soil deposits lose shear strength during strong ground motions. Primary factors controlling liquefaction include intensity and duration of ground motion, gradation characteristics of the subsurface soils, in-situ stress conditions, and the depth to groundwater. Liquefaction is typified by a loss of shear strength in the liquefied layers due to rapid increases in pore water pressure generated by earthquake accelerations. The current standard of practice, as outlined in the "Recommended Procedures for Implementation of DMG Special Publication 117, Guidelines for Analyzing and Mitigating Liquefaction in California" and "Special Publication 117A, Guidelines for Evaluating and Mitigating Seismic Hazards in California" require liquefaction analysis to a depth of 50 feet below the lowest portion of the proposed structure. Liquefaction typically occurs in areas where the soils below the water table are composed of poorly consolidated, fine to medium-grained, primarily sandy soil. In addition to the requisite soil conditions, the ground acceleration and duration of the earthquake must also be of a sufficient level to induce liquefaction.

The Project Site is located in an area identified as not having a potential for liquefaction on the California Department of Conservation's EQ Zapp.[62] Additionally, according to the City of Los Angeles Safety Element, the Project Site is identified as being within an area that is not susceptible to liquefaction. Further, the Geotechnical Report found that the Project Site is not located within an area shown as susceptible to liquefaction on the California Seismic Hazard Zones Map for the Los Angeles Quadrangle. The Project Site is considered to be suitable for the proposed construction from a geotechnical engineering standpoint, provided that the recommendations specified in the Geotechnical Report are included in the design and construction of the Project to the satisfaction of the Department of Building and Safety. The Project shall also comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the Project, and as it may be subsequently amended or modified. Therefore, the Project's impacts related to seismic-related ground failure, including liquefaction, would be less than significant.

iv) Landslides?

No Impact. A project-related significant adverse effect may occur if the project is located in a hillside area with soil conditions that would suggest a high potential for sliding. The Project Site is not located within the City of Los Angeles Hillside Grading Area and not within a Hillside Ordinance Area. Additionally, the Project Site is not within an area identified as having potential for slope instability according to the City's Safety Element. According to the Geotechnical Report, the Project Site is located on relatively level ground, and based on the State of California Seismic Hazard Zones Map for the Los Angeles Quadrangle, the Project Site is not located within an area that has been identified by the State of California as being potentially susceptible to seismically-induced landslides. As such, the potential for slope stability hazards to adversely affect the Project is considered low, and no impact related to landslides will occur.

[62] *Ibid.*

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

Less Than Significant Impact. A project would normally have significant sedimentation or erosion impact if it would: (a) constitute a geologic hazard to other properties by causing or accelerating instability from erosion; or (b) accelerate natural processes of wind and water erosion and sedimentation, resulting in sediment runoff or deposition which would not be contained or controlled on-site. Although development of the Project has the potential to result in the erosion of soils during site preparation and construction activities, erosion would be reduced by implementation of stringent erosion controls imposed by the City of Los Angeles though grading and building permit regulations. Minor amounts of erosion and siltation could occur during grading.

The potential for soil erosion during the ongoing operation of the Project is extremely low due to the generally level topography of the Project Site, and the fact that the Project Site would be mostly paved-over or built upon, so little soil would be exposed. The Project would also be required to implement BMPs to prevent the transport of sediments from stormwater runoff from the Development Site, per CALGreen Section 5.106.1.2. As such, the implementation of BMPs required by CALGreen Section 5.106.1.2, would ensure that the Project's construction-related soil erosion impacts would be less than significant.

Further, the Geotechnical Report provided recommendations regarding temporary excavations and temporary shoring during construction of the 640 S. Santa Fe Avenue Project. As stated previously, the Project would also comply with the recommendations of the Geotechnical Report. All grading activities require grading permits from the Department of Building and Safety, which include requirements and standards designed to limit potential impacts to acceptable levels. In addition, all on-site grading and site preparation would also comply with applicable provisions of Chapter IX, Division 70 of the LAMC, which addresses grading, excavations, and fills.

With incorporation of the recommendations provided in the Geotechnical Report and compliance with the conditions included in the LADBS Soils Report Approval Letters, Project impacts associated with soil erosion and loss of topsoil would be less than significant.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Less Than Significant Impact. A project would normally have a significant geologic hazard impact if it could cause or accelerate geologic hazards causing substantial damage to structures or infrastructure or expose people to substantial risk of injury. As concluded in the Updated Geotechnical Design Report, the potential hazards associated with liquefaction are low. Lateral spreading and collapse are types of liquefaction-induced ground failures. Since the potential for liquefaction is low, the potential for lateral spreading or collapse on the Project Site are also low. Additionally, as discussed above, the probability of seismically induced landslides occurring on the Project Site is considered low due to the general lack of elevation difference across or adjacent to the Project Site. The Geotechnical Report found that the Project Site is not located within an area of known ground subsidence, and there appears to be little or no potential for ground subsidence due to withdrawal of water or petroleum at the Project Site. Therefore, the Project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading,

subsidence, liquefaction, or collapse, and the impacts will be less than significant.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Less Than Significant Impact. 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 buildings, thus posing a hazard to life and property. Expansive soils contain significant amounts of clay particles that swell considerably when wetted and which shrink when dried. Foundations constructed on these soils are subject to uplifting forces caused by the swelling. Without proper design measures, heaving and cracking of both building foundations and slabs-on-grade could result.

As discussed in the Geotechnical Report, subsurface exploration involved drilling eight boreholes at varying depths, with one to a maximum depth of approximately 81 feet below grade. The Geotechnical Report concluded that due to the predominantly granular nature of the soils encountered during site exploration, the soils are predominantly non-expansive. Therefore, with incorporation of the recommendations provided in the Geotechnical Report and compliance with the Building Code requirements from LADBS, impacts related to expansive soils would be less than significant.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. This question would apply to the Project only if it was located in an area not served by an existing sewer system. The Project Site is located in a developed area of the City of Los Angeles, which is served by a wastewater collection, conveyance and treatment system operated by the City of Los Angeles. No septic tanks or alternative disposal systems neither are necessary, nor are they proposed. As such, no impacts related to alternative wastewater disposal systems will occur.

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

Less Than Significant Impact. A significant impact may occur if grading or excavation activities associated with the Project were to disturb paleontological resources or geologic features which presently exist within the Project Site. The Project Site has been previously graded and developed. The western half of the Project Site was recently excavated to a depth of approximately 25 feet below grade for the construction site for the 640 S. Santa Fe Avenue Project, an approved four-story mixed-use office and ground floor commercial building with two levels of below grade parking.

The Los Angeles General Plan Framework EIR Cultural Resources Section was used to determine whether any known paleontological resources exist on-site or in close proximity to the Project Site. The Framework EIR Cultural Resources Section compiled both archaeological and paleontological information and data gathered from the Natural History Museum of Los Angeles County, the California Archaeological Inventory – Regional Information Center, and the City of Los Angeles Cultural Affairs Department. Two maps in the Framework EIR Cultural Resources

Section show the known areas of paleontological resources within the City of Los Angeles. Figure CR-2 shows the locations of vertebrate paleontological resources in the City and Figure CR-3 shows the locations of invertebrate paleontological resources in the City. As shown in Figure CR-2, no known vertebrate paleontological resources were identified on the Development Site of the Project.[63] Figure CR-3 categorizes the sedimentology of the Development Site as "surface sediments with unknown fossil potential."[64] Further, based on correspondence received from the Natural History Museum of Los Angeles County dated November 27, 2020 (contained in Appendix I to this IS/MND), it was confirmed that no known fossil localities lie directly within the Project Site boundaries. There are, however, known fossil localities nearby from the same sedimentary deposits that occur in the Project Site area at various depths. The closest localities cited in the Natural History Museum's letter were over 1.3 miles west of the Project Site, in an area bounded by 7th Street to the south, Spring Street to the east, 3rd Street to the north, and Flower Street to the west.

Although no known paleontological resources exist on-site, the Project would include two levels of subterranean parking, and the proposed building itself would require excavation to ensure the proper base and slope for its foundation. This would require a depth of excavation of approximately 32 feet below grade level. Due to the fact that half of the Project Site was recently excavated to a depth of approximately 32 feet below grade without encountering any fossils or paleontological resources, there is low potential for unknown vertebrate and invertebrate fossils to be encountered during construction of the Project. Nevertheless, if paleontological resources are discovered during excavation, grading, or construction, in accordance with standard permit conditions LADBS shall be notified immediately, and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. Construction activity may continue unimpeded on other portions of the Project Site. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. The found deposits would be treated in accordance with federal, State, and local guidelines. With adherence to all applicable laws and conditions of approval, impacts upon paleontological resources would be reduced to less than significant levels.

Mitigation Measures

Project impacts with regard to geology and soils would be less than significant. Therefore, no mitigation measures are required.

Cumulative Impacts

Less Than Significant Impact. Geotechnical hazards are site-specific and there is little, if any, cumulative geological relationship between the Project and related projects in the project area. Similar to the Project, potential impacts related to geology and soils would be assessed on a case-

[63] *City of Los Angeles Department of City Planning, Framework Element Final Environmental Impact Report, Section 2.15 Cultural Resources, Figure CR-2: Vertebrate Paleontological Resources in the City of Los Angeles, 2001.*

[64] *City of Los Angeles Department of City Planning, Framework Element Final Environmental Impact Report, Section 2.15 Cultural Resources, Figure CR-3: Invertebrate Paleontological Resource Sensitivity Areas in the City of Los Angeles, 2001.*

by-case basis and, if necessary, the applicants of the related projects would be required to implement applicable regulatory compliance measures and any required mitigation measures. Furthermore, the analysis of the Project's geology and soils impacts concluded that, through the implementation of the regulatory compliance measures recommended above, Project impacts would be less than significant. Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative geology and soil impacts would be less than significant.

Mitigation Measures

Cumulative impacts with regard to geology and soils would be less than significant. Therefore, no mitigation measures are required.

VIII. Greenhouse Gas Emissions

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

Greenhouse gas (GHG) emissions refer to a group of emissions that have the potential to trap heat in the atmosphere and consequently affect global climate conditions. Scientific studies have concluded that there is a direct link between increased emission of GHGs and long-term global temperature. The principal GHGs are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), sulfur hexafluoride (SF_6), perfluorocarbons (PFCs), hydrofluorocarbons (HFCs), nitrogen trifluoride (NF_3), and water vapor (H_2O). CO_2 is the reference gas for climate change because it is the predominant greenhouse gas emitted. To account for the varying warming potential of different GHGs, GHG emissions are often quantified and reported as CO_2 equivalents (CO_2e).

Regulatory Setting

The United States Environmental Protection Agency (U.S. EPA) is responsible for implementing federal policy to address GHGs.

Federal Clean Air Act

In the past, the U.S. EPA has not regulated GHGs because it asserted that the Clean Air Act (CAA) did not authorize it to issue mandatory regulations to address global climate change. However, in 2007 the U.S. Supreme Court held that the U.S. EPA must consider regulation of

motor-vehicle GHG emissions.[65] The Court did not mandate that the U.S. EPA enact regulations to reduce GHG emissions but found that the only instances in which the U.S. EPA could avoid taking action were if it found that GHGs do not contribute to climate change or if it offered a "reasonable explanation" for not determining that GHGs contribute to climate change. In December 2009, the U.S. EPA issued an endangerment finding for GHGs under the CAA, concluding that GHGs threaten the public health and welfare of current and future generations and that motor vehicles contribute to GHG pollution.[66] This is the first step in regulating GHGs under the provisions of the CAA. These findings provide the basis for adopting new national regulations to mandate GHG emission reductions under the Federal Clean Air Act. The EPA's endangerment finding paves the way for Federal regulation of GHGs.

Under the Consolidated Appropriations Act of 2008 (HR 2764), Congress established mandatory GHG reporting requirements for some emitters of GHGs. In addition, on September 22, 2009, the EPA issued the Final Mandatory Reporting of Greenhouse Gases Rule. The rule requires annual reporting to the U.S. EPA of GHG emissions from large sources and suppliers of GHGs, including facilities that emit 25,000 metric tons (MT) or more a year of GHGs.

Executive Order 13432

In response to the Massachusetts v. Environmental Protection Agency ruling, the President signed Executive Order 13432 on May 14, 2007, directing the U.S. EPA, along with the Departments of Transportation, and Energy to initiate a regulatory process that responds to the Supreme Court's decision. Executive Order 13432 was codified into law by the 2009 Omnibus Appropriations Law signed on February 17, 2009. The order sets goals in the areas of energy efficiency, acquisition, renewable energy, toxics reductions, recycling, sustainable buildings, electronics stewardship, fleets, and water conservation.

Light-Duty Vehicle Greenhouse Gas and Corporate Average Fuel Economy Standards

On May 19, 2009, President Obama announced a national policy for fuel efficiency and emissions standards in the United States auto industry. The adopted federal standard applies to passenger cars and light-duty trucks for model years 2012 through 2016. The rule surpasses the prior Corporate Average Fuel Economy standards (CAFE)[67] and requires an average fuel economy standard of 35.5 miles per gallon (mpg) and 250 grams of CO_2 per mile by model year 2016, based on U.S. EPA calculation methods. These standards were formally adopted on April 1, 2010. In August 2012, standards were adopted for model year 2017 through 2025 for passenger cars and light-duty trucks. By 2025, vehicles are required to achieve 54.5 mpg (if GHG reductions are achieved exclusively through fuel economy improvements) and 163 grams of CO_2 per mile.

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[65] *Massachusetts v. Environmental Protection Agency et al. (127 S. Ct. 1438 (2007))*

[66] *United States Environmental Protection Agency, Endangerment, and Cause or Contribute Findings for Greenhouse Gases under Section 202(a) of the Clean Air Act, website: https://www.epa.gov/ghgemissions/endangerment-and-cause-or-contribute-findings-greenhouse-gases-under-section-202a-clean, accessed February 2020.*

[67] *The Corporate Average Fuel Economy standards are regulations in the United States, first enacted by Congress in 1975, to improve the average fuel economy of cars and light trucks. The U.S Department of Transportation has delegated the National Highway Traffic Safety Administration as the regulatory agency for the Corporate Average Fuel Economy standards.*

According to the U.S. EPA, a model year 2025 vehicle would emit one-half of the GHG emissions from a model year 2010 vehicle.[68] In 2017, the U.S. EPA recommended no change to the GHG standards for light-duty vehicles for model years 2022-2025.

In March 2020, the U.S. EPA and the National Highway Traffic Safety Administration (NHTSA) adopted the Safer Affordable Fuel-Efficient Vehicles Rule that maintains the CAFE and CO_2 standards applicable in model year 2020 for model years 2021 through 2026. The estimated CAFE and CO_2 standards for model year 2020 are 43.7 mpg and 204 grams of CO_2 per mile for passenger cars and 31.3 mpg and 284 grams of CO2 per mile for light trucks, projecting an overall industry average of 37 mpg, as compared to 46.7 mpg under the standards issued in 2012. The final Safer Affordable Fuel-Efficient Vehicles Rule also excludes CO_2e emission improvements associated with air conditioning refrigerants and leakage (and, optionally, offsets for nitrous oxide and methane emissions) after model year 2020.[69]

Heavy-Duty Engines and Vehicles Fuel Efficiency Standards

In addition to the regulations applicable to cars and light-duty trucks, on August 9, 2011, the U.S. EPA and the NHTSA announced Phase I fuel economy and GHG standards for medium- and heavy-duty trucks, which apply to vehicles from model years 2014 through 2018.[70] The U.S. EPA and the NHTSA adopted standards for CO_2 emissions and fuel consumption, respectively, tailored to each of three main vehicle categories: (1) combination tractors, (2) heavy-duty pickup trucks and vans, and (3) vocational vehicles. According to the U.S. EPA, this program will reduce GHG emissions and fuel consumption for affected vehicles by 6 percent to 23 percent.

Building on the Phase I standards, in August 2016, U.S. EPA and NHTSA jointly finalized Phase 2 standards for medium- and heavy-duty vehicles through model year 2027 that will improve fuel efficiency and cut carbon pollution to reduce the impacts of climate change. The final standards are expected to lower CO_2 emissions by approximately 1.1 billion metric tons; save vehicle owners fuel costs of about $170 billion; and reduce oil consumption by up to two billion barrels over the lifetime of the vehicles sold under the program.[71]

California Global Warming Solutions Act of 2006

The California Global Warming Solutions Act of 2006, widely known as AB 32, requires the California Air Resources Board ("CARB") to develop and enforce regulations for the reporting and verification of statewide GHG emissions. CARB is directed to set a statewide GHG emission limit,

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[68] *United States Environmental Protection Agency, EPA and NHTSA Set Standards to Reduce Greenhouse Gases and Improve Fuel Economy for Model Years 2017-2025 Cars and Light Trucks, August 2012.*

[69] *National Highway Traffic Safety Administration (NHTSA) and U.S. Environmental Protection Agency (USEPA), Federal Register/ Vol. 85, No 84/ Thursday, April 30, 2020 / Rules and Regulations, The Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021–2026 Passenger Cars and Light Trucks.*

[70] *United States Environmental Protection Agency, Office of Transportation and Air Quality. EPA and NHTSA Adopt First-Ever Program to Reduce Greenhouse Gas Emissions and Improve Fuel Efficiency of Medium-and Heavy-Duty Vehicles, August 2011.*

[71] *Regulations for Greenhouse Gas Emission from Commercial Trucks & Buses, November 16, 2016, website: https://19january2017snapshot.epa.gov/regulations-emissions-vehicles-and-engines/regulations-greenhouse-gas-emissions-commercial-trucks_.html.*

based on 1990 levels, to be achieved by 2020. The bill set a timeline for adopting a scoping plan for achieving GHG reductions in a technologically and economically feasible manner.

The heart of the bill is the requirement that statewide GHG emissions be reduced to 1990 levels by 2020. As previously determined by CARB, California projected it needed to reduce GHG emissions to a level approximately 28.4% below CARB's 2020 "business-as-usual" GHG emission projections (as set forth in the 2008 Scoping Plan) to achieve this goal.[72] The bill requires CARB to adopt rules and regulations in an open public process to achieve the maximum technologically feasible and cost-effective GHG reductions.

Climate Change Scoping Plan

Assembly Bill 32 (AN 32) requires CARB to update the scoping plan at least every five years. The First Update to the Scoping Plan (First Update), approved in May 2014, presented an update on the program and its progress toward meeting the 2020 limit. It also developed the first vision for the long-term progress that the State endeavors to achieve. In doing so, the First Update laid the groundwork to transition to the post-2020 goals set forth in Executive Orders S-3-05 and B-16-2012.[73] It also recommended the need for a 2030 mid-term target to establish a continuum of actions to maintain and continue reductions, rather than only focusing on targets for 2020 or 2050.

In December 2017, CARB adopted "California's 2017 Climate Change Scoping Plan" that establishes a proposed framework of action for California to meet a 40 percent reduction in greenhouse gases by 2030 compared to 1990 levels, and substantially advance toward the 2050 climate goal of 80 percent below 1990 levels. The 2017 Climate Change Scoping Plan is part of the public process to update the AB 32 Scoping Plan to reflect Governor's Executive Order B-30-15 and SB 32, which establish a mid-term GHG emission reduction target for California of 40 percent below 1990 levels by 2030. All State agencies with jurisdiction over sources of GHG emissions were directed to implement measures to achieve reductions of GHG emissions to meet the 2030 and 2050 targets. CARB and other State agencies are identifying the suite of programs, regulations, incentives, and supporting actions needed to continue driving down emissions and ensure we are on a trajectory to meet our mid- and long-term climate goals.

The 2017 Scoping Plan includes input from a range of State agencies and is the result of a two-year development process including extensive public and stakeholder outreach designed to ensure that California's climate and air quality efforts continue to improve public health and drive development of a more sustainable economy. The 2017 Scoping Plan reflects the direction from the legislature on the Cap-and-Trade Program, as described in AB 398, the need to extend the

[72] *CARB has not calculated the percent reduction required to achieve AB 32's mandate of returning to 1990 levels of GHG emissions by 2020. The value of 28.4% as the required reduction to achieve 1990 emissions in 2020 is an approximate value. Based on the Scoping Plan estimates and conservative rounding, the value could be 28.5%.*

[73] *Executive Order S-30-15 established three targets: 1) By 2010, reduce GHG emissions to 2000 levels; 2) By 2020, reduce GHG emissions to 1990 levels; 3) By 2020, reduce GHG emissions to 80 percent below 1990 levels. Executive Order B-16-2012 facilitated the commercialization of zero-emission vehicles and reestablished the 2050 target to reduce GHG emissions to 80 percent below 1990 levels.*

key existing emissions reductions programs, and acknowledges the parallel actions required under AB 617 to strengthen monitoring and reduce air pollution at the community level.

On July 11, 2018, CARB announced that GHG pollution in California fell below 1990 levels for the first time since emissions peaked in 2004. Electricity generation had the largest decline among the sectors. Emissions from this sector declined 18 percent in 2016, reflecting continued growth in renewable energy – such as solar, wind and geothermal – as a result of the state's Renewables Portfolio Standard, and a corresponding drop in natural gas generation. Solar electricity in all forms, including rooftop generation, grew 33 percent, while natural gas fell more than 15 percent.[74]

Cap-and-Trade Program

The AB 32 Scoping Plan identifies a cap-and-trade program as one of the strategies California will employ to reduce the greenhouse gas ("GHG") emissions that cause climate change. This program will help put California on the path to meet its goal of reducing GHG emissions to 1990 levels by the year 2020, and ultimately achieving an 80% reduction from 1990 levels by 2050. Additionally, SB 32 established a mid-term GHG emission reduction target for California of 40 percent below 1990 levels by 2030. Under cap-and-trade, an overall limit on GHG emissions from capped sectors will be established by the cap-and-trade program and facilities subject to the cap will be able to trade permits (allowances) to emit GHGs.

Cap-and-trade is a market-based regulation that is designed to reduce greenhouse gases ("GHGs") from multiple sources. Cap-and-trade sets a firm limit or cap on GHGs and minimizes the compliance costs of achieving AB 32 goals. The cap will decline approximately 3 percent each year beginning in 2013. Trading creates incentives to reduce GHGs below allowable levels through investments in clean technologies. With a carbon market, a price on carbon is established for GHGs. Market forces spur technological innovation and investments in clean energy. The Project would be exempt from the Cap-and-Trade program, since it only proposes office and commercial uses and does not propose any industrial or high-emitting land uses.

On July 11, 2018, CARB recently announced that greenhouse gas pollution in California fell below 1990 levels, which was the 2020 greenhouse gas emissions goal set by AB 32.[75]

Title 24 Energy Efficiency Standards

California's Energy Efficiency Standards for Residential and Nonresidential Buildings, located at Title 24, Part 6 of the California Code of Regulations and commonly referred to as "Title 24," were established in 1978 in response to a legislative mandate to reduce California's energy consumption. Although not originally intended to reduce GHG emissions, increased energy efficiency and reduced consumption of electricity, natural gas, and other fuels would result in fewer GHG emissions from residential and nonresidential buildings subject to the standards. The

[74] *Climate Pollutants Fall Below 1990 Levels For The First Time, website: https://ww2.arb.ca.gov/news/climate-pollutants-fall-below-1990-levels-first-time.*

[75] *California Air Resources Board, "Climate Pollutants Fall Below 1990 Levels for First Time" https://ww2.arb.ca.gov/news/climate-pollutants-fall-below-1990-levels-first-time, accessed April 2019.*

standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods.

The 2019 Standards went into effect on January 1, 2020, and improve upon the 2016 Standards for new construction of, and additions and alterations to, residential and nonresidential buildings. The 2019 update to the Energy Efficiency Standards for Residential and Nonresidential Buildings focuses on several key areas to improve the energy efficiency of renovations and addition to existing buildings as well as newly constructed buildings and renovations and additions to existing buildings. The most significant efficiency improvements to the residential Energy Efficiency Standards include the introduction of photovoltaic power systems into the prescriptive package and improvements for attics, walls, water heating, and lighting. The most significant efficiency improvements to the nonresidential Standards include alignment with the American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) 90.1-2017 national standards. The 2019 Energy Efficiency Standards also include changes made throughout all of its sections to improve the clarity, consistency, and readability of the regulatory language. The Energy Efficient Standards require that enforcement agencies determine compliance with CCR, Title 24, Part 6 before issuing building permits for any construction.[76]

California Green Building Standards

The California Green Building Standards Code, which is Part 11 of the California Code of Regulations, is commonly referred to as the CALGreen Code. Statewide reductions in GHG emissions from construction is being accomplished through continuous updates to the CALGreen Code and other State mandated laws and regulations. The CALGreen Code encourages sustainable construction practices in planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. The CALGreen Code provides for design options allowing the designer to determine how best to achieve compliance for a given site or building condition. The CALGreen Code also requires building commissioning which is a process for the verification that all building systems, like heating and cooling equipment and lighting systems, are functioning at their maximum efficiency. Originally adopted in 2008, the CALGreen Code included all voluntary standards that went beyond the basic building code requirements and introduced new standards for reducing water use, provisions for reducing and recycling construction and demolition waste, criteria for site development to locate buildings near public transit, and measures for improving indoor air quality to protect the health of building occupants. In 2010, the CALGreen Code became mandatory on a statewide basis.

City of Los Angeles Sustainable City pLAn/L.A's Green New Deal

On April 8, 2015, Mayor Eric Garcetti released the City of Los Angeles's first ever Sustainable City pLAn ("The pLAn"). The pLAn sets the course for a cleaner environment and a stronger economy, with commitment to equity as its foundation. The pLAn is made up of short-term (by 2017) and long-term (2025 and 2035) targets for sustainability related topics including but not

[76] *California Energy Commission, 2019 Building Energy Efficiency Standards, December 2018, https://ww2.energy.ca.gov/2018publications/CEC-400-2018-020/CEC-400-2018-020-CMF.pdf, accessed December 2020.*

limited to groundwater, water use, solar power, energy-efficiency, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality. The pLAn set out an ambitious vision for cutting greenhouse gas emissions, reducing the impact of climate change and building support for national and global initiatives with targets to achieve a 45% reduction in GHG emissions below 1990 baseline levels by 2025, a 60% reduction by 2035, and an 80% reduction by 2050. According to the 3rd Annual Report for The pLAn (2017-2018), as of 2017 the City's GHG emissions are estimated at 26.7 MMtCo2e, approximately 49 percent below 1990 levels.[77] The City has been working to increase the generation of renewable energy, improve energy conservation and efficiency, and change transportation and land use patterns to reduce dependence on automobiles.

In 2019, the Mayor's office updated the Sustainable City pLAn with the adoption of The Green New Deal Sustainable City pLAn 2019 ("L.A.'s Green New Deal"), which establishes accelerated goals for a cleaner environment and a stronger economy, with commitment to equity as its foundation. L.A.'s Green New Deal reported that in 2017 approximately 30% of the LADWP's total energy production was from renewable energy sources.[78] The Sustainable City pLAn / L.A.'s Green New Deal is guided by four key principles: (i) to uphold the Paris Climate Agreement; (ii) to deliver environmental justice and equity through an inclusive green economy; (iii) to ensure every Angeleno has the ability to join the green economy by creating pipelines to good paying, green jobs; and (iv) to lead by example within City government.

L.A's Green New Deal sets the following targets for a sustainable city:

- Supply 55% renewable energy by 2025; 80% by 2036; and 100% by 2045.
- Source 70% of water locally by 2035, and capture 150,000 acre ft/yr (AFY) of stormwater by 2035.
- Reduce building energy use per square foot for all types of buildings 22% by 2025; 34% by 2035; and 44% by 2050.
- Reduce Vehicle Miles Traveled per capita by at least 13% by 2025, 39% by 2035, and 45% by 2050.
- Ensure 57% of new housing units are built within 1,500 feet of transit by 2025; and 75% by 2035.
- Increase the percentage of zero emission vehicles in the city to 25% by 2025; 80% by 2035; and 100% by 2050.
- Create 300,000 green jobs by 2035; and 400,000 by 2050.
- Convert all city fleet vehicles to zero emission where technically feasible by 2028.

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[77] *The 1990 baseline level is 54.1 MMtCo2e. 3rd Annual Report for The pLAn (2017-2018), website: https://www.dropbox.com/home/2020%20Projects/655%20Mesquit/References/City%20Admin%20Record%20References?preview=City+of+LA_pLAn+3rd+Annual+Report_2018.pdf, accessed April 2020.*

[78] *City of Los Angeles, L.A.'s Green New Deal, Sustainable City pLAn, 2019, website: http://plan.lamayor.org/sites/default/files/pLAn_2019_final.pdf, accessed August 2020.*

Reduce municipal GHG emissions 55% by 2025 and 65% by 2035 from 2008 baseline levels, reaching carbon neutral by 2045.[79]

LA Green Building Code

The City of Los Angeles LA Green Building Code (Ordinance No. 181,480), which incorporates applicable provisions of the CALGreen Code, and in many cases outlines more stringent GHG reduction measures available to development projects in the City of Los Angeles is consistent with statewide goals and policies in place for the reduction of greenhouse gas emissions, including SB 32 and the corresponding Scoping Plan. Among the many GHG reduction measures outlined later in this Section, the LA Green Building Code requires new development projects to incorporate infrastructure to support future electric vehicle supply equipment ("EVSE"), exceed the prescriptive water conservation plumbing fixture requirements of Sections 5.303.2.2 of the California Plumbing Code by 20%, meet the requirements of the California Building Energy Efficiency Standards, and comply with the construction and demolition solid waste handling and diversion requirements mandated in Section 66.32 of the LAMC. Projects filed on or after January 1, 2020 must comply with the provisions of the 2020 Los Angeles Green Building Code. New development projects are required to comply with the LA Green Building Code. Therefore, the Project would comply with an adopted plan or regulation that was adopted in part for the purposes of reducing GHG emissions.

2020-2045 RTP/SCS ("Connect SoCal")

On September 3, 2020, SCAG's Regional Council adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy ("Connect SoCal"). In 2012, SCAG adopted the region's first Regional Transportation Plan/Sustainable Communities Strategy ("RTP/SCS") – a plan that the Regional Council now calls Connect SoCal. Connect SoCal charts a path toward a more mobile, sustainable and prosperous region by making connections between transportation networks, between planning strategies and between the people whose collaboration can improve the quality of life for Southern Californians. Connect SoCal builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern.

Connect SoCal is an important planning document for the region, allowing public agencies who implement transportation projects to do so in a coordinated manner, while qualifying for federal and state funding. Connect SoCal includes a robust financial analysis that considers operations and maintenance costs to ensure our existing transportation system's reliability, longevity, resilience, and cost effectiveness. In addition, Connect SoCal is supported by a combination of transportation and land use strategies that outline how the region can achieve California's greenhouse gas emission reduction goals and federal Clean Air Act requirements. Connect SoCal also strives to achieve broader regional objectives, such as the preservation of natural lands, improvement of public health, increased roadway safety, support for the region's vital goods movement industries, and more efficient use of resources.

[79] *Ibid.*

As part of the State's mandate to reduce per-capita GHG emissions from automobiles and light trucks, Connect SoCal presents strategies and tools that are consistent with local jurisdictions' land use policies and incorporates best practices for achieving the State-mandated reductions in GHG emissions at the regional level through reduced per-capita vehicle miles traveled ("VMT"). These strategies identify how the SCAG region can implement Connect SoCal and achieve related GHG reductions. The following strategies are intended to be supportive of implementing the regional SCS: 1) focus growth near destinations and mobility options; 2) promote diverse housing options; 3) leverage technology innovations; 4) support implementation of sustainability policies; and 5) promote a green region.

For the SCAG region, the CARB has set greenhouse gas reduction targets at eight percent below 2005 per capita emissions levels by 2020, and 19 percent below 2005 per capita emissions levels by 2035. The Connect SoCal plan lays out a strategy for the region to meet these targets. The Connect SoCal SCS has been found to meet State targets for reducing GHG emissions from cars and light trucks. Connect SoCal achieves per capita GHG emission reductions by 8 percent in 2020, relative to 2005 levels, and by 19 percent in 2035, thereby meeting the GHG reduction targets established by the ARB for the SCAG region.

SCAQMD

In October 2008, SCAQMD staff proposed the use of a percent emission reduction target to determine significance for commercial/residential projects that emit greater than 3,000 metric tons of CO_2e per year. On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold for stationary source/industrial projects where SCAQMD is lead agency. However, SCAQMD has yet to formally adopt a GHG significance threshold for land use development projects (e.g., residential/commercial projects) and has formed a GHG Significance Threshold Working Group to further evaluate potential GHG significance thresholds. However, this group as not met since 2010.

Existing Statewide GHG Emissions Inventory

The California statewide GHG inventory is a critical piece, in addition to data from various AB 32 programs, in demonstrating the state's progress in achieving the statewide GHG targets established by AB 32 (reduce emissions to the 1990 levels by 2020) and SB 32 (reduce emissions to at least 40 percent below the 1990 levels by 2030). The 2020 edition of the GHG inventory includes the emissions of the seven GHGs identified in AB 32 for the years 2000 to 2018 and uses an inventory scope and framework consistent with international and national GHG inventory practices. CARB compiles GHG inventories for the State of California. Based on the 2018 GHG inventory data (i.e., the latest year for which data are available from CARB) prepared by CARB in 2020, California's annual statewide GHG emission inventory was estimated at 425 $MMTCO_2e$. A table summary of the emissions reported by sector is provided below in Table 4.15.

Table 4.15
Statewide 2018 GHG Emissions by Scoping Plan Sector

Economic Sector	2018 Emissions (MMT CO_2e)	Percentage
Transportation	169.5	39.9%
Industrial	89.2	21.0%
Electric Power	63.1	14.8%
Commercial & Residential	41.4	9.7%
Agriculture	32.6	7.7%
High GWP	20.5	4.8%
Recycling & Waste	9.1	2.1%
Total	425.4	100 %

Source: California Air Resources Board (2020). California Greenhouse Gas Emission Inventory - 2020 Edition. Data available at: https://ww3.arb.ca.gov/cc/inventory/data/data.htm

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

Less Than Significant Impact. Neither the City, SCAQMD, nor the State CEQA Guidelines Amendments provide any adopted thresholds of significance for addressing an office and commercial project's GHG emissions. Nonetheless, Section 15064.4 of the CEQA Guidelines serves to assist lead agencies in determining the significance of the impacts of GHGs. Because the City of Los Angeles does not have an adopted quantitative threshold of significance for an office and commercial project's generation of greenhouse gas emissions, the following analysis is based on a combination of the requirements outlined in the CEQA Guidelines.

CEQA Guidelines Section 15064.4 does not establish a threshold of significance; instead lead agencies are called on to establish significance thresholds for their respective jurisdictions in which a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as the California Air Pollution Control Officer's Association ("CAPCOA"), so long as any threshold chosen is supported by substantial evidence. The CEQA Guidelines Amendments also clarify that the effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analyses.

Lead agencies must either establish significance thresholds for their respective jurisdictions or determine significance on a case-by-case basis. The lead agency should use its "careful judgment" in making a determination of significance and should make a "good-faith" effort to "describe, calculate or estimate" the amount of GHGs that will result from a project. The lead agency is given the discretion to select a reasonable model and methodology to quantify GHGs and to rely on a qualitative analysis or performance-based standards for its determination. A lead agency should also consider the following factors, among others, when assessing the significance of impacts from GHGs: (1) the extent to which the project may increase or reduce GHGs; (2) whether the GHG emissions exceed a threshold of significance that the lead agency determines applies to the project; and (3) the extent to which the project complies with regulations or

requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

The California Supreme Court's decision published on November 30, 2015, in the *Center for Biological Diversity v. California Department of Fish and Wildlife* (62 Cal.4th 204) (also known as the Newhall Ranch Case) reviewed the methodology used to analyze GHG emissions in CEQA. The California Supreme Court suggested regulatory consistency as one pathway to compliance, by stating that a lead agency might assess consistency with AB 32's goal in whole or in part by looking to compliance with regulatory programs designed to reduce GHG emissions from particular activities. The Court stated that a lead agency might assess consistency with AB 32's goal in whole or part by looking to compliance with regulatory programs designed to reduce greenhouse gas emissions from particular activities, including statewide programs and local climate action plans or GHG emissions reduction plans. This approach is consistent with CEQA Guidelines Section 15064.4, which provides that a determination that an impact is not cumulatively considerable may rest on compliance with previously adopted plans or regulations, including plans or regulations for the reduction of GHG emissions. Importantly, the Court also suggested: "A lead agency may rely on existing numerical thresholds of significance for greenhouse gas emissions" (bright line threshold approach) if supported by substantial evidence."

For the Project, no applicable numeric significance threshold for GHG emissions has been adopted by the State, SCAQMD, or the City of Los Angeles. Although state, regional, and local plans and policies have been adopted to help address climate change (see discussions above), no current law or regulation would regulate all aspects of the Project's GHG emissions.

In the absence of any adopted numeric threshold, the significance of the Project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b)(2) by considering whether the Project complies with applicable plans, policies, regulations, and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. For this Project, as an office and ground floor commercial land use development project, the most directly applicable adopted regulatory plan to reduce GHG emissions is Connect SoCal, which is designed to achieve regional GHG reductions from the land use and transportation sectors as required by SB 375 and the State's long-term climate goals. This analysis also considers consistency with regulations or requirements set forth by the 2008 Scoping Plan and subsequent updates, SB 375, the City of Los Angeles Sustainable City pLAn/L.A.'s Green New Deal, and the LA Green Building Code.

However, for informational purposes, the analysis also calculates the amount of GHG emissions that would be attributable to the Project using recommended air quality models, as described below. The primary purpose of quantifying the Project's GHG emissions is to satisfy CEQA Guidelines Section 15064.4(a), which calls for a good-faith effort to describe and quantify emissions. The estimated emissions inventory is also used to quantify and determine the reduction in the Project's incremental contribution of GHG emissions as a result of compliance with regulations and requirements adopted to implement plans for the reduction or mitigation of GHG emissions. The significance of the Project's GHG emissions impacts is not based on the quantification of GHG emissions provided herein.

Existing Project Site GHG Emissions

The Project Site is currently developed with the recently constructed 640 S. Santa Fe Avenue building, a 107,224 square foot, four-story, mixed-use office and ground floor commercial building with two levels of subterranean parking. Construction of the 640 S. Santa Fe Avenue building was completed in April 2021. As shown in Table 4.16, below, the on-site operations of the existing conditions on the Project Site generates approximately 3,009 metric tons of $CO2_e$ emissions per year ($CO2_eMTY$). The Development Site is improved with a surface parking lot serving the 640 S. Santa Fe Avenue building. Thus, there are no GHG emissions directly attributable to the Development Site.

Table 4.16
Project Site Baseline Conditions Operational GHG Emissions

Emissions Source	CO_2e Emissions (Metric Tons per Year)
Area	<0.01
Energy	1,170
Mobile (Motor Vehicles)	1,626
Stationary	5
Waste	26
Water	182
Total	**3,009**

The CalEEMod worksheets are contained in Appendix D to this IS/MND.
Source: Parker Environmental Consultants, 2021.

Project GHG Emissions

Construction GHG Emissions

Construction of the Project would emit GHG emissions through the combustion of fossil fuels by heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the Project Site. These impacts would vary day to day over the approximate 24-month duration of construction activities. Emissions of GHGs were calculated using CalEEMod (*Version 2016.3.2*) for each year of construction of the Project.

The quantification of the Project's construction GHG emissions was estimated based on the demolition of the existing surface parking lot on the eastern portion of the Project Site and the new construction of a 14-story commercial building with 188,954 square feet of floor area and two levels of below grade parking. As shown in Table 4.17, below, the total GHG emissions from construction activities related to the Project would be approximately 1,188 CO_2e MTY, with the greatest annual emissions occurring in 2023.

Table 4.17
Project Construction Greenhouse Gas Emissions

Year	CO_2e Emissions (Metric Tons per Year) [a]
2022	429
2023	584
2024	175
Total Construction GHG Emissions	**1,188**

[a] *Construction CO_2 values were derived using CalEEMod Version 2016.3.2 Calculation data and results are provided in Appendix D, Greenhouse Gas Emissions Calculations Worksheets.*
Source: Parker Environmental Consultants, 2021.

Pursuant to SCAQMD guidance recommended in the SCAQMD GHG Working Group meeting on November 19, 2009, GHG emissions from construction were amortized (i.e., averaged annually) over the lifetime of the Project. As impacts from construction activities occur over a relatively short-term period of time, they contribute a relatively small portion of the overall lifetime project GHG emissions. In addition, GHG emission reduction measures for construction equipment are relatively limited. Therefore, the SCAQMD recommends that construction emissions be amortized over a 30-year project lifetime, so that GHG reduction measures address construction GHG emissions as part of the operational GHG reduction strategies.[80] Therefore, total construction GHG emissions were divided by 30 to determine annual construction emissions comparable to operational emissions in the analysis below.

Operational GHG Emissions

The GHG emissions resulting from operation of the Project, which involves the usage of on-road mobile vehicles, electricity, natural gas, water, landscape equipment and generation of solid waste and wastewater, were calculated under two separate scenarios in order to illustrate the effectiveness of the Project's compliance with the LA Green Building Code and other mitigating features that would be effective in reducing GHG emissions, such as the Project Site being an infill lot, within a Transit Priority Area, and its proximity to transit. The Project's operational GHG emissions were calculated using CalEEMod (*Version 2016.3.2*). The Project's GHG emissions were quantified based on the operation of a 188,954 square foot commercial building comprised of 184,629 square feet of office uses and approximately 4,325 square feet of ground floor commercial uses and two levels of subterranean parking. As shown in Table 4.18, below, the net increase in GHG emissions generated by the Project would result in a net increase of 4,503 CO_2e MTY. The total GHG emissions from the entire Project Site are estimated to be 7,512 CO_2e MTY.

[80] *SCAQMD Governing Board Agenda Item 31, December 5, 2008.*

Table 4.18
Project Operational Greenhouse Gas Emissions

Emissions Source	Estimated Project Generated CO_2e Emissions (Metric Tons per Year)
Area	0.02
Energy	1,886
Mobile	2,202
Stationary	5
Waste	34
Water	336
Construction Emissions [a]	40
Total Project GHG Emissions:	**4,503**
Plus Existing Project Site Emissions:	*3,009*
Total Project Site Emissions:	**7,512**

Notes:
[a] *The total construction GHG emissions were amortized over 30 years and added to the operation of the Project.*
Calculation data and results provided in Appendix D, Greenhouse Gas Emissions Calculations Worksheets.
Source: Parker Environmental Consultants, 2021.

The Project is an infill development and is repurposing previously developed land, which is encouraged through the State, regional, and local plans and policies (i.e., AB32, SB375, and SCAG's Connect SoCal growth strategy). As stated above, the GHG analysis presented herein is not based on a quantitative threshold of significance, rather, is based on the Project's compliance with the various regulations, plans, and policies that have been adopted with the intent of reducing GHG emissions in furtherance of the State's GHG reduction targets under SB 32.

Through required implementation of the Green Building Code, the Project Site's location on an infill site within a Transit Priority Area, the Project would be consistent with local and statewide goals and policies aimed at reducing the generation of GHGs, including CARB's SB 32 Scoping Plan aimed at achieving a 40 percent reduction of 1990 GHG emission levels by 2030. The following describes the benefits and applicability of the Project's compliance measures and design features that serve to reduce the carbon footprint of the development:

Infill Development. The Project is located on an infill site, half of which is developed with the 640 S. Santa Fe Avenue building, and the other half as the proposed Development Site of the Project, which is currently developed as a surface parking lot for the 640 S. Santa Fe Avenue building. The Project would include the redevelopment of the surface parking lot into a 14-story office and ground floor commercial building with two levels of subterranean parking and five levels of parking above grade. The Project Site is also located in an area that is adequately served by existing infrastructure and would not require the extension of utilities or roads to accommodate the proposed development.

Energy Conservation. The Project would include the development of a new non-residential building or structure of 50,000 gross square feet or more of floor area. As

mandated by the LA Green Building Code, the Project must meet Title 24 2019 standards and include ENERGY-STAR appliances, were applicable. Additionally, the LA Green Building Code mandates additional energy conservation features such as on-site solar generation, which is not quantified in the GHG emissions inventory above, but would serve to further reduce the Project's GHG emissions.

Solid Waste Reduction Efforts. LA Green Building Code Section 5.408.1 and LAMC Section 66.32 require the construction contractor to obtain an AB 939 Compliance Permit certifying the delivery of the construction and demolition waste to a certified construction and demolition waste processing facility. Diversion efforts would be accomplished through source reduction, recycling, and composting. Finally, the Project is required by the California Solid Waste Reuse and Recycling Access Act of 1991 to provide adequate storage areas for collection and storage of recyclable waste materials. As such, a 50 percent reduction of a Project's waste stream to the local landfill would reduce methane emissions and thus lower the Project's contribution to global GHG emissions.

Water Conservation. As mandated by the L.A. Green Building Code, the Project would be required to provide separate submeters for individual leased, rented or other tenant spaces projected to consume more than 100 gallons per day and any building or addition that is projected to consume more than 1,000 gallons per day. Plumbing fixtures would need to comply with one of the following: (1) a 20% reduction in the building's "water use baseline" as demonstrated in Table 5.303.2.2 of the Los Angeles Plumbing Code; or (2) comply with the maximum flow rates shown in Table 5.303.2.3 of the Plumbing Code. The Project would also be required to develop a water budget for landscape irrigation use and install automatic irrigation systems with weather or soil moisture-based controllers.

In addition to the GHG emission reductions described above, it is important to note that the CO_2e estimates from mobile sources (particularly CO_2, CH_4, and N_2O emissions) are conservative and likely much greater than the emissions that would actually occur. The methodology used assumes that all emissions sources are new sources and that emissions from these sources are 100 percent additive to existing environment. This is a standard approach taken for air quality and greenhouse gas emissions analyses. In many cases, such an assumption is appropriate because it is impossible to determine whether emissions sources associated with a project move from outside the South Coast Air Basin and are new emissions sources, or whether they are sources that were already occurring within the Basin and merely shifted to a new location. Because the effects of GHGs are global in nature, a project that shifts the location of a GHG-emitting activity (e.g., where people live, where vehicles drive, or where companies conduct business) would result in no net change in global GHG emissions levels.

Plan Consistency

Consistency with SB 32 Scoping Plan

While the Scoping Plan provided several board goals and policies aimed at reducing greenhouse gasses on a statewide level, some of the policies are applicable or interrelated to the development of specific land use projects at the local level. Provided below in Table 4.19, is a consistency analysis of the Scoping Plan's policies that are applicable or indirectly applicable to the Project. As shown in Table 4.19, the Project would be consistent with the applicable GHG reduction plans and policies of the Scoping Plan.

Table 4.19
Consistency with Applicable 2017 Scoping Plan Measures

Measures	Consistency Analysis
Implement SB 350 by 2030: • Increase the Renewables Portfolio Standard to 50 percent of retail sales by 2030 and ensure grid reliability.	**No Conflict**. The Project complies with this measure inasmuch as the Project would derive its electricity from the Los Angeles Department of Water and Power (LADWP), which has committed to diversify its portfolio of energy sources to achieve 50 percent renewables by 2030.
• Establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030.	**No Conflict**. The Project complies with this measure inasmuch as the Project would be designed and constructed to meet the L.A. Green Building Code for new construction and will include several measures designed to reduce energy consumption.
• Reduce GHG emissions in the electricity sector through the implementation of the above measures and other actions as modeled in Integrated Resource Plans (IRP) to meet GHG emissions reductions planning targets in the IRP process. Load-serving entities and publicly- owned utilities meet GHG emissions reductions planning targets through a combination of measures as described in IRPs.	**No Conflict.** The Project would be designed and constructed to meet LA Green Building Code standards, where applicable by including several measures designed to reduce energy consumption. The Project would be designed with energy efficient boilers, heaters and air conditioning systems.
Implement Mobile Source Strategy (Cleaner Technology and Fuels): • Further reduce VMT through continued implementation of SB 375 and regional Sustainable Communities Strategies; forthcoming statewide implementation of SB 743; and potential additional VMT reduction strategies not specified in the Mobile Source Strategy but included in the document "Potential VMT Reduction Strategies for Discussion."	**No Conflict**. SB 375 requires SCAG to prepare the SCS for the region, which is discussed further below. The Project represents an infill development within an existing urbanized area that would concentrate commercial office and retail uses within an HQTA. The Project would include a mix of land uses including commercial office and retail/restaurant uses that would provide new opportunities to live and work within an HQTA, resulting in decreased vehicle miles traveled within the City. Therefore, the Project would be consistent with SCAG's Connect SoCal Plan, which specifically encourages this type of

	development. The Project would also provide direct bicycle and pedestrian access to Jesse Street and Mesquit Street which would be improved with widened sidewalks to activate the street frontage. Thus, this would serve to improve walkability, reduce vehicles-per-miles traveled, promote alternatives to driving, and to reduce GHG emissions. The mix of office, restaurant, and retail uses would provide synergy between the land uses in terms of trip making. The Project Site is also served by a number of transit lines which would all serve to reduce vehicle trips.
By 2019, adjust performance measures used to select and design transportation facilities. • Harmonize project performance with emissions reductions, and increase competitiveness of transit and active transportation modes (e.g. via guideline documents, funding programs, project selection, etc.).	**No Conflict**. The Project complies with this measure inasmuch as the Project would be designed to promote and support pedestrian activity on-site and in the Project Site area. The Project would provide pedestrian connectivity to Jesse Street, S. Santa Fe Avenue, and Mesquit Street. Additionally, the Project Site is within proximity to many services, job opportunities, and transit opportunities within the Arts District. Additionally, a total of five Metro bus lines serve the nearby Project Site area, including Metro Local lines 18, 60, 62; and Metro Rapid Lines 720 and 760. The DASH Downtown A bus also serves the nearby Project Site area. These bus lines have stops located within convenient walking distance of the Project Site along 6th Street, 7th Street, S. Santa Fe Avenue, and other nearby streets with some lines with headways of 15 minutes or less (see Figure 3.1, Project Location Map, above).
By 2019, develop regulations and programs to support organic waste landfill reduction goals in the SLCP and SB 1383.	**No Conflict**. The Project complies with this measure inasmuch as the Project would comply with AB 341, which sets a statewide policy goal that not less than 75 percent of solid waste generated be source reduced, recycled, or composted by the year 2020. LAMC Section 66.32.1 requires all persons who collect, remove or transport solid waste, including C&D waste generated within the City, to obtain an AB 939 Compliance Permit from the Bureau of Sanitation. Compliance with this measure would ensure all C&D waste is transported to a Certified C&D waste processing facility for the purpose of recovering reusable and recyclable materials and disposing of non-recyclable residual materials.
Measures not applicable to this Project are not listed. *Source: California's 2017 Climate Change Scoping Plan, November 2017, pg. 103; Parker Environmental Consultants, 2021.*	

Consistency with SB 375

California SB 375 requires integration of planning processes for transportation, land-use and housing. Under the bill, each Metropolitan Planning Organization would be required to adopt a Sustainable Community Strategy ("SCS") to encourage compact development that reduces passenger vehicle miles traveled and trips so that the region will meet the target provided in the Scoping Plan, created by CARB, for reducing GHG emissions. SB 375 requires SCAG to direct the development of the SCS for the region. A discussion of the Project's consistency with the SCS is provided further below.

Consistency with Connect SoCal

The Project would be consistent with the following key GHG reduction strategies in SCAG's Connect SoCal, which are based on changing the region's land use and travel patterns:

- Focus growth near destinations and mobility options;
- Promote diverse housing choices;
- Leverage technology innovations;
- Support implementation of sustainable policies; and
- Promote a green region

The Project represents an infill development within an existing urbanized area that would concentrate new office and commercial uses within a High Quality Transit Area ("HQTA"). This is consistent with the smart growth policies of Connect SoCal, which encourage the increase of commercial uses in areas accessible to transit (i.e. Priority Growth Areas (PGAs) such as Job Centers, TPAs, HQTAs, Neighborhood Mobility Areas (NMAs), Livable Corridors, and Spheres of Influence (SOIs). The Project is considered within a High Quality Transit Area, which is defined as a generally walkable transit village or corridor within one half-mile of a well-serviced transit stop, or a transit corridor with 15-minute or less service frequency during peak commute hours. The Project would concentrate new development within a half of a mile (walking distance) of several Metro lines (local lines 18, 60, 62; and rapid lines 720 and 760), the LADOT DASH Downtown A bus line, and a regional Greyhound Lines, Inc. station, all of which connect to regions of the Los Angeles area and beyond. Some of these stops have peak commute service intervals of 15 minutes or less (see Figure 3.1, Project Location Map, above).

The Project would also provide 51 short-term bicycle parking spaces and 95 long-term bicycle parking spaces on-site, the use of which would further facilitate a reduction in vehicle miles traveled and related vehicular GHG emissions. Additionally, in order to accommodate increased service levels on the B Line (Red Line)/D Line (Purple Line), Metro is moving forward with two facility improvements: a new turnback facility in the Division 20 railyard just north of 4th Street and a widening of the heavy rail tunnel south of the US-101 Freeway. The Project is located within one-half mile of the approved Division 20 railyard extension to the B Line/D Line.[81] Thus, the

[81] *Los Angeles County Metro Project Tracker website, https://www.metro.net/interactives/datatables/project/, accessed August 2021.*

Project Site's location and bicycle parking provides opportunities for employees and patrons to use alternative modes of transportation to reduce vehicle trips. These and other measures such as the Project's TDM Program would further promote a reduction in vehicle miles traveled and subsequent reduction in GHG emissions, which would be consistent with the goals of Connect SoCal.

Consistency with L.A. Green Building Code

The LA Green Building Code contains both mandatory and voluntary green building measures for the reduction of GHG emissions through energy conservation. Among many requirements, the LA Green Building Code requires projects to achieve a 20 percent reduction in potable water use and wastewater generation, meet and exceed Title 24 Standards adopted by the California Energy Commission, meet 50 percent construction waste recycling levels, and provide Energy-Star rated appliances where applicable. The Project would comply with these mandatory measures. Therefore, the Project is consistent with the LA Green Building Code.

As demonstrated above, the Project's design features and compliance with regulatory measures would be consistent with local and statewide goals and policies aimed at reducing the generation of GHGs, including SB 32, SB 375, the LA Green Building Code, and CARB's 2017 Scoping Plan aimed at achieving 40 percent below 1990 GHG emission levels by 2030. Therefore, the Project's generation of GHG emissions would not make a project-specific or cumulatively considerable contribution to conflicting with an applicable plan, policy, or regulation for the purposes of reducing the emissions of greenhouse gases, and the Project's impact would be less than significant.

Therefore, the Project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. Project impacts related to GHG emissions would be less than significant.

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

Less Than Significant Impact. As described above and in response to Checklist Question VIII(a) above in this section, the Project would be consistent with local and Statewide goals and policies aimed at reducing the generation of GHGs, including AB 32, SB 375, the LA Green Building Code, and CARB's 2017 Scoping Plan aimed at achieving 40 percent below 1990 GHG emission levels by 2030 and 80% below 1990 levels by 2050. Therefore, the Project's generation of GHG emissions would not make a project-specific or cumulatively considerable contribution conflicting with an applicable plan, policy or regulation for the purposes of reducing the emissions of greenhouse gases, and the Project's impact would be less than significant.

Mitigation Measures

Project impacts with regard to greenhouse gas emissions would be less than significant. Therefore, no mitigation measures are required.

Cumulative Impacts

Less Than Significant Impact. Pursuant to the Office of Planning and Research's recently published Discussion Draft on CEQA and Climate Change (December 2018), in determining the significance of a project's greenhouse gas emissions, the lead agency should focus its analysis on the reasonably foreseeable incremental contribution of a project's emissions to the effects of climate change. It is the increased accumulation of GHG emissions from more than one project and many sources in the atmosphere that may result in global climate change, which can cause the adverse environmental effects previously discussed. Accordingly, the threshold of significance for GHG emissions determines whether a project's contribution to global climate change is "cumulatively considerable."

Many regulatory agencies, including the SCAQMD, concur that GHG and climate change should be evaluated as a potentially significant cumulative impact, rather than a project direct impact. Accordingly, the GHG analysis presented above analyzes whether the Project's impact would be cumulatively considerable using a plan-based approach (and quantitative and qualitative analysis) to determine the Project's contributing effect on climate change. As concluded above, the Project would be consistent with all applicable local ordinances, regulations and policies that have been adopted in furtherance of the state and City's goals of reducing GHG emissions. Thus, the Project would not make a cumulatively considerable contribution to GHG emissions and impacts would be less than significant.

Mitigation Measures

Cumulative impacts with regard to greenhouse gas emissions would be less than significant. Therefore, no mitigation measures are required.

IX. Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?	☐	☐	☒	☐
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 or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

In 2015, the California Supreme Court in CBIA v BAAQMD, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of the project. The revised thresholds are intended to comply with this decision. Specifically, the decision held that an impact from the existing environment to a project, including future users and/or residents, is not an impact for the purposes of CEQA. However, if the project, including future users and residents, exacerbates existing conditions that already exist, that impact must be assessed, including how it might affect future users and/or residents of the project. For example, if construction of a project on a hazardous waste site will cause the potential dispersion of hazardous waste in the environment, the EIR should assess the impacts of that dispersion to the environment, including to the project's residents.

The following section summarizes and incorporates the referenced information from the following: Phase I Environmental Site Assessment, 640 South Santa Fe Avenue, Los Angeles, California 90021 ("Phase I ESA"), prepared by Ninyo & Moore Geotechnical and Environmental Sciences Consultants ("Ninyo & Moore"), dated March 18, 2016; and Phase II Environmental Site Assessment, 640 South Santa Fe Avenue, Los Angeles, California 90021, prepared by EFI Global, dated June 30, 2016. Both ESAs are included as Appendix E to this IS/MND. It is important to note that while the Phase I ESA and Phase II ESA were analyzed and completed for the 640 S. Santa Fe Avenue Project, both ESAs address the historical environmental conditions of the

entire Project Site, half of which includes the Development Site of the Project and is therefore applicable to the Project.

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

Less Than Significant Impact. A significant impact may occur if a project would involve the use or disposal of hazardous materials as part of its routine operations or would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors. The Project includes the construction of a 14-story office and ground floor commercial development with a gross floor area of 188,954 square feet. During the operation of the Project, no hazardous materials other than modest amounts of typical cleaning supplies and solvents used for janitorial purposes would routinely be transported to the Project Site. The acquisition, use, handling, storage, and disposal of these substances would comply with all applicable federal, State, and local requirements.

Construction could involve the use of potentially hazardous materials, including vehicle fuels, oils, and transmission fluids that are common in during construction. However, all potentially hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations, which include requirements for disposal of hazardous materials at a facility licensed to accept such waste based on its waste classification and the waste acceptance criteria of the permitted disposal facilities. Therefore, the Project would not create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials, and the impacts will be less than significant.

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?

Less Than Significant Impact. A project would normally have a significant impact to hazards and hazardous materials if: (a) the project involved a risk of accidental explosion or release of hazardous substances (including, but not limited to oil, pesticides, chemicals or radiation); or (b) the project involved the creation of any health hazard or potential health hazard.

Based on the Department of Toxic Substances Control EnviroStor Database, the Project Site is not listed for cleanup, permitting, or investigation of any hazardous waste contamination.[82] Therefore, the Project would not handle, dispose, or store any known hazardous materials during the Project's construction activities. Additionally, the Project, once operational, would not use hazardous materials other than modest amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes that are typically associated with the operation of the Project, and the use of these substances would comply with State Health Codes and Regulations.

[82] *California, Department of Toxic Substances Search EnviroStor, website: http://www.envirostor.dtsc.ca.gov/public/, accessed August 2020.*

Historical Analysis

Currently, the Development Site for the Project is improved with a surface parking lot for the 640 S. Santa Fe Avenue building. As such, the Project would redevelop this surface parking lot into a 14-story office and ground floor commercial building with two levels of subterranean parking and five levels of parking above grade. The Phase I ESA completed by Ninyo & Moore included historical aerial photographs provided by Environmental Data Resource "(EDR") which showed that the Project Site was developed with commercial-appearing structures from at least 1923 through 1989. The southeast corner of the Project Site was the location of a railroad from at least 1923 through 1994. By at least 1994, the Project Site appeared as vacant land, and by at least 2002 the previous cold storage warehouse and adjacent surface parking lot had been built. The cold storage warehouse and adjacent surface parking lot stood from 2002 until 2019, when they were demolished to construct the 640 S. Santa Fe Avenue building and its adjacent surface parking lot.

Historical Sanborn Fire Insurance Maps analyzed by the Phase I ESA show that the Project Site was developed with residential properties from at least 1890 through 1906 and was then developed with industrial properties from at least 1950 through 1970. The Phase I ESA concluded that the former presence of a machine and metal stamping shop with paint booths and the railroad line represent a recognized environmental condition ("REC"), which are defined by ASTM International as "the presence of likely presence of any hazardous substance or petroleum products in, on, or at a property: (1) due to a release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of future release to the environment."

The presence of a railroad right-of-way on the southeast portion of the Project Site, which includes a section of the Development Site for the Project, presents a potential for contamination resulting from leaks or spills from the railcars, or historic application of surface chemicals during railroad operations. According to the Phase I ESA, no accidents or spills along the railroad tracks were reported in the Emergency Response Notification System ("ERNS"), and evidence of spills on the former railroad right-of-way was not observed during the site visit in 2016. However, the Phase I ESA concluded that the suspected presence of railroad related chemicals in shallow soils on the Project Site due to operation of the railroad tracks would be considered a REC.

Based on the findings of the Phase I ESA, which reported that the Project Site was historically used as a machine and metal stamping shop with paint booths from at least 1950 through at least 1960 and the southeastern portion of the Project Site containing railroad tracks from at least 1923 through 1989, a Phase II ESA was conducted by EFI Global and completed on June 30, 2016. EGI Global conducted the Phase II ESA to evaluate whether the former Project Site operations and features had significantly impacted the subsurface of the Project Site. A total of 17 borings were advanced to a maximum depth of 15 feet bgs throughout the Project Site, and select soils samples were collected and analyzed. Four additional borings were advanced to depths of 40 feet bgs and soil vapor probes were installed as part of Andersen Environmental's methane testing investigation (discussed further below). From the soil vapor extraction results, which can be found in Appendix E, EFI Global concluded that a threat to human health or groundwater beneath the Project Site was not identified as a result of former Project Site operations. As such,

EGI Global states that further investigation in the areas of the former machine shop and railroads is not warranted at this time, assuming continued commercial use of this site. The Project would redevelop the eastern half of the Project Site currently improved with a surface parking lot for the 640 S. Santa Fe Avenue building into a 14-story office and ground floor commercial building with two levels of subterranean parking. Therefore, the Project would continue to utilize the Project Site as a commercial use.

Oil and Gas Maps

The Phase I ESA also analyzed the California Department of Conservation, Division of Oil, Gas, and Geothermal Resources ("DOGGR") Well Finder website to determine the presence of oil wells on the Project Site and in the vicinity. Several active oil wells are located within a one-mile radius of the Project Site, which is located approximately 0.16 mile south-southeast from the boundaries of the Union station oil field. There are several active oil wells within one mile of the Project Site. The nearest oil well, located approximately 0.13 mile west of the Project Site, has been plugged.

Methane Assessment

The Project Site is located within a designated Methane Buffer Zone of the City. These Zones are subject to testing and mitigation required by the Los Angeles Department of Building and Safety ("LADBS"), Division 71 Methane Seepage Regulations of the LABC, Section 91.71. Pursuant to LABC Division 71, Section 91.7104.2, all buildings located in the Methane Zone and Methane Buffer Zone shall provide a methane mitigation system as required by LAMC Table 71 based on the appropriate Site Design Level. As such, a Methane Assessment was conducted by Andersen Environmental and completed on May 17, 2016, which is included in Appendix E. Field activities included shallow gas probe installations, shallow gas probe testing, deep methane probe set installations, and pressure monitoring and methane testing (see Appendix E for further details). As indicated in Tables 1, 2, and 3 of the Methane Assessment, a maximum methane detection of 100 ppmv and a maximum pressure of 0.11 inches of water were recorded during the three sampling events. Therefore, a Design Methane Concentration of 110 ppmv and a Design Methane Pressure of <2" should be used to determine the Site Design Level.

Based on the results of the Methane Assessment, the Project Site qualifies as Site Design Level II, as defined in the Minimum Methane Mitigation Requirements set forth in Table 1B of the LADBS "Standard Plan: Methane Hazard Mitigation". As such, a Site Design Level II with Design Methane Pressure of $\leq$2" in a Methane Buffer Zone requires no methane mitigation. Accordingly, no methane mitigation design would be required.

Asbestos-Containing Materials (ACMs) and Lead Based Paint

ACMs and lead based paints are associated with older building stock, particularly those built before and right around 1978 and 1989, when the United States Environmental Protection Agency ("EPA") banned lead based paint and ACMs, respectively. The Development Site of the Project is currently improved with a surface parking lot for the 640 S. Santa Fe Avenue Project. As such, there is no presence of ACMs or lead based paints. Therefore, no impacts would occur relating to ACMs and lead based paints.

Environmental Database Search

As part of the Phase I ESA, Ninyo & Moore performed an environmental information database search that included numerous federal, State, and local databases regarding properties of environmental concern or contamination. The Project Site as of March 2016, when the Phase I ESA was completed, was not listed on any of these federal, State, or local databases. This is further supported by the Department of Toxic Substances Control EnviroStor Database, which shows that the Project Site is not listed for cleanup, permitting, or investigation of any hazardous waste contamination.[83]

Vapor Migration

After conducting a preliminary vapor encroachment screen for potential chemicals of concern that might migrate as vapors onto the Project Site as a result of contaminated soil and/or groundwater near the Project Site, the Phase I ESA concluded that it is unlikely that a vapor encroachment condition currently exists beneath the Project Site.

In conclusion, the Phase I ESA completed for the 640 S. Santa Fe Avenue Project determined that there was no evidence of RECs in connection with the Project Site, except for the former use of the Project Site as a machine and metal stamping shop with paint booths from at least 1950 through 1960 and the former presence of railroad tracks on the southeast corner of the Project Site from at least 1923 through 1989. A Phase II ESA was then completed by EFI Global to evaluate whether the identified RECs in the Phase I ESA had significantly impacted the subsurface of the Project Site. The Phase II ESA concluded that a threat to human health or groundwater beneath the Project Site was not identified as a result of former Project Site operations, and that no further investigation is warranted, assuming continued commercial use of the Project Site. Per LADBS requirements, a Methane Assessment was conducted at the Project Site as well, which concluded that the Project Site required no methane mitigation. Therefore, the Project would not 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, and the impacts will be less than significant.

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

Less Than Significant Impact. A project would normally have a significant impact to hazards and hazardous materials if: (a) the project involved a risk of accidental explosion or release of hazardous substances (including, but not limited to oil, pesticides, chemicals or radiation); or (b) the project involved the creation of any health hazard or potential health hazard (i.e., such as exposure to lead based paint, polychlorinated biphenyls, or asbestos). There are no Los Angeles Unified School District schools within one-quarter mile (approx. 1,320 feet) of the Project Site, nor any private or charter schools. The nearest LAUSD school is the Metropolitan High School for continuing education for grades 9 through 12, which is located approximately 1,350 feet southwest of the Project Site and 1,470 feet from the Development Site of the Project.

[83] *Ibid.*

Localized construction impacts associated with noise, dust and localized air quality emissions, and construction traffic/hauling activities generally occur within an area of 500 feet or less of the Project Site. Since no schools are located within 500 feet from the Project Site, the construction activities from the Development Site of the Project would not create a hazard to any nearby schools. Further, the proposed haul route departing from the Project Site to Sunshine Canyon Landfill and the Azusa Land Reclamation landfill would travel south on S. Santa Fe Avenue and west on Porter Street to the I-10 onramp. The haul route departing from Sunshine Canyon Landfill and Azusa Land Reclamation landfill to the Project Site would utilize the I-10 8th Street offramp, travel east on 8th Street, and travel north on S. Santa Fe Avenue. As such, the local haul routes would not pass by any nearby schools. Therefore, construction impacts to nearby schools would be less than significant.

Further, no hazardous materials other than the modest amounts of typical cleaning supplies and solvents used for maintenance and janitorial purposes would be present at the Project Site, and the acquisition, use, handling, storage, and disposal of these substances would comply with all applicable federal, State, and local requirements. The operational activities of the Project would not create a significant hazard through hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Operational impacts on nearby schools would be less than significant.

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?

Less Than Significant Impact. 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. A significant impact may occur if the Project Site is included on any of the above lists and poses an environmental hazard to surrounding sensitive uses. The Project Site is not listed in any government database for having hazardous wastes or released hazardous materials,[84] and development of the Project would not create a significant hazard to the public or the environment.

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

No Impact. A significant project-related impact may occur if the Project were placed within a public airport land use plan area, or within two miles of a public airport, and subject to a safety hazard. The closest public airport to the Project Site is the Bob Hope Airport. However, the airport is not located within two miles of the Project Site. Furthermore, the Project Site is not in an airport

[84] *Ibid.*

influence area.[85] Therefore, no impacts related to safety hazards in an airport land use plan or within two miles of a public airport will occur.

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

Less Than Significant Impact. A project would normally have a significant impact to hazards and hazardous materials if: (a) the project involved possible interference with an emergency response plan or emergency evacuation plan. The determination of significance shall be made on a case-by-case basis considering the degree to which the project may require a new or interfere with an existing emergency response or evacuation plan, and the severity of the consequences. The Project Site is not located in a disaster route according to the Los Angeles Central Area Disaster Route Map of Los Angeles County.[86] Additionally, based on the City of Los Angeles Safety Element, the Project Site is not located on an identified disaster route or an adopted emergency response or evacuation plan.[87] Development of the Project may require temporary and intermittent partial street closures due to construction activities. Nonetheless, while such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans. The Project would not cause permanent alterations to vehicular circulation routes and patterns, impede public access, or travel upon public rights-of-way. Further, emergency vehicle drivers have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, the Project would not be expected to interfere with any adopted emergency response plan or emergency evacuation plan, and a less than significant impact would occur.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. The Project Site is located in a highly urbanized area of Los Angeles and does not include wildlands or high fire hazard terrain or vegetation. The Project Site is not located in a Very High Fire Hazard Severity Zone (VHFHSZ).[88] Therefore, no impacts from wildland fires are expected to occur.

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[85] *Los Angeles County, Department of Regional Planning, Los Angeles County Airport Land Use Commission, Burbank/Glendale/Pasadena Airport Influence Area Map, May 15, 2003, website: http://planning.lacounty.gov/assets/upl/project/aluc_airport-burbank.pdf, accessed September 2020.*

[86] *Los Angeles County Department of Public Works, City of Los Angeles Central Area Disaster Route Map, August 13, 2008, website: http://dpw.lacounty.gov/dsg/DisasterRoutes/map/Los%20Angeles%20Central%20Area.pdf, accessed August 2020.*

[87] *City of Los Angeles, Safety Element Exhibit H, Critical Facilities and Lifeline Systems in the City of Los Angeles, November, 2996, website: https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf, accessed August 2020.*

[88] *City of Los Angeles, Department of City Planning, City of Los Angeles Zoning Information and Map Access System (ZIMAS), website: http://zimas.lacity.org, accessed October 2020.*

Mitigation Measures

Project impacts with regard to hazards and hazardous materials would be less than significant. Therefore, no mitigation measures are required.

Cumulative Impacts

Development of the Project in combination with the related projects identified in Section 3, Project Description, have the potential to increase to some degree the risks associated with the use and potential accidental release of hazardous materials in the City of Los Angeles. However, the potential impacts associated with the Project would be less than significant with adherence to all applicable regulations and, therefore, would not be cumulatively considerable. With respect to the related projects, the potential presence of hazardous substances would require evaluation on a case-by-case basis, in conjunction with the development proposals for each of those properties. Further, local municipalities are required to follow local, State, and federal laws regarding hazardous materials, which would further reduce impacts associated with the related projects. Therefore, with compliance with local, State, and federal laws pertaining to hazardous materials, the Project in conjunction with related projects would be expected to result in less-than-significant cumulative impacts with respect to hazardous materials.

Mitigation Measures

Cumulative impacts with regard to hazards and hazardous materials would be less than significant. Therefore, no mitigation measures are required.

X. Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
iii. 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; or	☐	☐	☒	☐
iv. Impede or redirect flood flows?	☐	☐	☐	☒
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Regulatory Setting

Clean Water Act of 1972

The federal Clean Water Act (CWA) was first enacted in 1948 to (1) restore and maintain the chemical, physical, and biological integrity of the Nation's waters by preventing point and nonpoint pollution sources, (2) provide assistance to publicly owned treatment works for the improvement of wastewater treatment, and (3) maintain the integrity of wetlands. With subsequent amendments, current regulations provide that discharges of stormwater to waters of the United States from industrial activities and from construction activities that encompass one acre or more of soil disturbance are effectively prohibited unless the discharge is in compliance with a National Pollutant Discharge Elimination System (NPDES) permit.

The CWA directs states to establish water quality standards for all “waters of the United States” and to review and update such standards on a triennial basis. The U.S. EPA has delegated responsibility for implementation of portions of the CWA, including water quality control planning and control programs in California to the State Water Resources Control Board (SWRCB), and nine Regional Water Quality Control Boards (RWQCB). CWA Section 303(c)(2)(b) requires states to adopt water quality standards for all surface waters of the United States based on the water

body's designated beneficial use. Water quality standards for the Los Angeles region are set forth in The Water Quality Control Plan Los Angeles Region Basin Plan (1995, and as amended in 2010), which is administered by the LARWQCB.

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act (Porter- Cologne Act) establishes the SWRCB and each RWQCB as the principal state agencies for coordinating and controlling water quality in California. Specifically, the Porter-Cologne Act authorizes the SWRCB to adopt, review, and revise policies for all waters of the State (including both surface and groundwater) and directs the RWQCBs to develop regional Basin Plans. California Water Code Section 13170 also authorizes the SWRCB to adopt water quality control plans on its own initiative. The Porter-Cologne Act is administered in the CPAs by the LARWQCB and is implemented at the city level through various programs.

Statewide NPDES General Construction Activity Stormwater Permit

Pursuant to the CWA Section 402(p) and the Porter-Cologne Act, the SWRCB has issued a statewide NPDES General Permit under Order No. 2009-0009-DWQ, NPDES No. CAR000002, which was adopted on September 2, 2009.14 The Order requires that construction activities obtain a permit and submit a Notice of Intent (NOI) along with the appropriate fee to the SWRCB. Construction activities subject to the NPDES General Permit include clearing, grading, and disturbances to the ground, such as stockpiling or excavation, that result in soil disturbances of one acre of total land area or more.

Prior to obtaining the Stormwater Permit, an adequate Stormwater Pollution Prevention Plan (SWPPP) has to be prepared. The SWPPP specifies BMPs that will prevent construction pollutants from contacting stormwater with the intent of keeping all products of erosion from moving offsite into receiving waters. BMPs are intended to diminish impacts to the Maximum Extent Practicable (MEP), which is a standard developed by Congress to allow regulators the flexibility needed to shape programs to the site-specific nature of municipal stormwater discharges. The SWPPP includes a description of: (1) the site, (2) erosion and sediment controls, (3) means of waste disposal, (4) implementation of approved local plans, (5) control of post-construction sediment and erosion control measures and maintenance responsibilities, and (6) non-stormwater management controls. Dischargers are also required to inspect their construction sites before and after storms to identify stormwater discharge associated with construction activity and to identify and implement controls where necessary.

Municipal Separate Storm Sewer Permit (MS4 Permit).

Discharges of urban runoff into municipally-owned separate storm sewer systems (MS4s) are regulated under the general NPDES stormwater permit that has been issued by the RWQCB for Los Angeles County ("MS4 Permit"). Development that could occur under the Proposed Plans would be subject, as applicable, to the waste discharge requirements issued by the RWQCB for the MS4 Permit.

The City of Los Angeles is a co-permittee under the MS4 Permit, and therefore has joint/concurrent legal authority to enforce the terms of the permit within its jurisdiction, including the CPAs. The MS4 Permit is intended to ensure that combinations of site planning, source control and treatment control practices are implemented to protect the quality of receiving waters. The permit requires that new development employ best management practices (BMPs) designed to control pollutants in stormwater runoff to the maximum extent practicable (MEP), details specific sizing criteria for BMPs, and specifies flow control requirements. Site design or planning management BMPs are used to minimize runoff from new development and to discourage development in environmentally sensitive areas that are critical to maintaining water quality. These BMPs include structural practices, source control and treatment techniques and systems, and site design planning principles addressing water quality.

Among other things, the MS4 Permit requires the co-permittees to prepare a Stormwater Quality Management Plan (SQMP) specifying the BMPs that will be implemented to reduce the discharge of pollutants in stormwater to the MEP. For development within the City of Los Angeles (which would include the CPAs), the SQMP is implemented through the City's Standard Urban Stormwater Mitigation Plan (SUSMP).

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. A project would normally have a significant impact on surface water quality if discharges associated with the project would 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 body of water. A significant impact may occur if a project would discharge water which does not meet the quality standards of agencies which regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts would also occur if a project does not comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board ("SWRCB") through its nine Regional Boards. The Project Site lies within the jurisdiction of the Los Angeles Regional Water Quality Control Board ("RWQCB"). Applicable regulations include the NPDES permitting system; LAMC Article 4.4; the low impact development ("LID") requirements, which reduce potential water quality impacts during the construction and operation of a project; and the Urban Runoff Pollution Control Ordinance (Ordinance No. 172,176), which established LAMC Sections 64.70 through 64.70.13 and set the foundation for stormwater management in the City of Los Angeles and Ordinance 173,494.

Construction

Three general sources of potential short-term, construction-related stormwater pollution associated with the Project include: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth moving activities which, when not controlled, may generate soil erosion via storm runoff or mechanical equipment.

The Applicant would not be required to obtain coverage under the SWRCB's NPDES Construction General Permit. Under the Construction General Permit Order 2009-0009-DWQ, dischargers whose projects disturb one (1) or more acres of soil or whose projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity Construction General Permit Order 2009-0009-DWQ. Construction activities subject to this permit includes clearing, grading and disturbances to the ground such as stockpiling, or excavation.

However, as construction activities on the Project Site would be limited to the Development Site on the eastern half of the Project Site, the lot area would be approximately 34,447 square feet (0.79 acres). Therefore, the Project would not disturb one or more acres of soil or disturb less than one or more acres but is part of a larger common plan of development that in total disturbs one or more acres. As such, the Project would not be required to obtain a Construction General Permit and is, therefore, also not required to develop a SWPPP. However, during construction, the Project would still be required to implement BMPs to prevent the transport of sediments from stormwater runoff from the Development Site, per CALGreen Section 5.106.1.2. As such, the implementation of BMPs required by CALGreen Section 5.106.1.2, would ensure that the Project's construction-related soil erosion impacts would be less than significant.

Further, the Geotechnical Report provided recommendations regarding drainage during construction of the 640 S. Santa Fe Avenue Project, which the construction of the Project would also comply with. All grading activities require grading permits from the Department of Building and Safety, which include requirements and standards designed to limit potential erosion impacts to acceptable levels. The standard conditions imposed by the City of Los Angeles Department of Building and Safety, as specified in the Soils Report Approval Letter, will ensure that impacts to soil erosion or the loss of topsoil are reduced to less than significant levels.

Operation

The western half of the Project Site is currently developed with the 640 S. Santa Fe Avenue building, an approved four-story office building with ground floor uses. The eastern half of the Project Site, the Development Site for the Project, is currently developed as a surface parking lot for the 640 S. Santa Fe building. Aside from the 3,286 square feet of ground floor landscaped area and the 641 square feet of permeable pavement area, the Project would be covered with impervious surfaces. Thus, the majority of the Project Site would be covered with impervious surfaces. As such, nearly all surface water runoff from the Project Site would be directed to existing adjacent storm drains located on the southeast corner of Mesquit Street and Jesse Street and would not percolate into the groundwater table beneath the Project Site.[89] However, previous development on the Project Site, which included an industrial building for Value Produce and its adjacent surface parking lot, also covered the Project Site with impervious surfaces. Following completion of construction, the Project and the Project Site as a whole would continue to generate surface water runoff, and runoff would continue to be directed to existing stormwater inlets in a similar manner as the previously developed conditions, and there would not be any increased

[89] *City of Los Angeles, Bureau of Engineering, Navigate LA, website: http://navigatela.lacity.org/navigatela/, accessed August 2020.*

imperviousness of the Project Site. Thus, the Project's potential impacts to surface water runoff would be reduced to a less than significant level by incorporating stormwater pollution control measures, as set forth below, that would regulate the amount and water quality of stormwater leaving the Project Site.

In November 2012, the City of Los Angeles adopted Order No. R4-2012-0175 the NPDES Stormwater Permit for the County of Los Angeles and cities within (NPDES No. CAS004001). The primary objectives of the stormwater program requirements are to: (1) effectively prohibit non-stormwater discharge; and (2) reduce the discharge of pollutants from stormwater conveyance systems to the maximum extent practicable statutory standard. The Project would be required to comply with the City of Los Angeles Stormwater and Urban Runoff Pollution Control Ordinance (Ordinance No. 172,176, effectuated October 1998), which established LAMC Sections 64.70 through 64.70.13 and set the foundation for stormwater management in the City of Los Angeles. Since the adoption of the Stormwater and Urban Runoff Pollution Control Ordinance, many additional ordinances have passed to keep LAMC Article 4.4, Stormwater and Urban Runoff Pollution Control, up to date.

Approved in October 2011, the Low Impact Development ("LID") Ordinance (Ordinance No. 181,899) expanded LAMC Article 4.4 and expanded the applicability of the existing Standard Urban Stormwater Mitigation Plan ("SUSMP") requirements by imposing rainwater low impact development strategies on projects that require building permits. LAMC Article 4.4, including LID requirements, was amended in August 2015 with the approval of Ordinance No. 183,833, which incorporates the requirements of the Municipal Separate Storm Sewer System ("MS4") Permit. The Project would be required to comply with the City of Los Angeles Stormwater and Urban Runoff Pollution Control Ordinance (Ordinance No. 172,176, effectuated October 1998), which established LAMC Sections 64.70 through 64.70.13 and set the foundation for stormwater management in the City of Los Angeles. The Project would also be required to prepare a LID Plan and demonstrate compliance with the LID requirements and standards and retain or treat the first ¾-inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater.[90]

The Project falls within the second tier of the LID Ordinance requirements, which states that for development projects that involve non-residential uses and result in an alteration of at least 50 percent or more of the impervious surfaces on an existing developed site, the entire site must comply with the standards and requirements of Article 4.4 of Chapter VI of the LAMC and with the Development Best Management Practices Handbook. The Project shall be designed to manage and capture stormwater runoff to the maximum extent practicable utilizing various LID techniques, including but not limited to infiltration, evapotranspiration, capture for use, and treated through high removal efficiency bio-filtration/bio-treatment systems of all runoff on-site. Development and redevelopment projects are required to prepare a LID Plan, which complies with the provisions of the Development Best Management Practices Handbook. If partial or complete on-site compliance of any type is technically infeasible, the Project and LID Plan shall

[90] *City of Los Angeles, Planning and Land Development Handbook for Low Impact Development (LID), Part B Planning Activities, 5th Edition, May 9, 2016, website: https://www.lacitysan.org/cs/groups/sg_sw/documents/document/y250/mde3/~edisp/cnt017152.pdf, accessed August 2021.*

be required to manage a specified volume of stormwater runoff (Stormwater Quality Design Volume [SWQDv]) on-site in order to maximize on-site compliance. These on-site retention requirements and compliance with the LID requirements would reduce the amount of surface water runoff leaving the Project Site as compared to previous development conditions.[91]

In compliance with the LID ordinance requirements, prior to issuance of grading permits, the Applicant shall submit a LID Plan and design plans to the City of Los Angeles Department of Building and Safety and the Bureau of Sanitation Watershed Protection Division for review and approval. The Project's LID Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook. The BMPs shall be designed to retain or treat the runoff from a storm event producing ¾-inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event (whichever is greater), in accordance with the Planning and Land Development Handbook for Low Impact Development, Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect confirming that the proposed BMPs meet the numerical threshold standard shall be provided.

To ensure that all stormwater related BMPs are constructed and/or installed in accordance with the approved LID Plan, the City of Los Angeles requires a Stormwater Observation Report to be submitted to the City prior to the issuance of the Certificate of Occupancy. All projects reviewed and approved would require a Stormwater Observation Report and would be prepared, signed, and stamped by the engineer on record responsible for the approved LID Plan. With approval and issuance of a Certificate of Occupancy from LADBS, the Project would be determined to be in compliance with all applicable codes, ordinances, and other laws.[92] Full compliance with the LID requirements and implementation of design-related BMPs would ensure that the operation of the Project would not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality. Therefore, as the Project would be subject to the LID requirements and compliance procedures, operational water quality impacts would be less than significant with code compliance.

As discussed above, the Project would not violate any water quality standards or waste discharge requirements, and the operation-related impacts related to water quality will be less than significant.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less Than Significant Impact. A project would normally have a significant impact on groundwater level if it would 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

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[91] *City of Los Angeles, Planning and Land Development Handbook for Low Impact Development (LID), Part B Planning Activities, 5th Edition, May 9, 2016, accessed August 2021.*

[92] *City of Los Angeles, Planning and Land Development Handbook for Low Impact Development (LID), Part B Planning Activities, 5th Edition, May 9, 2016, accessed August 2021.*

direction of flow of groundwater; or (d) result in demonstrable and sustained reduction in groundwater recharge capacity.

As discussed previously, a majority of the Project Site has previously been and will continue to be impervious. As such, nearly all surface water runoff from the Project Site would be directed to adjacent storm drains and would not percolate into the groundwater table beneath the Project Site. Groundwater was estimated to be approximately 97.02 to 98.30 feet below ground surface in the Phase I ESA for the 640 S. Santa Fe Avenue Project. Perched groundwater was encountered at 73.2 feet bgs in the Geotechnical Report. The Project would excavate soils beneath the Project Site at approximately 32 feet below grade to allow for the construction of the two proposed subterranean parking levels and the proper base and slope for the proposed building's foundation. Because the depth of groundwater is sufficiently lower than the depth of proposed excavation, construction of the Project would not deplete groundwater supplies or interfere substantially with groundwater recharge. Further, adherence to Article 4.4 of the LAMC would ensure that the Project would not interfere with groundwater recharge. The Project would not deplete groundwater supplies, and impacts to the groundwater table would be less than significant.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i) Result in substantial erosion or siltation on- or off-site.

Less Than Significant Impact. A project would normally have a significant impact on surface water quality if discharges associated with the project would create substantial erosion, siltation, 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 NPDES stormwater permit or Water Quality Control Plan for the receiving water body.

The Project Site is located in a highly urbanized area within the City of Los Angeles, and no streams or river courses are located on or pass through the Project Site. Minor amounts of erosion and siltation could occur during grading. As previously discussed, a majority of the Project Site would be impervious. As such, most of the surface water runoff from the Project Site would be directed to adjacent storm drains along Mesquit Street and Jesse Street. The potential for soil erosion during the operation of the Project is extremely low due to the generally level topography of the Site, and because the Project would comply with the implementation of BMPs through CALGreen Section 5.106.1.2. These BMPs would identify construction Best Management Practices to be implemented to ensure that the potential for soil erosion and sedimentation is minimized, and to control the discharge of pollutants in stormwater runoff as a result of construction activities. Compliance with these regulations would ensure that impacts to soil erosion and siltation would be reduced to less than significant levels.

Further, the Geotechnical Report provided recommendations regarding temporary excavations and temporary shoring during construction of the 640 S. Santa Fe Avenue Project. As stated previously, the Project would also adhere to the recommendations of the Geotechnical Report. All grading activities require grading permits from the Department of Building and Safety, which

include requirements and standards designed to limit potential impacts to acceptable levels. The standard conditions imposed by the City of Los Angeles Department of Building and Safety, as specified in the Soils Report Approval Letter for the 640 S. Santa Fe Avenue Project, would be applicable to the Project and would ensure that impacts to soil erosion and siltation are less than significant levels. Regulatory compliance measures would ensure that runoff leaving the Project Site would not result in substantial erosion or siltation during the construction and operational phases of the Project. Therefore, impacts to substantial erosion or siltation on- or off-site would be less than significant.

ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.

Less Than Significant Impact. A project would normally have a significant impact on surface water hydrology (and the rate and amount of surface water) if it would 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, or would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems. The Project Site is located in a highly urbanized area of Los Angeles and located approximately 375 feet west of the Los Angeles River. Previously mentioned, a majority of the Project Site would be impervious, with the exception of landscaping and permeable pavement. Implementation of the Project would not increase site runoff or result in changes in the local drainage patterns. Implementation of BMPs as required in the LAMC Chapter IX Division 70, per CALGreen Section 5.106.1.2, however, would reduce the amount of surface water runoff after storm events, as the Project would be required to mitigate (infiltrate, filter, or treat) the runoff from a storm event producing ¾ inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater. The Project would not increase the rate or amount of flow from the Project Site or create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems. Impacts associated with localized drainage and surface water runoff would therefore be considered less than significant.

iii) 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; or

Less Than Significant Impact. A project would normally have a significant impact on surface water quality if discharges associated with the project would create substantial additional sources of pollution, contamination, or nuisance as defined in Section 13050 of the CWC or that cause regulatory standards to be violated, as defined in the applicable 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 which exceeds the capacity of the storm drain system serving the Project Site. A significant adverse effect would also occur if a project substantially increases the probability that polluted runoff would reach the storm drain system.

The western half of the Project Site is currently improved with a four-story office building with ground floor commercial uses with two levels of subterranean parking. The Development Site of the Project would be located on the eastern half of the Project Site, which is currently developed

as a surface parking lot for the 640 S. Santa Fe Avenue building. The Project would redevelop the surface parking lot into a 14-story office and ground floor commercial building with two levels of subterranean parking and five levels of parking above grade. Per the County of Los Angeles Department of Public Works SUSMP Review Sheet, BMPs are still required for the Project design plans, despite no increased imperviousness to the Project Site.[93] 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 Project will be required to demonstrate compliance with the LID Ordinance standards and retain or treat the first ¾ inch of rainfall in a 24-hour period, or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater, which would reduce the Project's impact to the stormwater infrastructure.

As previously mentioned, because the depth of groundwater (73.2 feet bgs encountered in Geotechnical Report) is sufficiently lower than the depth of proposed excavation (32 feet bgs), groundwater is not anticipated during construction of the two subterranean parking levels. The Project would not provide substantial additional sources of polluted runoff, and potential impacts to surface water quality would be less than significant.

iv. Impede or redirect flood flows?

No Impact. A significant impact may occur if the Project Site was located within a 100-year flood zone and would impede or redirect flood flows. The Project Site is not in an area designated as a 100-year flood hazard area.[94] A review of the Federal Emergency Management Agency ("FEMA") Flood Insurance Rate Map ("FIRM"), Map No. 06037C1636G, dated December 21, 2018, indicates that the Project Site is located in an area designated as "Zone X", described as "Areas determined to be outside the 0.2 percent flood plain."[95] The Project Site is located in a highly urbanized area and, as such no changes to the local drainage pattern would occur with implementation of the Project. The Project would not have the potential to impede or redirect floodwater flows. Therefore, no impact would occur.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Less Than Significant Impact. A significant impact would occur if the Project Site is sufficiently close to the ocean or other water body (levee or dam) to be potentially at risk of the effects of seismically-induced tidal phenomena (i.e., seiche and tsunami) and if discharges associated with

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[93] *County of Los Angeles Department of Public Works, Building and Safety Division – Drainage and Grading Section, Standard Urban Stormwater Mitigation Plan (SUSMP) Review Sheet, revised January 9, 2008, website: https://dpw.lacounty.gov/bsd/nas/library/documents/Drainage%20and%20Grading/Plan%20Check%20Documents/dg_pc~rev~-SUSMP%20Review%20Sheet%2006-13-2011.pdf, accessed August 2020.*

[94] *City of Los Angeles, Department of City Planning, General Plan Elements, Safety Element Exhibit F, website: https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf, accessed August 2020.*

[95] *Federal Emergency Management Agency (FEMA), Flood Map Service Center: Search by Address, Map Number 06037C1636G, December 21, 2008, website: https://msc.fema.gov/portal/, accessed August 2020.*

the project operation would create pollution and contamination due to inundation. Seiches are large waves generated in very large enclosed bodies of water or partially enclosed arms of the sea in response to ground shaking. Tsunamis are waves generated in large bodies of water by fault displacement or major ground movement.

The Project Site is located approximately 13.8 miles from the coast and has a relatively high elevation of 250 feet above mean sea level according to the State Water Resources Control Board GeoTracker. Therefore, tsunamis are not a hazard at the Project Site. The Project Site is located 375 feet from the Los Angeles River. FEMA National Flood Hazard Layer ("NFHL") maps indicate the Project Site is outside the 0.2% annual chance floodplain, Zone X. The potential hazard at the Project Site for flooding due to storm events or tsunamis event is, thus, considered low. According to the FEMA's FIRM, the Project Site is outside of a 100-year flood area.[96] However, a review of the City of Los Angeles General Plan Safety Element, the Project lies within a potential inundation zone mostly related to the Los Angeles River.[97] This is further supported by the Geotechnical Report, which also concluded based on FEMA's FIRM that flooding in the vicinity of the Project Site would generally be isolated to the Los Angeles River to the east. Therefore, the potential for inundation at the Project Site as a result of an earthquake-induced dam failure is considered low.

Additionally, the Project, once operational, would not use hazardous materials other than modest amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes typically associated with the operation of the Project. The use of these substances would comply with State health codes and regulations. Furthermore, the Project would be designed and constructed with the guidance of the Department of Building and Safety. The City of Los Angeles's Department of City Planning and Department of Building and Safety would review the Project prior to the issuance of a building permit and provide recommendations to ensure that any impacts from the risk release of pollutants due to inundation are less than significant. As such, the Project would result in a less than significant impact associated with the potential risk release of pollutants due to project inundation.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. A significant water quality impact could occur if a project is not consistent with the Los Angeles Region Water Quality Control Plan or the Sustainable Groundwater Management Act, or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of a Groundwater Sustainability Plan.

In 2014, the California Legislature and Governor passed the Sustainable Groundwater Management Act ("SGMA"), which encourages local agencies to take a leading role in managing their local groundwater resources. The SGMA, a collection of three bills (AB 1739, SB 1168, and SB 1319), provides local agencies with the framework necessary to sustainably manage medium and high priority groundwater basins, as described by the act, with the goal to bring the basins

[96] *Ibid.*

[97] *City of Los Angeles Department of City Planning, General Plan Safety Element, Safety Element Exhibit G: Inundation & Tsunami Hazard Areas In the City of Los Angeles, March 1994, website: https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf, accessed September 2020.*

into balance in 20 years. The intent of SGMA is to require sustainable groundwater management practices statewide, which will provide a buffer against drought and climate change. The California Department of Water Resources ("DWR") has prioritized all groundwater basins according to certain criteria established in the California Water Code. The rankings are very low, low, medium, and high. SGMA compliance requires that local agencies form Groundwater Sustainability Agencies ("GSAs") for medium- and high-priority groundwater basins no later than June 30, 2017 and adopt a Groundwater Sustainability Plan ("GSP") no later than January 31, 2022. Currently, the Project Site is located within the Coastal Plain of Los Angeles – Central basin[98], which is neither classified as a medium nor high priority groundwater basin. Therefore, the Project Site is not subject to a sustainable groundwater management plan. Nevertheless, as discussed above, adherence to Chapter VI, Article 4.4 of the LAMC would ensure that the Project would not interfere with groundwater recharge. Therefore, the Project would not deplete groundwater supplies, and impacts to the groundwater table would be less than significant.

The water quality control plan applicable to the Project is the LARWQCB Water Quality Control Plan for the Los Angeles Region ("Basin Plan"), which was adopted on June 13, 1994. The Los Angeles Regional Board's Basin Plan is designed to preserve and enhance water quality and protect the beneficial uses of all regional waters. Specifically, the Basin Plan (i) designates beneficial uses for surface and ground waters, (ii) sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the state's anti-degradation policy, and (iii) describes implementation programs to protect all waters in the Region. In addition, the Basin Plan incorporates (by reference) all applicable State and Regional Board plans and policies and other pertinent water quality policies and regulations.

As discussed previously under Question X(a), the Project, once operational, would not use hazardous materials other than modest amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes typically associated with the operation of the Project. The use of these substances would comply with State health codes and regulations. Further, the Project would comply with all federal, State, and local regulations governing stormwater discharge. Additionally, the Project would be required to comply with LAMC Chapter VI, Article 4.4 and all applicable laws and regulations pertaining to stormwater runoff and water quality. Therefore, the Project would not include potential sources of water pollutants that would have the potential to substantially degrade water quality, and impacts to water quality would be less than significant. The Project is not subject to a Groundwater Sustainability Plan and would not conflict with or obstruct implementation of the LADWP Water Quality Control Plan. Therefore, impacts would be less than significant.

Mitigation Measures

Project impacts with regard to hydrology and water quality would be less than significant. Therefore, no mitigation measures are required.

[98] *California Department of Water Resources, Groundwater Basin Boundary Assessment Tool, website: https://gis.water.ca.gov/app/bbat/, accessed November 2020.*

Cumulative Impacts

Less Than Significant Impact. Development of the Project in combination with related projects would result in the further infilling of uses in an already dense urbanized area. As discussed above, the Project Site and the surrounding areas are served by the existing City of Los Angeles drain system. Runoff from the Project Site and adjacent urban uses is typically directed into the adjacent streets, where it flows to the nearest drainage system. It is likely that most, if not all, of the related projects in the Project vicinity would also drain to the surrounding street system. However, little if any additional cumulative runoff is expected from the Project Site and the related project sites, since this part of the City is already fully developed with impervious surfaces. Under the requirements of the LID Ordinance, each related project would be required to implement stormwater BMPs to retain or treat the runoff from a storm event producing ¾ inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater. Mandatory structural BMPs in accordance with the NPDES water quality program would therefore result in a cumulative reduction to surface water runoff, as the development in the surrounding area is limited to infill developments and redevelopment of existing urbanized areas. As such, the Project would not make a cumulatively considerable contribution to impacting the volume or quality of surface water runoff, and cumulative impacts to the existing or planned stormwater drainage systems would be less than significant. Therefore, cumulative water quality impacts would be less than significant.

Mitigation Measures

Cumulative impacts with regard to hydrology and water quality would be less than significant. Therefore, no mitigation measures are required.

XI. Land Use and Planning

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	☐	☐	☐	☒
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

a) Physically divide an established community?

No Impact. A significant impact may occur if the Project would be sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community. The determination of significance shall be made on a case-by-case basis considering the following factors: (a) the extent of the area that would be impacted, the nature and degree of impacts, and the types of land uses within that area; (b) the extent to which existing

neighborhoods, communities, or land uses would be disrupted, divided or isolated, and the duration of the disruptions; and (c) the number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the Project.

The Project Site is located in an urbanized area of the Central City North Community Plan Area and is consistent with the existing physical arrangement of the properties within the vicinity of the Project Site. The zoning designation for the Project Site is M3-1-RIO (Heavy Industrial) with a General Plan land use designation of Heavy Manufacturing. As discussed in Section 3, Project Description, and as shown in Figure 3.3 and Figure 3.5, the Project Site is surrounded by other industrial manufacturing and commercial office uses. These land uses range from one- to two-stories above grade. With the exception of the LADWP substation zoned PF-1XL-RIO with a General Plan land use designation of Public Facilities, properties surrounding the Project Site are all zoned M3-1-RIO with General Plan land use designations of Heavy Manufacturing, identical to the Project Site. The Project would involve the construction of a 14-story office and ground floor commercial building with 188,954 total square feet of proposed floor area and two levels of subterranean parking along with five levels of parking above grade.

The Project would include no separation of uses or disruption of access between land use types would occur as a result of the Project. Accordingly, implementation of the Project would not disrupt or divide the physical arrangement of the established community, and no impact would occur.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact. A significant impact may occur if a project is inconsistent with the General Plan or zoning designations currently applicable to the Project Site, and would cause adverse environmental effects, which the General Plan and zoning ordinance are designed to avoid or mitigate. A significant impact may also occur if a project would conflict with any applicable land use plan, policy, or the regulations of an agency that has jurisdiction over the Project Site.

The Project Site is located within the jurisdiction of the City of Los Angeles and is therefore subject to the designations and regulations of several local and regional plans. At the regional level, the Project Site is located within the planning area of SCAG, the Southern California region's federally designated metropolitan planning organization. The Project is also located within the South Coast Air Basin and, therefore, is within the jurisdiction of the SCAQMD. At the local level, development of the Project Site is guided by the General Plan of the City of Los Angeles, the Central City North Community Plan, the LAMC, the River Improvement Overlay District (ZI-2358), and the East Los Angeles State Enterprise Zone (ZI-2129), all of which are intended to guide local land use decisions and development patterns.

Regional Plans

SCAQMD Air Quality Management Plan

The Project is located within the South Coast Air Basin ("Basin") and, therefore, falls under the jurisdiction of the SCAQMD. In conjunction with SCAG, the SCAQMD is responsible for formulating and implementing air pollution control strategies. The SCAQMD's most recent Air

Quality Management Plan ("AQMP") was updated in 2017 to establish a comprehensive air pollution control program leading to the attainment of State and federal air quality standards in the Basin, which is currently a non-attainment area (non-attainment meaning an area that does not meet the national primary or secondary ambient air quality standards for a particular pollutant or pollutants). With the approval of the requested discretionary General Plan Amendment and Height District Change, the Project would continue to conform to the zoning and land use designations for the Project Site as identified in the General Plan, and, as such, would not add emissions to the Basin that were not already accounted for in the approved AQMP. Furthermore, as noted in Section III, Air Quality, the Project would not exceed the daily emission thresholds during the construction or operational phases of the Project. Therefore, the Project would be consistent with the 2016 AQMP.

SCAG Regional Transportation Plan/Sustainable Communities Strategy

The Project Site is located within the six-county region that comprises the SCAG planning area. On September 3, 2020, SCAG adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy ("Connect SoCal"). Connect SoCal includes the long-term vision of how the SCAG region would address regional transportation and land use challenges and opportunities.

The Project would be consistent with the goals and policies set forth in Connect SoCal, as the Project would be an infill development within an existing urbanized area that would concentrate new office and commercial uses within a High Quality Transit Area ("HQTA"), which is defined as a generally walkable transit village or corridor within one half-mile of a well-serviced transit stop, or a transit corridor with 15-minute or less service frequency during peak commute hours. Additionally, the Project would be within walking distance (one-half mile) of two proposed Metro stations for a B Line/D Line extension in the Arts District. The Project would, therefore, increase the utilization of a property easily accessible by mass transit. As noted in Section 3, Project Description, the Project Site is served by multiple bus stops, some with peak commute service intervals of 15 minutes or less. Consistent with SCAG goals, the Project would increase office and commercial opportunities within a Transit Priority Area. Furthermore, the Project would result in an increase of 184,629 square feet of office space and 4,325 square feet of ground floor commercial retail and restaurant, thus generating approximately 836 office employees and 12 commercial employees, respectively.[99] As such, the Project would be consistent with SCAG's employment growth projections (see Section XIV, Population and Housing, for SCAG's growth projections).

Local Plans

City of Los Angeles General Plan

The Project would conform to objectives outlined in the City of Los Angeles General Plan ("General Plan"). The General Plan is a comprehensive, long-range declaration of purposes, policies, and programs for the development of the City. The General Plan is a dynamic document consisting of 11 elements: Framework Element, Air Quality Element, Conservation Element,

[99] *See Checklist Question XIV a) Population and Housing.*

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 is comprised of 35 community plans.

The elements that would be most applicable to the Project are the Framework Element, the Mobility Plan, and the Land Use Element. The Project Site is currently zoned M3-1-RIO, which has an FAR limit of 1.5:1. The M3 (Heavy Industrial Zone) designation corresponds with the existing Heavy Manufacturing General Plan land use designation on-site. Per LAMC Section 12.32F, Zone Change Height District Change, the Applicant is seeking a Height District Change from Height District No. 1 to Height District No. 2, which would change the zoning code from M3-1-RIO to M3-2-RIO. Approval of the Zone Change Height District Change, the allowable FAR would increase from 1.5:1 to a proposed 4.5:1 to allow for the Project's proposed floor area. This would result in an allowable total floor area of up to 310,018 square feet on the Project Site, based on a buildable lot area of 68,893 square feet. The Project would construct 188,954 total square feet of proposed floor area. Combined with the 107,224 square feet of floor area from the 640 S. Santa Fe Avenue building, the total proposed floor area for the entire Project Site would be 296,178 square feet, resulting in a total FAR of 4.3:1, within the approved limit. Of the 188,954 square feet of proposed floor area provided by the Project, 184,629 square feet would be developed as office space and the remaining 4,325 square feet would be developed as ground floor commercial retail and restaurant space.

Framework Element

The General Plan's Framework Element provides citywide guidelines and a foundation upon which Community Plans and other General Plan Elements can base their more specific goals, objectives, and policies. The General Plan's Framework Element was adopted on December 11, 1996 and re-adopted on August 8, 2001. The Framework Element and the City's community plans discuss population, housing and employment to the year 2010. The Framework Element identifies a projected population of 4.3 million people living in 1,566,108 housing units. The Citywide General Plan Framework and the Central City North Community Plan provide growth projections and Community Plan Area ("CPA") capacity, respectively, for the year 2010. The Central City North Community Plan recognizes that population, jobs, and housing within the CPA could grow more quickly, or more slowly, than anticipated, depending on economic trends.

Appendix L, Land Use Plans/Policies Consistency Analysis Tables, includes the consistency analysis with the Framework Element's goals, objectives, and policies relevant to the Project. The Project would be consistent with the Framework Economic Development Chapter's goals and objectives that focus on commercial competitiveness, job creation and retention, and economic prosperity for the City of Los Angeles. The Project is in substantial conformity with the purposes, intent, and provisions of the General Plan Framework Element and the applicable Community Plan by providing a smart growth oriented, dense urban project where such growth is best accommodated based on its proximity to mass transit. As shown in Table 1 in Appendix L, Land Use Plans/Policies Consistency Analysis Tables, the Project would not conflict with the objectives and policies set forth in the Framework Element of the General Plan.

Mobility Plan 2035

The Mobility Plan 2035 ("Mobility Plan") of the City of Los Angeles General Plan, adopted September 7, 2016, is designed to provide a policy foundation for the transportation system within the City of Los Angeles. There are five goals of the Mobility Plan that define the City's high-level mobility priorities and include: safety first; world class infrastructure; access for all Angelenos; collaboration, communication and informed choices; and clean environments and healthy communities. The Mobility Plan contains several objectives pertinent to the Project, which are identified as follows:

- Increase the number of adults and children who receive in-person active transportation safety education, in areas with the highest rates of collisions, by 10% annually;
- Ensure that 80% of street segments do not exceed targeted operating speeds by 2035;
- Increase the combined mode split of persons who travel by walking, bicycling or transit to 50% by 2035.

With respect to the Mobility Plan's stated objectives, the Project would increase commercial uses within one mile to the Transit Enhanced Network ("TEN") (the closest TEN section to the Project Site being 6th Street, located approximately 400 feet north), provide employees and patrons to several existing bus stop locations with peak commute service intervals of 15 minutes or less, and increase the combined mode split of persons who travel by walking, bicycling, or transit. As discussed in the Transportation Assessment Study (Appendix H to this IS/MND), the Project would implement a TDM program to reduce the use of single-occupant vehicle trips, encourage developers to construct transit-friendly projects, and provide efficient and effective traffic management and monitoring. Table 4 in Appendix L, Land Use Plans/Policies Consistency Analysis Tables, discusses the Project's consistency with the Mobility Plan. As shown in Appendix L, the Project would promote the goals of the Mobility Plan.

Central City North Community Plan

The Project Site is located within the Central City North Community Plan area. Therefore, all development activity on-site is subject to the land use goals, objectives, and policies of the Central City North Community Plan ("Community Plan"). The Project Site has a General Plan land use designation of Heavy Manufacturing.

The Project would redevelop the surface parking lot currently constructed on the eastern half of the Project Site into a 14-story office and commercial building with two levels of subterranean parking and five levels of parking above grade. With approval of the requested Zone Change Height District Change, the allowable FAR would increase from 1.5:1 to a proposed 4.5:1. The Project would construct 188,954 total square feet of floor area. Combined with the 107,224 square feet of floor area from the 640 S. Santa Fe Avenue building, which will remain on site under the Project, the total proposed floor area of the entire Project Site would be 296,178 square feet, resulting in a total FAR of 4.3:1, within the limit. Of the 188,954 square feet of proposed floor area for the Project, 184,629 square feet would be developed as office space, and the remaining 4,325 square feet would be developed as ground floor retail and restaurant space. Therefore, the Project

would provide an increase of approximately 756 total employees (see Section XIV. Population and Housing). A detailed analysis of the consistency of the Project with the applicable objectives and policies of the Central City North Community Plan for Commercial Land Uses is presented in Table 2 in Appendix L, Land Use Plans/Policies Consistency Analysis Tables. As shown in Appendix L, the Project would not conflict with the applicable objectives or land use policies of the Community Plan.

River Improvement Overlay District (ZI-2358)

Effectuated by Ordinance Nos. 183,144 and 183,145 in 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 development regulations and design guidelines. The purpose of the RIO District is to support the goals of the Los Angeles River Revitalization Master Plan ("LARRMP"). Specifically, the RIO Ordinance supports the LARRMP by promoting sustainable building practices and providing design guidelines. The RIO Ordinance establishes development regulations that address landscaping, screening/fencing, and exterior site lighting. Additional regulations pertaining to landscape buffers, fencing and fence heights, gates, noise, and river access also apply to properties located within the inner core, which comprises of properties adjacent to the Los Angeles River. This does not include the Project Site, as it does not have property lines that abut the Los Angeles River, nor property lines that abut a River frontage road. The RIO Ordinance also establishes a process for the City Planning Commission to adopt the River Design Guidelines, though the Guidelines are currently in draft form and have not been formally adopted.

The Project is located approximately 375 feet from the Los Angeles River within the outer core of the RIO District. The Project would conform to all applicable development regulations for projects in the outer core detailed by the RIO District, as codified in the LAMC in Section 13.17. Therefore, compliance with the LAMC Section 13.17 would ensure that the Project supports and upholds the goals of the LARRMP. Additionally, as part of Project approval, the Project is subject to the RIO District Checklist Form CP 3519 and requires RIO Administrative Clearance prior to issuance of a building permit. Thus, with approval of the RIO Administrative Clearance, the Project would be consistent with the regulations listed in LAMC Section 13.17 and the goals of the LARRMP. The Project would be designed in accordance with the LA River Design Guidelines that are applicable to the Project. A detailed analysis of the consistency of the Project with the applicable objectives and policies of the River Improvement District is presented in Table 3a in Appendix L, Land Use Plans/Policies Consistency Analysis Tables. As shown in Appendix L, the project would not conflict with the applicable objectives or land use policies of the River Improvement Overlay District.

East Los Angeles State Enterprise Zone (ZI-2129)

Enterprise Zones ("EZs") are specific geographic areas that are designed by City County resolution and have received approval from the California Department of Commerce, with the goal

to "provide economic incentives to stimulate local investment and employment through tax and regulation relief and improvement of public services."[100] Parking Standards, described in Section 12.21A4(x)(3) of the LAMC, state that projects within EZs may utilize a lower parking ratio (two (2) parking spaces for every one thousand (1,000) square feet of combined gross floor area) for certain land uses, including retail and other related uses, in order to increase the buildable areas of a parcel in older areas of the City where parcels are small. For the purposes of calculating required parking, a breakdown of 184,629 square feet of office space and 4,325 square feet of commercial retail and restaurant space was used to calculate a total of 379 parking spaces required. An additional 54 parking spaces was added to account for the 54 parking spaces currently developed as part of the surface parking lot for the 640 S. Santa Fe Avenue building on the eastern half of the Project Site, which would be displaced by construction of the Project. This increases the total to 433 required parking spaces.

Pursuant to LAMC Ordinance 185,480 and codified in LAMC 12.21.A4, for a nonresidential building, up to 20 percent of code required parking may be reduced and replaced with bicycle parking at a ratio of 1 car to 4 bicycle parking spaces. A total of 36 vehicle parking spaces were replaced with attended bicycle parking, decreasing the total required amount of vehicle parking spaces to 397 required parking spaces. As such, the Project would provide a total of 397 vehicle parking spaces. Nine vehicle parking spaces would be compliant with the Americans with Disabilities Act ("ADA"), 120 spaces would be Electric Vehicle ("EV") capable, and 40 spaces would contain EV charging stations. A maximum of 40 percent of vehicle parking spaces are allowed to be compact. A total of 39 percent (155 of 397) of the proposed vehicle parking spaces would be compact. Therefore, the Project would provide the required number of commercial office and ground floor commercial parking spaces, consistent with the requirements of the East Los Angeles Enterprise Zone. An analysis of the consistency of the Project with the applicable objective of the East Los Angeles Enterprise Zone is presented in Table 3b in Appendix L. As shown in Appendix L, the Project would not conflict with the applicable objective of the East Los Angeles Enterprise Zone.

Los Angeles Municipal Code

The Project Site is located within the City of Los Angeles, which is also subject to the applicable sections of the LAMC. The western half of the Project Site is developed with the recently constructed 640 S. Santa Fe Avenue building, an approved four-story mixed-use office building with ground floor commercial uses and two levels of subterranean parking. The eastern half of the Project Site is currently developed as a surface parking lot for the 640 S. Santa Fe Avenue building. Approval of the Project would redevelop the surface parking lot into a 14-story office and ground floor commercial building with two levels of subterranean parking and five levels of parking above grade. The Project Site is currently zoned M3-1-RIO. The Applicant is requesting a Zone Change Height District Change from Height District No. 1 to No. 2, thus increasing allowable FAR from 1.5:1 to a proposed 4.5:1 and modifying the zone code to M3-2D-RIO. The Project building would provide 188,954 square feet of total floor area. Combined with the 107,224 square feet of floor area from the 640 S. Santa Fe Avenue building, the total proposed floor area is 296,178

[100] *City of Los Angeles, Community Development Department, ZI No. 2129 Enterprise Zone / Employment and Economic Incentive Program Area (EZ), website: http://zimas.lacity.org/documents/zoneinfo/ZI2129.pdf, accessed August 2020.*

square feet for the entire Project Site, resulting in an FAR of 4.3:1, based on a buildable lot area of 68,893 square feet. Therefore, with approval of the Zone Change Height District Change, the proposed FAR on the Project Site would be within the approved 4.5:1 FAR limit.

The Applicant is also requesting a General Plan Amendment ("GPA") to modify footnotes 1 and 6 of the Community Plan. Footnote 1 shows that the Project Site is designated as within Height District No. 1. Footnote 6 states that for properties designated as Height District No. 1, development exceeding an FAR of 1.5:1 up to 3:1 may be permitted through a Zone Change Height District Change procedure, including an environmental clearance. Thus, the Applicant is requesting a GPA to include the boundaries and development standards of the Project, pursuant to LAMC Section 11.5.6. Approval of these changes would, therefore, allow the construction of the Project. The following paragraphs discuss the Project's compliance with the building standards of the LAMC.

Land Use

The Project is zoned M3-1-RIO (Heavy Industrial Zone) with a General Plan land use designation of Heavy Manufacturing. The Project would maintain the Project Site's current General Plan land use designation of Heavy Manufacturing. The Project's office and ground floor commercial uses are permitted on lots zoned M3 as a use by right. As stated previously, the Applicant is requesting a General Plan Amendment to modify footnotes 1 and 6 of the Community Plan to include the boundaries and development standards of the Project, pursuant to LAMC Section 11.5.6. Approval of these changes would, therefore, allow the construction of the Project. Therefore, with discretionary approval, the Project would comply with LAMC land use requirements.

Floor Area

As stated previously, the Project Site contains 68,893 square feet of buildable lot area. The Project would construct a total of 188,954 square feet of office and ground floor commercial uses. Combined with the 107,224 square feet of floor area from the 640 S. Santa Fe Avenue building, the total proposed floor area would be 296,178 square feet, resulting in an FAR of 4.3:1. Currently, the Project Site is designated as within Height District No. 1, which limits FAR to 1.5:1. With approval of the Zone Change Height District Change, which would change the Project Site's Height District from No. 1 to No. 2, the allowable FAR on the Project Site would increase from 1.5:1 to a proposed 4.5:1. This would permit the Project's total proposed floor area and proposed FAR. Therefore, with discretionary approval, the Project would comply with LAMC floor area requirements.

Height

As stated previously, the Project Site is located in Height District No. 1, which does not set a specific height limit for development for the Project Site. As noted above, the Applicant is seeking a Zone Change Height District Change from Height District No. 1 to Height District No. 2 allow for the Project's proposed FAR of 4.3:1. Pursuant to LAMC Section 12.21.1, neither the existing nor the proposed Height Districts assign a height limitation for the Project Site. Therefore, the Project would be within the allowed height limit. The Project proposes a maximum height of 195 feet

above grade and a total of 14 stories. Therefore, with discretionary approval, the Project would comply with LAMC height requirements.

Setbacks

Pursuant to LAMC Section 12.20, there are no front, side, or rear yard setbacks required in the M3 Zone. Nevertheless, the Project would provide an 8-foot and 6-inches front yard setback along Mesquit Street; a 16-foot and 2-inches side yard setback along Jesse Street; a 10-foot and 10-inches side yard setback along the paseo between the Project and the 640 S. Santa Fe Avenue building; and a rear yard setback of 20 feet from the LADWP substation. Therefore, the Project would comply to LAMC setback requirements.

Open Space

The Project would include the construction of a 14-story office and ground floor commercial building. As an office and commercial development, the Project is not required to provide open space. Nevertheless, the Project would provide a total of 15,547 square feet of open space, including 12,261 square feet of ground floor hardscape area (641 square feet of which would be permeable pavement) and 3,286 square feet of ground floor landscaped areas. Additionally, 3,685 square feet of open space would be provided in the roof deck as a rooftop garden area. The Project would provide planters, benches and/or other fixed seating, shrubbery, flowering plants and wall growing vines, and a total of 20 trees on the Development Site of the Project, including 13 ground level trees and 7 trees located on the rooftop garden. All trees would be planted according to the Los Angeles Urban Forestry Division requirements. Additionally, the top parking level (level 6) is proposed to function as a flexible community space when not in use for parking, such as for farmers' markets and flea markets, which would provide a temporary source of additional open space on-site. The proposed open space areas would, therefore, provide recreational space for residents of the area, employees of the building, and patrons visiting, thus reducing the Project's demand on local parks in the vicinity. Therefore, the Project would comply with LAMC open space requirements.

Vehicle Parking

Regarding commercial office uses, pursuant to LAMC 12.21.A.4.(x)(3)(6) and the requirements of the State Enterprise Zone parking standards, the Project would be required to provide two vehicle parking spaces for every 1,000 square feet of commercial office use and two vehicle parking spaces for every 1,000 square feet of ground floor commercial uses. The Project would provide a total of 188,954 total square feet of office and commercial uses, and, therefore, would be required to provide a total of 379 parking spaces. An additional 54 parking spaces was added to account for the 54 parking spaces currently developed as part of the surface parking lot for the 640 S. Santa Fe Avenue building on the eastern half of the Project Site, which would be displaced by the construction of the Project. This would increase the total to 433 required parking spaces.

Pursuant to LAMC Ordinance 185,480 and codified in LAMC 12.21.A4, for a nonresidential building, up to 20 percent of code required parking may be reduced and replaced with bicycle parking at a ratio of 1 car to 4 bicycle parking spaces. A total of 36 vehicle parking spaces were replaced with attended bicycle parking, decreasing the total required amount of vehicle parking

spaces to 397 required parking spaces. As such, the Project would provide a total of 397 vehicle parking spaces. Nine vehicle parking spaces would be compliant with the Americans with Disabilities Act ("ADA"), 120 spaces would be Electric Vehicle ("EV") capable, and 40 spaces would contain EV charging stations. A maximum of 40 percent of vehicle parking spaces are allowed to be compact. A total of 39 percent (155 of 397) of the proposed vehicle parking spaces would be compact. As such, the Project would be consistent with vehicle parking requirements of the LAMC.

Bicycle Parking

Following LAMC 12.21.A.16(a)(2), short-term and long-term bicycle parking shall be provided for office uses at a rate of one space per 10,000 square feet and one space per 5,000 square feet, respectively. Bicycle parking shall be provided for ground floor commercial (including restaurant, bar, and retail) uses at a rate of one space per 2,000 square feet for both short-term and long-term bicycle parking. As such, the Project would be required to provide a total of 19 short-term and 38 long-term bicycle parking spaces for its proposed office uses. For the proposed ground floor commercial uses, the Project is required to provide one space per 2,000 square feet for both short- and long-term bicycle parking. As such, the Project would be required to provide 2 short- and 2 long-term bicycle parking spaces for its proposed ground floor commercial uses. Therefore, the Project would be required to provide a total of 21 short-term bicycle parking spaces and 40 long-term spaces.

The Project would be consistent with the applicable bicycle parking requirements of the LAMC as amended by Ordinance No. 185,480, effective May 9, 2018, by providing 51 short-term and 95 long-term bicycle parking spaces for a total of 146 bicycle parking spaces. In the event the floor area is reduced from the current plans, the amount of vehicle and bicycle parking would be revised accordingly to meet the code requirements. As such, the Project would be consistent with the LAMC Bicycle Parking Ordinance requirements.

Industrial Land Use Policy

The City's Industrial Land Use Policy ("ILUP") project is a comprehensive study of the use of industrially zoned land within the City of Los Angeles. As part of this effort, the January 3, 2008 Memorandum on Staff Direction Regarding Industrial Land Use and Potential Conversion to Residential or Other Uses ("ILUP Memo") underscores that the City's adopted policy is to retain industrial land for job producing uses. The ILUP Memo contains "Attachment A-ILUP Geographically Specific Directions" which includes the Central City North – Alameda Industrial Area Directions Map.

According to the ILUP Geographically Specific Directions Map, the Project Site is located within Analysis Area 5 of the Central City North – Alameda Area, which is designated as an Employment Protection District ("EMP"). EMP Districts are defined as "[a]reas where industrial zoning should be maintained, i.e., where adopted General Plan, Community Plan and Redevelopment Plan industrial land use designations should continue to be implemented. Residential uses in these Districts are not appropriate." In 2006, Analysis Area 5 was characterized as having 656 acres, 541 businesses, and 5,610 jobs. Approximately 135 acres (21%) were comprised of Heavy Industry land uses, 311.3 acres (47%) were comprised of Light Industry land uses, 20.9 acres

(3%) were comprised of Commercial land uses, 3 acres (<1%) were comprised of Institutional land uses, 9.8 acres (1%) were comprised of Residential land uses, 102.8 acres (16%) were comprised of Infrastructure land uses, and 73.5 acres (11%) were comprised of Miscellaneous land uses. The staff direction in the ILUP is to "preserve industrial zoning consistent with the Central City North Community Plan; allow industrial and ancillary commercial uses only." The ILUP defines the Employment Protection District typology as "areas where industrial zoning should be maintained, and where adopted General Plan, Community Plan and Redevelopment Plan industrial land use designations should continue to be implemented. Residential uses in these Districts are not appropriate."

While neither the ILUP project nor the ILUP Memo took specific action to change any land use designations or zoning with respect to industrial land, nor was it adopted by the City Council, the ILUP Memo was intended in part to provide general long-term guidance to City staff during the updating of community plans and related rezoning considerations. As part of the general observations noted in the ILUP Survey Report for the Alameda Preliminary Staff Recommendation Map, the Project Site is located within Analysis Area 5 (sub portion of Area 3) and is specifically designated as "Light Industry". Analysis Area 5 (sub portion of Area 3) contains a variety of light to heavy industrial uses, as well as commercial services, railroad uses, storage, and residential uses. The top five industries within Analysis Area 5 (sub portion of Area 3) include wholesale trade, manufacturing, other services, apparel, and food stores.

Within the ILUP, the Alameda Preliminary Staff Recommendation Map for the Analysis Area 5 (sub portion of Area 3), which includes the location of the Project Site, concludes that industrial zoning consistent with the current Central City North Community Plan should be preserved; to allow industrial and ancillary commercial uses only; to identify and implement infrastructure plans and investment strategies to facilitate industrial uses; and not to encourage new residential uses and allow those existing residential uses to remain.

The Project would maintain its Heavy Industrial Zone of M3 and would only change the Height District from No. 1 to No. 2, thus modifying the zone code from M3-1-RIO to M3-2-RIO to allow for an increase in FAR from 1.5:1 to a proposed 4.5:1, which would allow the Project's proposed FAR of 4.3:1. Thus, the Project's industrial zoning consistent with the current Central City North Community Plan would be preserved. Additionally, the Project only proposes office and ground floor commercial retail uses, not residential uses. As shown in Table 3c, in Appendix L, Land Use Plans/Policies Consistency Analysis Tables, the Project would not conflict with the applicable land use policies and goals of the ILUP.

Citywide Design Guidelines

The Citywide Design Guidelines serve to implement the Framework Element's urban design principles and are intended as performance goals rather than zoning regulations or development standards. Although each of the Citywide Design Guidelines should be considered in a project, not all will be appropriate in every case. Because this is a proposed office and commercial Project, the Commercial Citywide Design Guidelines document was used. A detailed analysis of the consistency of the Project with the applicable objectives and policies of the Citywide Design Guidelines is presented in Table 10 in Appendix L, Land Use Plans/Policies Consistency Analysis

Tables. As shown in Appendix L, the Project would not conflict with the applicable objectives or land use policies of the Citywide Design Guidelines.

As discussed above, the Project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. As such land use impacts would be less than significant.

Mitigation Measures

Project impacts with regard to land use and planning would be less than significant. Therefore, no mitigation measures are required.

Cumulative Impacts

Less Than Significant Impact. Development of any related project is expected to occur in accordance with adopted plans and regulations. It is also expected that most of the related projects would be compatible with the zoning and land use designations of each related project site and its existing surrounding uses. In addition, it is reasonable to assume that the projects under consideration in the surrounding area would implement and support local and regional planning goals and policies. Therefore, the Project's land use impacts would not be cumulatively considerable since the Project would not conflict with applicable local or regional plans and the Project's land use impacts would be less than significant.

Mitigation Measures

Cumulative impacts with regard to land use and planning would be less than significant. Therefore, no mitigation measures are required.

XII. Mineral Resources

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

Regulatory Setting

Mineral resource sites within the City and County of Los Angeles have been classified by the State geologist as Mineral Resources Zone (MRZ), according to the known or inferred mineral potential of such sites. MRZ sites contain potentially significant sand and gravel deposits which are to be conserved. Any proposed development plan must consider access to the deposits for purposes of extraction.

City of Los Angeles General Plan Conservation Element

The Conservation Element of the General Plan consists of an identification and analysis of the existing natural resources in the City of Los Angeles. Policies of the Conservation Element include the preservation of mineral resources and of the access to these resources. Much of the area within the MRZ sites in Los Angeles was developed with structures prior to the MRZ classification and, therefore, is unavailable for extraction.

City of Los Angeles Municipal Code (LAMC)

Additionally, the Los Angeles Basin is known to be a source of petroleum. These areas are identified as an “O” (Oil Drilling) District. The 'O' Oil Drilling supplemental use district provisions of the LAMC (Section 13.01) were initially enacted in 1953. They delineate the boundaries within which surface operations for drilling, deepening, or operation of an oil well or related facilities are permitted, subject to conditions and requirements set forth in the code and by a Department of City Planning Zoning Administrator, the Fire Department, and City's petroleum administrator of the Office of Administrative and Research Services. The conditions protect surrounding neighborhoods and the environment from potential impacts, e.g., noise, hazard, spills, and visual blight. In addition, the Department of Water and Power monitors drilling operations to assure protection of water wells and aquifers. Property owners, including the City, receive oil production royalties from lands (e.g., city streets) that lie within oil drilling districts.

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. A significant impact may occur if a project site is located in an area used or available for extraction of a regionally-important mineral resource, or if the project development would convert an existing or future regionally-important mineral extraction use to another use, or if the project development would affect access to a site used or potentially available for regionally-important mineral resource extraction. The determination of significance shall be made on a case-by-case basis considering: (a) whether, or the degree to which, the project might result in the permanent loss of, or loss of access to, a mineral resource that is located in a State Mining and Geology Board Mineral Resource Zone MRZ-2 zone or other known or potential mineral resource area, and (b) whether the mineral resource is of regional or statewide significance, or is noted in the Conservation Element as being of local importance.

The Project Site is zoned M3-1-RIO. However, the Project Site is located within a Mineral Resources Zone 2 (MRZ-2).[101] The State Geologist identifies that primary mineral resources within the City of Los Angeles are rock, gravel, and sand deposits that follow the Los Angeles River flood plain. Based on the City's Environmental and Public Facilities Maps, almost the entire east side of the Downtown Los Angeles area is located within a MRZ-2 Zone. This zoning does not necessarily restrict development on the Project Site, nor does it protect mineral resources. The Project Site is not currently used for the extraction of mineral resources, and there is no evidence to suggest that the Project Site has been historically used for the extraction of mineral resources. Since no mineral extraction is occurring on-site, the development of the Project would not result in a loss of extracting mineral resources. Construction of the Project would not block or hinder access or availability of mineral resources since there are currently no extraction activities on-site and no plans to extract mineral resources. Therefore, the development of the Project would not result in the loss of availability of a known mineral resource, and no impact would occur.

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?

Less Than Significant Impact. A significant impact may occur if the Project Site is located in an area used or available for extraction of a regionally-important mineral resource, or if the development would convert an existing or future regionally-important mineral extraction use to another use, or if the development would affect access to a site used or potentially available for regionally-important mineral resource extraction. The Project Site is located within a Mineral Resources Zone 2 (MRZ-2).[102] However, the Project Site is not currently used for the extraction of mineral resources, and there is no evidence to suggest that the Project Site has historically been used for the extraction of mineral resources. The Project would not 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. As such, a less than significant impact to locally important mineral resources would occur.

Mitigation Measures

Project impacts with regard to mineral resources would be less than significant. Therefore, no mitigation measures are required.

Cumulative Impacts

Less Than Significant Impact. The analysis of cumulative impacts to mineral resources is generally site-specific. As such, the potential for cumulative impacts to occur is geographically limited. Based on the City's Environmental and Public Facilities Maps, almost the entire east side of the downtown Los Angeles area is located within a MRZ-2 Zone.[103] Therefore, cumulative development within the City of Los Angeles has the potential to impact the availability of a locally important mineral resource. Because urban uses, such as residential, office, and commercial

[101] *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.*

[102] *Ibid.*

[103] *Ibid.*

development, would generally be considered inconsistent with mineral extraction activities, development of these uses in the vicinity of mineral resource sites could hinder or preclude mineral extraction activities. Therefore, cumulative development within the region could result in the loss of availability of some mineral resources. However, the Project Site is not currently used for the extraction of mineral resources, and there is no evidence to suggest that the Project Site has historically been used for the extraction of mineral resources. The Project would not result in loss of, or loss of access to, a mineral resource. Therefore, the Project's contribution to the cumulative loss of available mineral resources or of a known mineral resource that would be of value to the region and/or the residents of the state would not be cumulatively considerable. Cumulative impacts to mineral resources would be less than significant.

Mitigation Measures

Cumulative impacts with regard to mineral resources would be less than significant. Therefore, no mitigation measures are required.

XIII. Noise

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c. For a project located within the vicinity of a private airstrip or 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?	☐	☐	☐	☒

Regulatory Setting

General Plan Noise Element

The Noise Element of the City's General Plan establishes CNEL guidelines for land use compatibility and includes a number of goals, objectives, and policies for land use planning purposes. The overall purpose of the Noise Element of the City's General Plan is to guide policymakers in making land use determinations and in preparing noise ordinances that would limit exposure of citizens to excessive noise levels.

Los Angeles Municipal Code Noise Regulations

The City has numerous ordinances and enforcement practices that apply to intrusive noise and that regulate new construction activities. The City's comprehensive noise ordinance, found in Chapter XI of the LAMC, sets forth sound measurement and criteria, minimum presumed ambient noise levels for different land use zoning classifications, sound emission levels for specific uses, hours of operation for certain uses, standards for determining when noise is deemed to be a disturbance, and legal remedies for violations. Key provisions of Chapter XI of the LAMC are discussed below.

Section 111.01 and Section 111.03 of the LAMC define the ambient noise as the actual measured ambient noise level or the City's presumed ambient noise level, whichever is greater. The actual ambient noise level is the measured noise level averaged over a period of at least 15 minutes L_{eq}. The LAMC Noise Regulations state that where the ambient noise level is less than the presumed ambient noise level designated, the presumed ambient noise level shall be deemed to be the minimum ambient noise level.

LAMC Section 112.04(b) provides that: "Except as to the equipment and operations specifically mentioned and related elsewhere in this Chapter or for emergency work as that term is defined in Section 111.01(d), and except as to aircraft, tow tractors, aircraft auxiliary power units, trains and motor vehicles in their respective operations governed by State or federal regulations, no person shall operate or cause to be operated any machinery, equipment, tools, or other mechanical or electrical device, or engage in any other activity in such manner as to create any noise which would cause the noise level on the premises of any other occupied property, or, if a condominium, apartment house, duplex, or attached business, within any adjoining unit, to exceed the ambient noise level by more than five (5) decibels.

In accordance with the LAMC, a noise level increase of 5 dBA over the existing average ambient noise level at an adjacent property line is considered a noise violation. To account for people's increased tolerance for short-duration noise events, the Noise Regulation provides a 5 dBA allowance for noise occurring more than five but less than fifteen minutes in any one-hour period and an additional 5 dBA allowance (total of 10 dBA) for noise occurring five minutes or less in any one-hour period.[104] Section 112.01 of the LAMC prohibits noise from any radio, musical instrument, phonograph, television receiver, or other machine or device for the producing, reproducing or amplification of the human voice, music, or any other sound, in such a manner, as to disturb the peace, quiet, and comfort of neighbor occupants or any reasonable person residing or working in the area or that exceeds the ambient noise level on the premises of any other

[104] *LAMC, Chapter XI, Article I, Section 111.02-(b).*

occupied property, or if a condominium, apartment house, duplex, or attached business, within any adjoining unit, by more than 5 dBA.

Section 112.02 limits increases in noise levels from air conditioning, refrigeration, heating, pumping and filtering equipment. Such equipment may not be operated in such manner as to create any noise which would cause the noise level on the premises of any other occupied property, or, if a condominium, apartment house, duplex, or attached business, within any adjoining unit, to exceed the ambient noise level by more than 5 dBA.

Section 112.05 of the LAMC prohibits the operation of any powered equipment or powered hand tool that produces a maximum noise level exceeding the specific noise limits at a distance of 50 feet from the source of the noise between the hours of 7:00 A.M. and 10:00 P.M. when the source is located within 500 feet of a residential zone.

The noise limitations above do not apply where compliance is deemed to be technically infeasible. The term technically infeasible means that said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers, and/or other noise reduction device or techniques during the operation of the equipment. The aforementioned limitations apply only to uses in residential zones or within 500 feet thereof.

Section 41.40 of the LAMC prohibits construction activity (including demolition) and repair work, where the use of any power tool, device, or equipment would disturb persons occupying sleeping quarters in any dwelling hotel, apartment, or other place of residence, between the hours of 9:00 P.M. and 7:00 A.M., Monday through Friday, and between 6 P.M. and 8 A.M. on Saturday. All such activities are also prohibited on Sundays and all federal holidays.

Fundamentals of Noise

Sound is technically described in terms of amplitude (loudness) and frequency (pitch). The standard unit of sound amplitude measurement is the decibel (dB). The decibel scale is a logarithmic scale that describes the physical intensity of the pressure vibrations that make up any sound. The pitch of the sound is related to the frequency of the pressure vibration. Since the human ear is not equally sensitive to a given sound level at all frequencies, a special frequency-dependent rating scale has been devised to relate noise to human sensitivity. The A-weighted decibel scale (dBA) provides this compensation by discriminating against frequencies in a manner approximating the sensitivity of the human ear.

Noise, on the other hand, is typically defined as unwanted sound. A typical noise environment consists of a base of steady “background” noise that is the sum of many distant and indistinguishable noise sources. Superimposed on this background noise is the sound from individual local sources. These can vary from an occasional aircraft or train passing by to virtually continuous noise from, for example, traffic on a major highway.

Several rating scales have been developed to analyze the adverse effect of community noise on people. Since environmental noise fluctuates over time, these scales consider that the effect of noise upon people is largely dependent upon the total acoustical energy content of the noise, as

well as the time of day when the noise occurs. Those that are applicable to this analysis are as follows:

> L_{eq} – An L_{eq}, or equivalent energy noise level, is the average acoustic energy content of noise for a stated period of time. Thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.
>
> L_{max} – The maximum instantaneous noise level experienced during a given period of time.
>
> L_{min} – The minimum instantaneous noise level experienced during a given period of time.
>
> CNEL – The Community Noise Equivalent Level is a 24-hour average L_{eq} with a 5 dBA "weighting" during the hours of 7:00 P.M. to 10:00 P.M. and a 10 dBA "weighting" added to noise during the hours of 10:00 P.M. to 7:00 A.M. to account for noise sensitivity in the evening and nighttime, respectively. The logarithmic effect of these additions is that a 60 dBA 24 hour L_{eq} would result in a measurement of 66.7 dBA CNEL.

Noise environments and consequences of human activities are usually well represented by median noise levels during the day, night, or over a 24-hour period. For residential uses, environmental noise levels are generally considered low when the CNEL is below 60 dBA, moderate in the 60–70 dBA range, and high above 70 dBA. Noise levels greater than 85 dBA can cause temporary or permanent hearing loss. Examples of low daytime levels are isolated, natural settings with noise levels as low as 20 dBA and quiet suburban residential streets with noise levels around 40 dBA. Noise levels above 45 dBA at night can disrupt sleep. Examples of moderate level noise environments are urban residential or semi-commercial areas (typically 55–60 dBA) and commercial locations (typically 60 dBA). People may consider louder environments adverse, but most will accept the higher levels associated with more noisy urban residential or residential-commercial areas (60–75 dBA) or dense urban or industrial areas (65–80 dBA).

It is widely accepted that in the community noise environment the average healthy ear can barely perceive CNEL noise level changes of 3 dBA. CNEL changes from 3 to 5 dBA may be noticed by some individuals who are extremely sensitive to changes in noise. A 5 dBA CNEL increase is readily noticeable, while the human ear perceives a 10 dBA CNEL increase as a doubling of sound.

According to the World Health Organization ("WHO"), sleep disturbance can occur when continuous indoor noise levels exceed 30 dBA or when intermittent interior noise levels reach 45 dBA, particularly if background noise is low. With a bedroom window slightly open (a reduction from outside to inside of 15 dB), the WHO criteria suggest that exterior continuous (ambient) nighttime noise levels should be 45 dBA or below, and short-term events should not generate noise in excess of 60 dBA. WHO also notes that maintaining noise levels within the recommended levels during the first part of the night is believed to be effective for the ability of people to initially fall asleep. Other potential health effects of noise identified by WHO include decreased performance for complex cognitive tasks, such as reading, attention span, problem solving, and memorization; physiological effects such as hypertension and heart disease (after many years of

constant exposure, often by workers, to high noise levels); and hearing impairment (again, generally after long-term occupational exposure, although shorter-term exposure to very high noise levels, for example, exposure several times a year to convert noise at 100 dBA, can also damage hearing). Finally, noise can cause annoyance and can trigger emotional reactions like anger, depression, and anxiety. WHO reports that, during daytime hours, few people are seriously annoyed by activities with noise levels below 55 dBA or moderately annoyed with noise levels below 50 dBA. Vehicle traffic and continuous sources of machinery and mechanical noise contribute to ambient noise levels. Short-term noise sources, such as truck backup beepers, the crashing of material being loaded or unloaded, car doors slamming, and engines revving outside a nightclub, contribute very little to 24-hour noise levels but are capable of causing sleep disturbance and severe annoyance. The importance of noise to receptors depends on both time and context. For example, long-term high noise levels from large traffic volumes can make conversation at a normal voice level difficult or impossible, while short-term peak noise levels, if they occur at night, can disturb sleep.[105]

Noise levels from a particular source generally decline as distance to the receptor increases. Sound from a small localized source (approximating a point source) radiates uniformly outward as it travels away from the source in a spherical pattern. The sound level attenuates or drops off at a rage of 6 dBA for each doubling of the distance. Other factors, such as the weather and reflecting or barriers, also help intensify or reduce the noise level at any given location. A commonly used rule of thumb for roadway noise is that for every doubling of distance from the source, the noise level is reduced by about 3 dBA at acoustically "hard" locations (i.e., the area between the noise source and the receptor is nearly complete asphalt, concrete, hard-packed soil, or other solid materials) and 4.5 dBA at acoustically "soft" locations (i.e., the area between the source and receptor is normal earth or has vegetation, including grass). Noise from stationary or point sources is reduced by about 6 to 7.5 dBA for every doubling of distance at acoustically hard and soft locations, respectively. In addition, noise levels are also generally reduced by 1 dBA for each 1,000 feet of distance due to air absorption. Noise levels may also be reduced by intervening structures, such as hills, manmade features, buildings, and walls. Generally, for an at-grade facility in an average residential area where the first row of buildings cover at least 40 percent of total area, the reduction provided by the first row is reasonably assumed to be 3 dBA, with 1.5 dBA for each additional row. For buildings spaced tightly, the first row provides about 5 dBA of reduction, successive rows reduced noise by 1.5 dBA per row, with a maximum reduction limit of 10 dBA.[106] Additional noise attenuation can be provided within residential structures. Depending on the quality of the original building façade, especially windows and doors, sound insulation treatments can improve the noise reduction by 5 to 20 dBA.[107]

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[105] *City & County of San Francisco Superior Court, Mission Bay Alliance v. Office of Community Investment and Infrastructure, November 29, 2016, website: https://caselaw.findlaw.com/ca-court-of-appeal/1756110.html, accessed August 2020.*

[106] *California Department of Transportation, Division of Environmental Analysis, Technical Noise Supplement, September 2013, website: https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tens-sep2013-a11y.pdf, accessed August 2020.*

[107] *Federal Transit Administration, Transit Noise and Vibration Assessment Manual, September 2018, website: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf, accessed August 2020.*

Ambient Noise Levels

To assess the existing ambient noise conditions in the area, ambient noise measurements were taken with a CASELLA CEL Sound Level Meter, which conforms to industry standards set forth in ANSI S1.4-1983 (R2001) - American National Standard Specification for Sound Level Meters. Figure 4.2, Noise Monitoring and Sensitive Receptor Location Map, depicts the noise measurement locations near the Project Site and fronting the nearby land uses as the most likely sensitive receptors to experience noise level increases during construction and at the major roadways surrounding the Project Site. The detailed noise monitoring data are presented in Appendix G, Noise Monitoring Data and Calculations Worksheets, and are summarized below in Table 4.20, Existing Ambient Daytime Noise Levels. As shown in Table 4.20, the ambient noise in the vicinity of the Project Site ranges from 66.4 to 76.1 L_{eq}. The maximum instantaneous noise level during the three 15-minute recordings was 96.1 dB L_{max} along Mesquit Street at Location C, where large trucks consistently passed by the noise monitor due to the industrial activities in the local area and construction occurring on the western portion of the Project Site. The primary noise sources that contributed most to the measured ambient noise levels were vehicle traffic during the daytime hours, including cars and delivery trucks, and the construction occurring on the western portion of the Project Site.

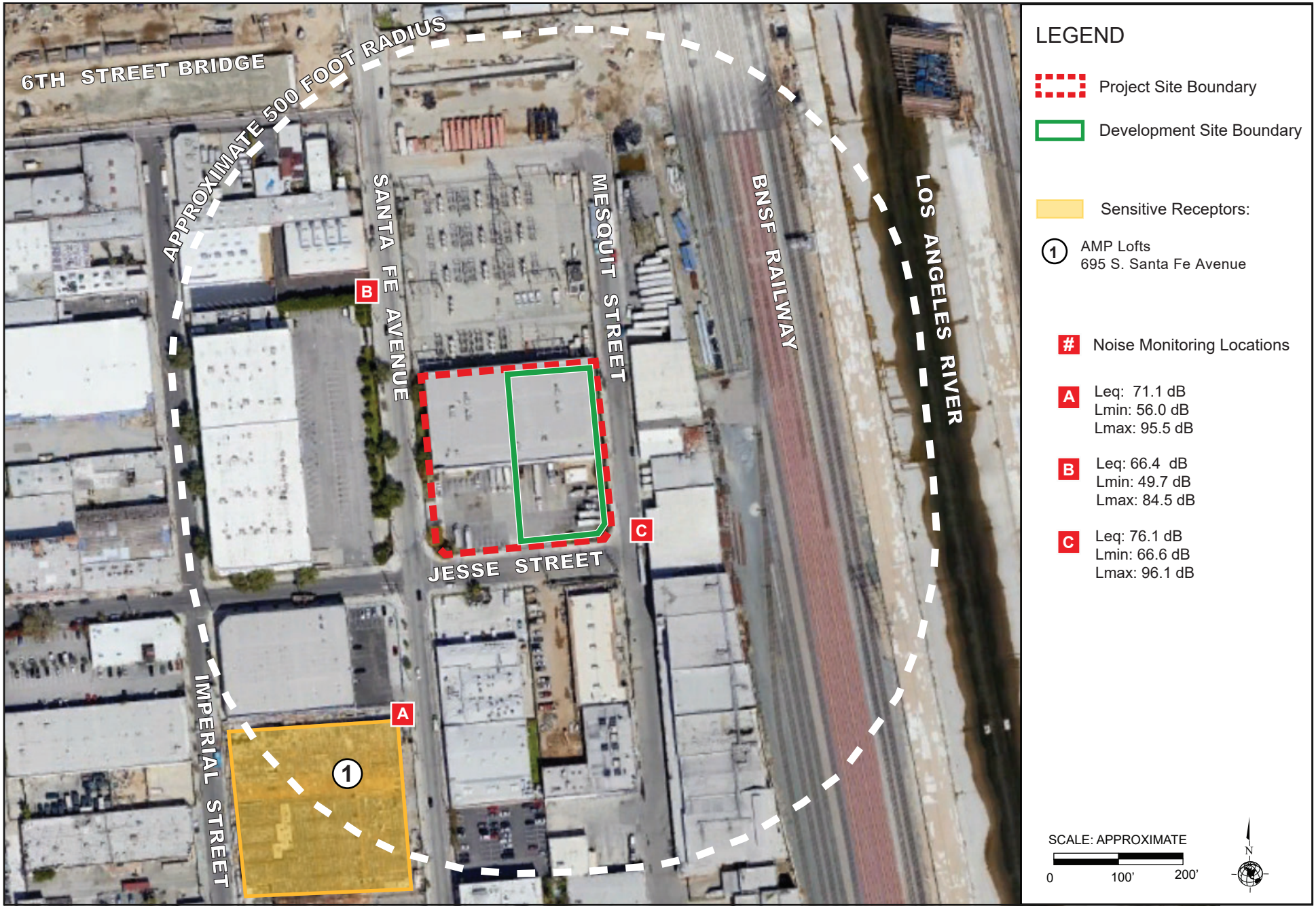
Table 4.20
Existing Ambient Daytime Noise Levels

ID	Location	Primary Noise Sources	Noise Level Statistics [a]		
			L_{eq}	L_{min}	L_{max}
A	On the west side of S. Santa Fe Avenue, at the northeast corner of AMP Lofts	Heavy delivery truck traffic, vehicle traffic	71.1	56.0	95.5
B	On the west side of S. Santa Fe Avenue, northwest of the Project Site	Heavy delivery truck traffic, vehicle traffic, construction from western portion of Project Site	66.4	49.7	84.5
C	On the east side of Mesquit Street near the southeast corner of the Project Site.	Heavy delivery truck traffic, vehicle traffic	76.1	66.6	96.1

Notes:
[a] *Noise measurements were taken on November 3, 2020 at each location for a duration of 15 minutes. See Appendix G of this IS/MND for noise monitoring data sheets.*
Source: Parker Environmental Consultants, 2020.

Sensitive Receptors

The L.A. CEQA Thresholds Guide states that residences, schools, transient lodging, libraries, churches, hospitals, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds, and parks can be considered sensitive receptors for noise analysis. Similarly, the Noise Element of the City of Los Angeles General Plan ("General Plan") defines noise sensitive land uses as: single-family and multi-unit dwellings, long-term care facilities (including convalescent and retirement facilities), dormitories, motels, hotels, transient lodging, and other residential uses; houses of worship; hospitals; libraries; schools; auditoriums; concert halls; outdoor theaters; nature and wildlife preserves; and parks.



Source: Google Earth, Aerial View, 2018.

Figure 4.2
Noise Monitoring and Sensitive Receptor Location Map

One noise sensitive land use is located adjacent to or in the vicinity of the Project. For purposes of assessing noise impacts on sensitive populations, the following sensitive receptors in close proximity (within 500 feet) to the Project Site were identified:

1) AMP Lofts, located at 695 S. Santa Fe Avenue: a mixed-use development with multi-family dwelling units.

With respect to groundborne vibration, there are no structures that share a direct property line with the Project Site. Therefore, no buildings were considered susceptible to groundborne vibration impacts. The location of the AMP Lofts building, which is 320 feet south of the Project Site, is depicted in Figure 4.2, Noise Monitoring and Sensitive Receptor Location Map. Photographs of the land uses immediately surrounding the Project Site are provided in Figure 3.5, Photographs of the Surrounding Land Uses.

Groundborne Vibration

Vibration is sound radiated through the ground. Vibration can result from a source (e.g., subway operations, vehicles, machinery equipment, etc.) causing the adjacent ground to move, thereby creating vibration waves that propagate through the soil to the foundations of nearby buildings. This effect is referred to as groundborne vibration. The peak particle velocity ("PPV") or the root mean square ("RMS") velocity is usually used to describe vibration levels. PPV is defined as the maximum instantaneous peak of the vibration level and is typically used for evaluating potential building damage. RMS is defined as the square root of the average of the squared amplitude of the level. RMS velocity in decibels ("VdB") is typically more suitable for evaluating human response.

The background vibration velocity level in residential areas is usually around 50 VdB. The vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for most people. Most perceptible indoor vibration is caused by sources within buildings such as operation of mechanical equipment, movement of people, or the slamming of doors. Typical outdoor sources of perceptible groundborne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the groundborne vibration from traffic is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings.[108]

The City has not adopted any regulations for construction or operational groundborne vibration impacts. As such, available vibration impact assessment criteria from the FTA and Caltrans are utilized to assess impacts due to ground-borne vibration.

For purposes of addressing construction-related vibration impacts on buildings, the City of Los Angeles has not adopted any policies or guidelines relative to groundborne vibration impacts. Consequently, the Caltrans Transportation and Construction Vibration Guidance Manual (April

[108] *Federal Transit Administration, Office of Planning and Environment, Transit Noise and Vibration Impact Assessment Manual, September 2018.*

2020) and Federal Transit Administration, Office of Planning and Environment, Transit Noise and Vibration Impact Assessment Manual (September 2018) were used to evaluate potential impacts related to project construction. Based on Caltrans criteria, construction impacts relative to structural damage from groundborne vibration would be considered significant if the following thresholds were to occur as shown in Table 4.21, below.

Table 4.21
Vibration Damage Potential Threshold Criteria

Threshold Criteria	Maximum PPV (in/sec)	
	Transient Sources	Continuous/Frequent Intermittent Sources
Structure and Condition		
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5

Source: California Department of Transportation, Transportation and Construction Vibration Guidance Manual, Chapter 7: Vibration Prediction and Screening Assessment for Construction Equipment, Table 19. April 2020.

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant Impact. A significant impact may occur if the Project would generate excess noise that would cause the ambient noise environment to exceed noise level standards set forth in the City of Los Angeles General Plan Noise Element ("Noise Element") and the City of Los Angeles Noise Ordinance ("Noise Ordinance"). Implementation of the Project would result in an increase in ambient noise levels during both construction and operation, as discussed in further detail below. A significant impact may also occur if the Project were to result in a substantial temporary or periodic increase or a substantial permanent increase in ambient noise levels above existing ambient noise levels without the Project.

Construction-related noise impacts upon adjacent land uses would be significant if, as indicated in LAMC Section 112.05, noise from construction equipment within 500 feet of a residential zone exceeds 75 dBA at a distance of 50 feet from the noise source.[109] However, the above noise limitation does not apply where compliance is technically infeasible. Technically infeasible means that the above noise limitation cannot be complied with despite the use of mufflers, shields, sound barriers and/or any other noise reduction device or techniques during the operation of the equipment. Furthermore, pursuant to LAMC Section 112.04(b), the Project would conflict with

[109] *As shown in Figure 3.2, Zoning and General Plan Land Use Designations, the properties surrounding the Project Site are zoned Heavy Manufacturing (M3-1-RIO) or Public Facilities (PF-1XL-RIO). Thus, LAMC Section 112.05 is not applicable to the Project. Notwithstanding the M3 zone designation, the Project's noise impacts upon adjacent residential land uses is addressed in this analysis in accordance with the L.A. CEQA Thresholds Guide.*

the LAMC if machinery, equipment, tools, or other mechanical or electrical device, or other activities create any noise which would cause the noise level on the premises of any other occupied property to exceed the ambient noise level by more than five (5) decibels.

For operational noise impacts, a project would normally have a substantial permanent increase in ambient noise levels from Project operations if the Project causes the ambient noise level measured at the property line of affected uses that are shown in Table 4.22, Community Noise Exposure Levels (CNEL), to increase by 3 dBA in CNEL to or within the "normally unacceptable" or "clearly unacceptable" category, or any 5 dBA or greater noise increase.

Table 4.22
Community Noise Exposure Levels (CNEL)

Land Use	Normally Acceptable[a]	Conditionally Acceptable[b]	Normally Unacceptable[c]	Clearly Unacceptable[d]
Single-family, Duplex, Mobile Homes	50 - 60	55 - 70	70 - 75	above 75
Multi-Family Homes	50 - 65	60 - 70	70 - 75	above 75
Schools, Libraries, Churches, Hospitals, Nursing Homes	50 - 70	60 - 70	70 - 80	above 80
Transient Lodging – Motels, Hotels	50 - 65	60 - 70	70 - 80	above 75
Auditoriums, Concert Halls, Amphitheaters	---	50 - 70	---	above 70
Sports Arena, Outdoor Spectator Sports	---	50 - 75	---	above 75
Playgrounds, Neighborhood Parks	50 - 70	---	67 - 75	above 75
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50 - 75	---	70 - 80	above 80
Office Buildings, Business and Professional Commercial	50 - 70	67 - 77	above 75	---
Industrial, Manufacturing, Utilities, Agriculture	50 - 75	70 - 80	above 75	---

[a] Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

[b] Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.

[c] Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

[d] Clearly Unacceptable: New construction or development should generally not be undertaken.

Source: Office of Planning and Research, State of California General Plan Guidelines, October 2003 (in coordination with the California Department of Health Services); City of Los Angeles, General Plan Noise Element, adopted February 1999.

Thus, a significant impact would occur if noise levels associated with operation of the Project would increase the ambient noise levels by 3 dBA CNEL at homes where the resulting noise level would be at least 70 dBA CNEL. In addition, any long-term increase of 5 dBA CNEL or more is considered to cause a significant impact. Generally, in order to achieve a 3 dBA CNEL increase in ambient noise from traffic, the volume on any given roadway would need to double. In addition

to analyzing potential impacts in terms of CNEL, the analysis also addresses increases in on-site noise sources per the provisions of the LAMC, which establishes a L_{eq} standard of 5 dBA over ambient conditions as constituting a LAMC violation.

Construction Noise

Construction of the Project would require the use of heavy equipment for demolition, site preparation, grading, excavation, the installation of utilities, paving, and building construction. During each construction phase there would be a different mix of equipment operating and noise levels would vary based on the amount of equipment in operation and the location of each activity. Table 4.22, below, identifies the representative noise levels for the types of construction equipment anticipated to be used for the Project,[110] including estimated usage factors found in the U.S. Department of Transportation, Federal Highway Administration, Roadway Construction Noise Model. The noise levels listed in Table 4.23, below, represent the A-weighted maximum sound level (L_{max}), measured at a distance of 50 feet from the construction equipment.

Table 4.23
Noise Data for Selected Construction Equipment

Construction Phases	Construction Equipment	Estimated Usage Factor %	Actual Measures Noise Level at 50 Feet (dBA L_{max})
Demolition/Clearing	Concrete/Industrial Saws (1)	20	90
	Rubber Tired Dozer (1)	40	82
	Tractor/Loader/Backhoe (2)	40	78
Grading	Excavator (1)	40	78
	Grader (1)	40	85
	Tractor/Loader/Backhoe (2)	40	78
Building Construction	Cement and Mortar Mixers (1)	40	79
	Forklifts (2)	20	75
	Generator Sets (1)	50	81
	Crane	16	81
	Pavers (1)	50	77
	Rollers (1)	20	80
	Tractor/Loader/Backhoe (1)	40	78
Architectural Coating	Aerial Lifts (2)	20	75
	Air Compressors (4)	40	78

Source: FHWA, Roadway Construction Noise Model, Construction Noise Prediction, (at Table 1 CA/T Equipment noise emissions and acoustical usage factors database, January 2006.

Construction activities associated with the Project would be expected to generate similar noise levels to those shown in Table 4.23 during the approximate 24-month construction period. It should be noted that not all construction noise equipment would be utilized concurrently during each phase and the location and spacing of heavy construction equipment and machinery would vary over the course of construction. Mobile equipment moves around the construction site with power applied in cyclic fashion (bulldozers, loaders), or to and from the Project Site (trucks).

[110] *Based on the construction equipment identified in the CalEEMod worksheets for the air quality and greenhouse gas emissions models presented in Appendices A and D to this IS/MND.*

Because the precise numbers and locations of equipment operating at the same time are not known, this analysis follows the recommended procedures contained in the Federal Transit Administration's Transit Noise and Vibration Impact Assessment Manual for a quantitative construction noise assessment. Pursuant to these procedures, the noise levels for the two loudest pieces of construction equipment were calculated from the center of the Project Site and the respective distance to each sensitive receptor.

The City of Los Angeles Building Regulations Ordinance No. 178,048 requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice is required to be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public. Pursuant to LAMC Section 41.40, exterior demolition and construction activities that generate noise are prohibited between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday. The construction activities associated with the Project would comply with the LAMC requirements.

As shown in Table 4.24, Estimated Exterior Construction Noise at Nearest Sensitive Receptors, below, the Project's construction noise levels at Sensitive Receptor No. 1 would be under the 5-dBA threshold increase due to the distance of this sensitive receptor from the Project Site. Further, construction noise levels would diminish rapidly with distance from the construction site at a rate of approximately 6 dBA per doubling of distance. In addition, the building materials used in the sensitive receptor would further attenuate construction noise for interior spaces. For example, standard building construction with closed glass windows can provide an exterior to interior noise reduction of about 20-25 dBA. Thus, construction noise would not adversely impact interior noise environments. Several noise reducing mitigation measures would also be incorporated to reduce the Project's exterior noise impacts during construction. Therefore, a substantial temporary or periodic increase in exterior ambient noise levels would not occur for the identified sensitive receptor, and thus would not be significantly impacted by the Project.

Table 4.24
Estimated Exterior Construction Noise at Nearest Sensitive Receptors

ID[a]	Ambient Noise (dBA L_{eq})[b]	Noise Level Impact (dBA Leq) by Phase [c]				Construction Noise Threshold (dBA Leq)[d]	Noise Impact Above Threshold
		Demo	Grading	Building	Architectural Coating		
1	71.1	56.1	54.4	51.1	49.9	76.1	0.0

Notes:
[a] *ID refers to the sensitive receptor location identified in Figure 4.2, Noise Monitoring and Sensitive Receptor Location Map.*
[b] *Daytime noise levels are based on actual noise measurements taken at the Project Site vicinity.*
[c] *An attenuation factor of 10 dBA was applied for sensitive receptors where buildings separate the Project Site and the associated sensitive receptor. Calculations based on the loudest two pieces of heavy construction equipment specific to each phase.*
[d] *Significance criteria is based on a 5-dBA noise increase above ambient threshold.*
Source: Parker Environmental Consultants, 2021 (see Appendix G, Noise Monitoring Data and Calculations Worksheets).

Haul Truck Noise

During the course of the combined excavation and other construction activities, it is estimated that a total of approximately 31,500 cubic yards (cy) of export soil would be exported to a landfill located within the City. The highest daily haul trips would occur during the grading/excavation phase. It is anticipated that 14 cy capacity haul trucks would be used to export soil, resulting in a total of approximately 3,286 total haul trips, or approximately 50 round trips per day (including 25 inbound and 25 outbound trips) for a projected duration of 66 hauling days. It is assumed that haul truck trips would occur uniformly predominately outside of peak hours.

The haul route departing from the Project Site to Sunshine Canyon Landfill would travel south on S. Santa Fe Avenue and west on Porter Street to the I-10 on-ramp. The haul route departing from Sunshine Canyon Landfill to the Project Site would utilize the I-10 8th Street off-ramp, travel east on 8th Street, and travel north on S. Santa Fe Avenue. A Haul Truck Route program would be described for the Project and approved by LADOT as part of the Construction Management Plan which would be imposed by LADOT as part of their standard conditions of approval. Since haul truck loading and unloading activities would occur on-site and/or within the boundaries of an approved traffic control plan and during the hours as required by the Noise Ordinance, the haul truck noise would be considered less than significant.

Construction impacts for the Project would not result in a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. As such, operational impacts would be less than significant.

Operational Noise

HVAC Equipment Noise

Upon completion and operation of the Project, on-site operational noise would be generated by heating, ventilation, and air conditioning ("HVAC") equipment installed on the new structure. However, the noise levels generated by these equipment types are not anticipated to be substantially greater than those generated by the current HVAC equipment serving the surrounding buildings in the Project vicinity. In addition, the operation of this and any other on-site stationary sources of noise would be required to comply with the LAMC Section 112.02, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than five decibels. Thus, because the noise levels generated by the HVAC equipment serving the Project would not be allowed to exceed the ambient noise level by five decibels on the premises of the adjacent properties, a substantial permanent increase in noise levels would not occur at the nearby sensitive receptors. Adherence to LAMC Section 112.02 would ensure the Project's noise impacts from HVAC equipment to be less than significant.

Trash Collection and Compactor

Further, the Project's trash collection areas and trash compactor would be located in the interior portions of the ground level (see Figure 3.8, Ground Floor Plan, of the Project Description). Trash

collection would occur in the interior portions of the ground floor, which would block the line of site to any surrounding sensitive receptors. Therefore, noise levels from trash collection and on-site trash compactor would be less than significant.

Traffic Noise

A project's mobile source impact would normally be considered significant if the project causes the ambient noise level measured at the property line of affected noise-sensitive uses to increase by 3 dBA CNEL to or within the "normally unacceptable" or "clearly unacceptable" category, or causes any 5 dBA or greater noise increase regardless of category. A doubling of existing traffic volumes on local roadways would be needed to increase the existing ambient roadway noise level by 3 dBA. Per the Project trip volumes provided in the Transportation Assessment Study contained in Appendix H to this IS/MND, the Project would result in a net increase of 11 percent and 14 percent increase in traffic volume at the intersection of S. Santa Fe Avenue and Jesse Street. At the intersection of Mesquit Street and Jesse Street, the Project would increase existing traffic volumes by 41 percent and 61 percent, respectively during the am and pm peak hours. Therefore, the increase in the roadway volume attributable to the Project would not have the potential to increase noise levels by more than 3 dBA, and roadway noise for the Project would be less than significant.

Operational impacts of the Project would not result in a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. As such, operational impacts would be less than significant.

b) Generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact.

Construction Vibration Impacts

Excavation and earthwork activities for the Project have the potential to generate low levels of groundborne vibration. The operation of construction equipment generates vibrations that propagate through the ground and diminishes in intensity with distance from the source. Vibration impacts can range from no perceptible effects at the lowest vibration levels to low rumbling sounds and perceptible vibration at moderate levels, to slight damage of buildings at the highest levels. Thus, construction activities associated with the Project could have an adverse impact on sensitive structures (i.e., building damage).

Table 4.24, Vibration Source Levels for Construction Equipment, identifies various PPV and RMS velocity (in VdB) levels for the types of construction equipment that would operate at the Project Site during construction. As shown below in Table 4.25, vibration velocities could range from 0.003 to 0.089 inch/sec PPV at 25 feet from the source activity, with corresponding vibration levels ranging from 58 VdB to 87 VdB at 25 feet from the source activity, depending on the type of construction equipment in use.

Table 4.25
Vibration Source Levels for Construction Equipment

Equipment	Approximate PPV (in/sec)					Approximate RMS (VdB)				
	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet
Large Bulldozer	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Caisson Drilling	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Loaded Trucks	0.076	0.027	0.020	0.015	0.010	86	77	75	72	68
Jackhammer	0.035	0.012	0.009	0.007	0.004	79	70	68	65	61
Small Bulldozer	0.003	0.001	0.0008	0.0006	0.0004	58	49	47	44	40

Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Final Report, 2006.

With respect to construction vibration and potential structural damage impacts, groundborne vibration is considered most hazardous to structures when construction activities would occur directly adjacent to a building façade and share a direct property. There are no buildings that share a direct property line with the Project Site. The property to the north consists of an LADWP switching yard. The nearest off-site structures to the Project Site are industrial/warehouse buildings located approximately 50 feet to the east of the Project Site, across from Mesquit Street. The industrial/warehouse buildings closest to the south of the Project Site, across Jesse Street, are located more than 60 feet away from the Development Site. Based on the anticipated vibration levels for grading equipment at a distance of 50 feet (i.e., 0.031PPV/in.sec.) and the vibration structural impact criteria identified in Table 4.21 above, it is clear that the Project's construction activities would generate vibration levels that are below the impact criteria for modern industrial commercial buildings (0.5 PPV/in.sec). As such, the Project would not have the potential to exceed the groundborne vibration thresholds for structural damage, and any groundborne vibration impacts on the surrounding buildings would be less than significant.

Operational Vibration Impacts

The Project would include an office and commercial retail development and would not involve the use of stationary equipment that would result in high vibration levels, which are more typical for large commercial and industrial projects. Although groundborne vibration at the Project Site and immediate vicinity may currently result from heavy-duty vehicular travel (e.g., refuse trucks and transit buses) on the nearby local roadways, the proposed land uses at the Project Site would not result in the increased use of these heavy-duty vehicles on the public roadways. While refuse trucks would be used for the removal of solid waste at the Project Site, these trips would typically only occur a few times a week and would not be any different than those presently occurring in the vicinity of the Project Site. The operational impacts of the Project would not have the potential to exceed the groundborne vibration thresholds for structural damage, and any groundborne vibration impacts on the surrounding buildings would be less than significant.

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

No Impact. A significant impact may occur if the Project were located within the vicinity of a private airstrip or within an airport land use plan and would introduce substantial new sources of noise or substantially add to existing sources of noise within or in the vicinity of the Project Site. There are no airports within a two-mile radius of the Project Site, and the Project Site is not located within any airport land use plan or airport hazard zone. Additionally, the Project Site is not located in the vicinity of a private airstrip. The Project would not expose people to excessive noise levels associated with airport uses. Therefore, no impact would occur.

Mitigation Measures

Project impacts with regard to noise would be less than significant. Therefore, no mitigation measures are required.

Cumulative Impacts

Less Than Significant Impact. Development of the Project in conjunction with the 26 related projects identified in Section 3, Project Description, would result in an increase in construction-related and traffic-related noise as well as on-site stationary noise sources in the already urbanized area of the City of Los Angeles. The Project Applicant has no control over the timing or sequencing of the related projects that have been identified within the Project study area. While the Project's potential noise impacts are less than significant following mitigation, it is possible that a proximate related project's noise impacts, when coupled with the noise impacts of the Project, could result in a cumulatively significant noise impact.

There are 5 related projects located within 500 feet of the Project Site: Related Project No. 12 (676 S. Mateo Street); Related Project No. 16 (670 Mesquit Street); Related Project No. 19 (640 S. Santa Fe Ave); Related Project No. 23 (2053 E. 7th Street); and Related Project No. 24 (641 Imperial Street). See Figure 3.22, Location of Related Project, in Section 3. Project Description. Related Project No. 12 has been assigned a case number, but no documentation has been formally submitted to the Department of City Planning. Related Project No. 16 has been assigned a case number and a vesting tentative tract map number and submitted initial documentation for both, but it has not been formally approved yet. Related Project No. 19 includes the 640 S. Santa Fe Avenue Project which is on the western half of the Project Site. Construction of the 640 S. Santa Fe Avenue building was completed in early 2021. Related Project No. 23 has been assigned a case number, but no documentation has been formally submitted to the Department of City Planning. Related Project No. 24 has been assigned a case number and submitted initial documentation to the Department of City Planning, but it has not been formally approved yet.

Therefore, it is anticipated that the construction of the Project could potentially have concurrent construction activities with Related Project Nos. 16, 23, and 24, depending on whether these projects obtain approval. Construction-period noise for the Project and each related project (that has not yet been built) would be localized. Each of the related projects would be required to

comply with the City's noise ordinance, as well as mitigation measures that may be prescribed pursuant to CEQA provisions that require potentially significant impacts to be reduced to the maximum extent feasible. Thus, the cumulative impact associated with construction noise would be mitigated to less than significant levels, and the Project's incremental effects would not be cumulatively considerable.

With respect to cumulative operational noise impacts, each of the related projects would be required to comply with LAMC Section 112.02, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than five decibels. Nevertheless, the siting and development of related projects would be subject to further CEQA review and evaluated on a case-by-case basis. Thus, the cumulative impact associated with operational noise would be less than significant.

Mitigation Measures

Cumulative impacts with regard to noise would be less than significant. Therefore, no mitigation measures are required.

XIV. Population and Housing

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

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

Less Than Significant Impact. A significant impact may occur if the project would locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing growth in the proposed area that would otherwise not have occurred as rapidly or in as great a magnitude. The determination of whether the project results in a significant impact on

population and housing growth shall be made considering: (a) the degree to which a project would cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of project occupancy/buildout, and that would result in an adverse physical change in the environment; (b) whether the project would introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan; and (c) the extent to which growth would occur without implementation of the project.

Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

On September 3, 2020, SCAG's Regional Council adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy ("Connect SoCal"). Connect SoCal is the culmination of a multi-year effort involving stakeholders from across the SCAG Region and balances the Southern California region's future mobility and housing needs with economic, environmental, and public health goals.

Based on the regional growth projections in Connect SoCal, the City of Los Angeles had an estimated permanent population of approximately 3,933,800 persons and approximately 1,367,000 residences in 2016. By the year 2045, SCAG forecasts that the City of Los Angeles will increase to 4,771,300 persons (or a 17.5% increase since the year 2016) and approximately 1,793,000 residences (or a 23.7% increase since the year 2016). SCAG's population and housing projections for the City of Los Angeles, Los Angeles County, and the SCAG region as a whole for 2016 and 2045 are further summarized in Table 4.26, below. Employment within the City of Los Angeles is expected to grow by 286,700 jobs, which is an approximate 13.4 percent increase in employment between 2016 and 2045.

Table 4.26
SCAG Population and Housing Projections for the City of Los Angeles, Los Angeles County, and the SCAG Region

Population			
Region	**2016**	**2045**	**% Growth (2016-2045)**
Los Angeles City	3,933,800	4,771,300	17.5%
Los Angeles County	10,110,000	11,674,000	13.3%
SCAG Region	18,832,000	22,504,000	16.3%
Households			
Region	**2016**	**2045**	**% Growth (2016-2045)**
Los Angeles City	1,367,000	1,793,000	23.7%
Los Angeles County	4,743,000	5,382,000	11.8%
SCAG Region	8,389,000	10,049,000	16.5%
Employment			
Region	**2016**	**2045**	**% Growth (2016-2045)**
Los Angeles City	1,848,300	2,135,000	13.4%
Los Angeles County	3,319,000	4,119,000	19.4%
SCAG Region	6,012,000	7,633,000	21.2%

Source: SCAG, adopted 2020-2045 RTP/SCS Growth Forecast, Connect SoCal Demographics and Growth Forecast Appendix, adopted September 2020.

On a policy level, the Project is consistent with the goals and strategies of Connect SoCal and the Compass Growth Vision Strategy discussed above, as the Project would develop what would otherwise be an underutilized surface parking lot in an existing industrial, office, and commercial area into a 14-story office and ground floor commercial building with two levels of subterranean parking and five parking levels above grade.

The Project is an infill development project within the Central City North Community Plan Area within the Arts District of the City of Los Angeles. With respect to regional growth forecasts, SCAG forecasts the City of Los Angeles Subregion will experience a population increase to 4.7 million persons by 2040. As shown in Table 4.26, above, SCAG population and housing projections from 2016 through 2045 envisions a population growth of 837,500 additional persons (an approximate 17.5% growth rate) in the City of Los Angeles and 3,672,000 additional persons (an approximate 16.3% growth rate) in the entire SCAG Region. The number of households within the City of Los Angeles is anticipated to increase by 426,000 households, or approximately 23.7% between 2016 and 2045. The number of households within the SCAG Region is anticipated to increase by 1,660,000 households, or approximately 16.5% between 2016 and 2045. The number of employment opportunities is anticipated to increase by 286,700 jobs (approximately 13.4%) in the City of Los Angeles between 2016 and 2045, and the SCAG Region is anticipated to increase by 1,621,000 jobs (approximately 21.2%) between 2016 and 2045.

The Project includes the construction of a 14-story commercial building with approximately 188,954 square feet of floor area comprised of 184,629 square feet of office uses and approximately 4,325 square feet of ground floor commercial uses. The Project would not involve the construction of any residential units. As shown in Table 4.27, the Project would generate approximately 756 jobs or employees during operations. While construction of the Project would create temporary construction-related jobs, the work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, Project-related construction workers would not be anticipated to relocate their household's place of residence as a consequence of working on the Project and, therefore, no new permanent residents would be generated during construction of the Project which could induce substantial population growth.

Given that the large workforce available in the Project vicinity and greater urban area, it is anticipated that most of the jobs generated by the Project would be filled by employees who already reside within the City of Los Angeles or County of Los Angeles. However, while jobs associated with the Project's office and commercial uses would likely be filled by employees already residing within the vicinity of the Project Site, it is also possible that some of the office and commercial jobs would be filled by persons moving into the surrounding area, which could increase the housing demand associated with the Project.

However, it is anticipated that some of this demand would be filled by vacancies in the housing market, and some from other new units in the related projects and nearby developments. Therefore, as the Project would not directly contribute to population growth in the vicinity of the Project Site, and most of the jobs and employees generated by the Project would be filled by people already residing in the vicinity of the Project Site, the potential growth associated with the Project's employees who may relocate to the surrounding area would not be substantial. As such, although the Project may result in indirect population growth with new persons relocating to the City of Los Angeles, any such indirect population growth would be well within SCAG's population growth projections. Therefore, this addition of employees would be accounted for and consistent with the SCAG forecasts for the year 2045. Therefore, the Project would not cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of Project occupancy/buildout that would result in an adverse physical change in the environment or introduce unplanned infrastructure that was not previously evaluated.

In addition, the construction of the Project would create temporary construction-related jobs. However, the work requirements of most construction projects are highly specialized so that construction workers remain at the job site only for the time frame in which their specific skills are needed to complete the particular task of the construction process. Project-related construction workers would not be likely to relocate their households near the Project Site, and therefore, no permanent residents would be generated as a result of the construction of the Project. The Project would contribute to approximately 756 new jobs/employees to Central City North CPA. The addition of 756 net jobs/employees would be consistent with SCAG's growth projections for the Los Angeles region. As such, the Project's population and housing impacts would be less than significant.

Table 4.27
Projected Employment Growth

Land Use	Size	Total Employees
Project		
Office	184,629 sf	756
Commercial (Retail)	4,325 sf	

Notes: sf = square feet
Source: Projected employment is based on the LADOT's VMT Calculator as shown in the Transportation Assessment Study for the 655 Mesquit Street Project, April 2021. (See Appendix H to this IS/MND).

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

No Impact. A significant impact may occur if the Project would result in the displacement of existing housing units, necessitating the construction of replacement housing elsewhere. The Project would redevelop an existing surface parking lot that was constructed for the 640 S. Santa Fe Avenue Project into an office and ground floor commercial building. No displacement of existing housing would occur with the Project. Thus, no impact would occur.

Mitigation Measures

Project impacts with regard to population and housing would be less than significant. Therefore, no mitigation measures are required.

Cumulative Impacts

Less Than Significant Impact. The related projects would introduce additional jobs and employment opportunities to the Project Site area. New employment from related projects could also result in population growth if new employees move to the area, resulting in direct and indirect population growth in the Project Site area.

Regarding construction, the Project, in addition to the 26 related projects identified in the Transportation Assessment, are anticipated to generate skilled construction-related jobs during the construction phases. As previously mentioned, the work requirements of many construction projects are highly specialized so that construction workers remain at a job site only for the time frame in which their specific skills are needed to complete a particular phase of the construction process. As a result, construction workers typically work at several job sites within the region throughout the year and rotate from job site to job site. Therefore, most construction workers would not be expected to relocate their place of residence as a consequence of working on the Project and related projects. As such, a substantial number of new permanent residents would not be generated as a result of the construction of the Project and related projects. Cumulative impacts associated with population growth due to temporary construction jobs would be less than significant.

Regarding operation, 17 of the 26 related projects would introduce new housing developments that would have the potential to generate additional population growth within the SCAG region. The related projects would propose 5,399 total apartment and condominium dwelling units within the City of Los Angeles. However, the Project does not propose any residential uses. Therefore, the Project would not cumulatively contribute to population and housing growth within the City of Los Angeles and the greater SCAG region. As such, the Project is not cumulatively considerable, and its impacts regarding population and housing growth would be less than significant.

Regarding employment, all 26 related projects would introduce new office, commercial, retail, restaurant, hotel, and/or industrial developments that would generate additional employment growth within the City of Los Angeles and the greater SCAG region. Table 4.28, Estimated Cumulative Employment Growth, below, shows that the Project and related projects would generate an estimated 13,326 new employees, which would be well within SCAG projections within the RTP/SCS. Further, the Project would not have a cumulative contribution to regional employment growth, as the Project would result in a net increase of 756 jobs as compared to the existing conditions. The Project would, thus, not make a cumulatively considerable incremental contribution to a significant cumulative effect. Therefore, the Project's contribution to a cumulative employment impact would be less than significant.

Table 4.28
Estimated Cumulative Employment Growth

Land Use	Quantity	Employment Generation Rate [a]	Total Employees
Related Projects			
Office	2,204,418 sf	4 emp / 1,000 sf	8,818
Commercial [b]	395,088 sf	2 emp / 1,000 sf	790
Retail	491,877 sf	2 emp / 1,000 sf	984
Restaurant [c]	286,717 sf	6.7 emp / 1,000 sf	1,921
Hotel	113 rm	0.5 emp / rm	57
Total Related Projects:	--	--	***12,570***
Project:	*188,954 sf*	--	*756*
Net Total Growth:	--	--	**13,326**

Notes: sf = square feet; emp = employees; rm = room

[a] *Employment generation rates based on LADOT's City of Los Angeles VMT Calculator Documentation, Table 1: Land Use and Trip Generation Base Assumptions, May 2020.*

[b] *The LADOT's City of Los Angeles VMT Calculation Documentation, Table 1: Land Use and Trip Generation Base Assumptions, May 2020 does not provide an employment generation rate for "Commercial" uses. Therefore, an employment generation rate of 2 employees per 1,000 square feet from General Retail was utilized.*

[c] *To provide a conservative estimate, it is assumed that all restaurant land uses would be Fast Food Restaurant land uses, which provide the highest employment generation rate.*

Source: Parker Environmental Consultants, 2021.

Mitigation Measures

Cumulative impacts with regard to population and housing would be less than significant. Therefore, no mitigation measures are required.

XV. Public Services

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire protection?	☐	☐	☒	☐
b. Police protection?	☐	☐	☒	☐
c. Schools?	☐	☐	☒	☐
d. Parks?	☐	☐	☒	☐
e. Other public facilities?	☐	☐	☒	☐

Regulatory Setting

Fire

The LAMC includes provisions for new construction projects within the City. LAMC Section 57.118 establishes LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects. Under Section 57.4705.1.6, there must be at least one elevator which shall be available for fire EMS and designed so that key switches located in the building control station/fire command center will recall elevator(s) to the designated main floors.

The Fire Code, as it pertains to the Project, specifies standards for development to ensure that adequate fire service features, such as response distance, emergency access, and fire flow, are maintained. The Fire Code specifies the maximum response distance allowed between specific sites and engine and truck companies, based upon land use and fire flow requirements.

Police

The City Charter, Administrative Code, and LAMC identify law enforcement regulations and the powers and duties of the LAPD. City Charter Article V, Section 570 gives the power and the duty to the LAPD to enforce the penal provisions of the Charter, City ordinances, and state and federal laws. The Charter also gives responsibility to the LAPD to act as peace officers and to protect lives and property in case of disaster or public calamity.

Section 22.240 of the Administrative Code requires the LAPD to adhere to the state standards described in Section 13522 of the California Penal Code, which charges the LAPD with the responsibility of enforcing all LAMC Chapter 5 regulations related to fire arms, illegal hazardous waste disposal, and nuisances (such as excessive noise), and providing support to the Department of Building and Safety Code Enforcement inspectors and the LAFD in the enforcement of the City's Fire, Building, and Health Codes.

Schools

Pursuant to California Education Code Section 17620(a)(1), the governing board of any school district is authorized to levy a fee, charge dedication, or other requirement against any construction within the boundaries of the district, for the purpose of funding the construction or reconstruction of school facilities. The Leroy F. Greene School Facilities Act of 1998 (SB 50) sets a maximum level of fees a developer may be required to pay to mitigate a project's impacts on school facilities. Pursuant to SB 50, LAUSD collects developer fees for new construction within its boundaries.

Parks

As authorized under the State Quimby Act, on September 7, 2016, the City Council approved the Parks Dedication and Fee Update Ordinance, Ordinance No. 184,505 to mitigate the park- and

open space-related impacts of new residential development projects. The Parks Dedication and Fee Update Ordinance applies to all new residential dwelling units and joint living and work quarters, except affordable housing units and secondary dwelling units in single-family zones. Since the Project consists of a parking structure development and does not include any residential component, the City's Quimby and Parkland Fees are not applicable to the Project.

Libraries

The Los Angeles Public Library Branch Facilities Plan (Facilities Plan) was adopted by the Board of Library Commissioners in 1988 and revised in 2007. The Facilities Plan guides the construction, maintenance and organization of public branch libraries.

A facility map identifying the public services in the vicinity of the Project Site is provided in Figure 4.3, below.

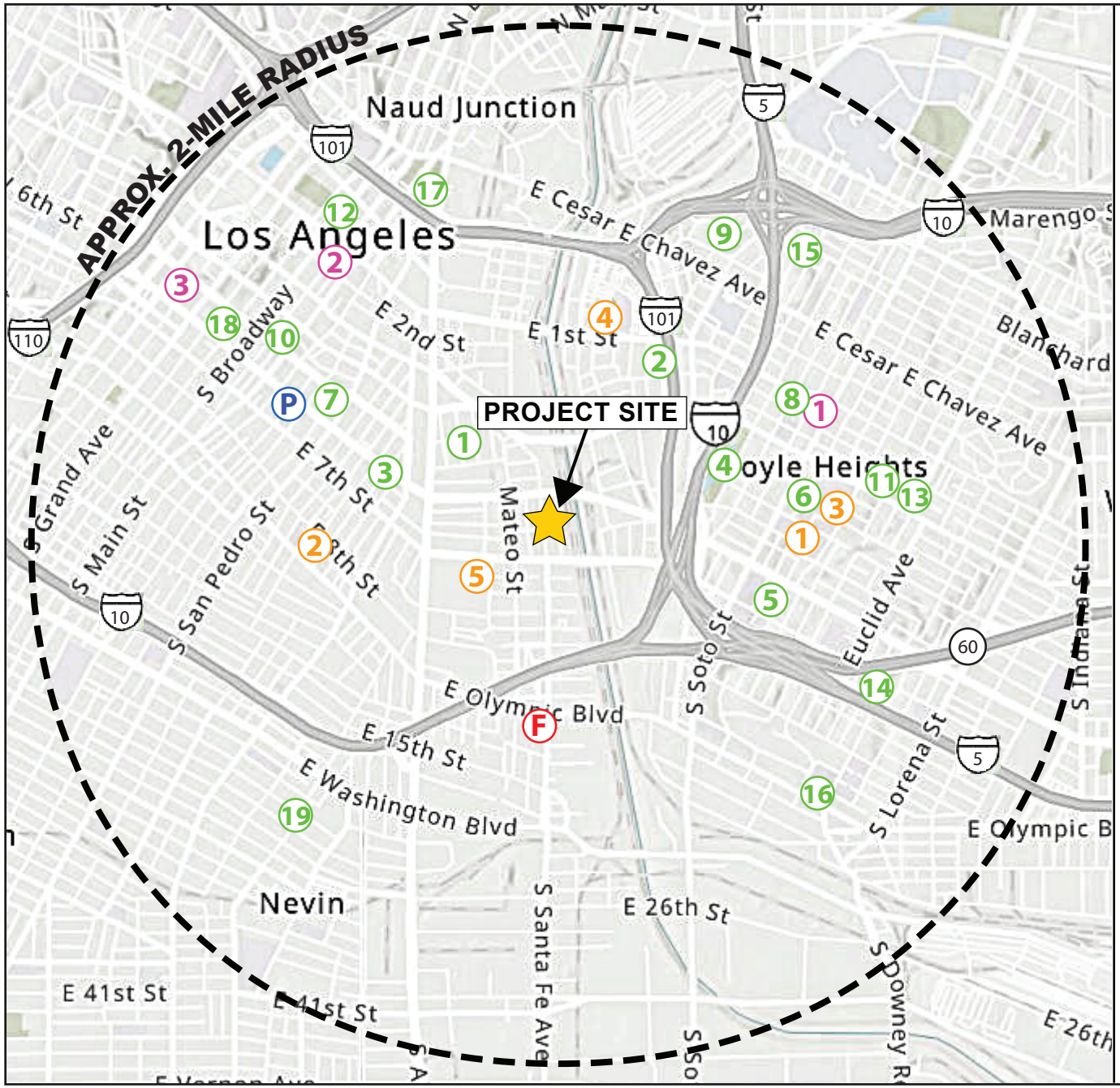
Project Impact Analysis

a) Fire protection?

Less Than Significant Impact. A project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service. Section 15382 of the CEQA guidelines defines "significant effect on the environment" as "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant." Thus, the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service would only be considered significant if such activities result in a physical adverse impact upon the environment.[111]

The City of Los Angeles Fire Department ("LAFD") considers fire protection services for a project adequate if a project is within the maximum response distance and has the minimum fire flow required for the land use proposed. Pursuant to Section 57.507.3.3, Table 507.3.3, of the 2017 City of Los Angeles Fire Code, the maximum response distance between commercial land uses and a LAFD fire station that houses an engine company or truck company is one mile or 1.5 miles, respectively. If either of these distances were exceeded, all structures located in the applicable residential or commercial area would be required to install automatic fire sprinkler systems. With such systems installed, fire protection would be considered adequate even if the project were located beyond the maximum response distance.

[111] *City of Hayward et al. v. Board of Trustees of the California State University (2015).*



LEGEND

F LAFD Station No. 17

P Central Bureau Community Police Station

\# Schools

1. Hollenbeck Middle School
2. 9th Street Elementary
3. Theodore Roosevelt Senior High
4. Felicitas and Gonzalo Mendez Senior High
5. Metropolitan High School

\# Parks

1. Arts District Park
2. Pecan Recreation Center
3. Gladys Park
4. Hollenbeck Park
5. Boyle Heights Sports Center
6. Roosevelt Pool
7. San Julian Park
8. Ross Valencia Community Park
9. Prospect Park
10. Spring Street Park
11. Boyle Heights Senior Citizen Center
12. City Hall Park Center
13. Evergreen Recreation Center
14. Ramona Garcia Recreation Center
15. State Street Recreation Center
16. Costello Senior Center
17. Los Angeles Plaza Park
18. Pershing Square
19. Central Park Recreation Center

\# Library

1. Benjamin Franklin Branch Library
2. Little Tokyo Branch Library
3. Central Library

Source: ArcGIS, 2020

Figure 4.3
Public Services in the Project Site Vicinity

Construction Impacts

Construction of the Project would increase the potential for accidental on-site fires from the operation of construction equipment and the use of flammable construction materials. The implementation of best management practices ("BMPs") for the operation of mechanical equipment and the use of flammable construction materials by construction contractors and work crews would minimize fire hazards associated with the construction of the Project. The BMPs that would be implemented during construction of the Project would include: keeping mechanical equipment in good operating condition, and, as required by law, carefully storing flammable materials in appropriate containers, and the immediate and complete cleanup of spills of flammable materials when they occur.

Construction activities also have the potential to affect fire protection services, such as emergency vehicle response times, by adding construction traffic to the street network and potentially requiring partial lane closures during street improvements and utility installations. Thus, construction could have the potential to adversely affect fire access. However, these impacts are considered to be less than significant because emergency access would be maintained to the Project Site and surrounding vicinity during construction through marked emergency access points approved by the LAFD; construction impacts are temporary in nature and do not cause lasting effects, and no complete lane closures are anticipated. Additionally, if any partial street closures are required, flag persons would be used to facilitate the traffic flow until construction is complete. Further, emergency vehicle drivers have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Construction of the Project would result in a less than significant impact.

Operation Impacts

A project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service that would result in a physical adverse impact upon the environment.

As indicated above, the City of Los Angeles Fire Department ("LAFD") considers fire protection services for a project adequate if a project is within the maximum response distance for the land use proposed or if structures located in the applicable residential area install automatic fire sprinkler systems. With such systems installed, fire protection would be considered adequate even if the Project is located beyond the maximum response distance. Although the Project is within the adequate response distance (0.9 miles), the Project would install a fire sprinkler system to ensure safety from any fire hazards that may occur within the building.

The Project would redevelop what would otherwise be an underutilized surface parking lot into a 14-story office and ground floor commercial building with two levels of subterranean parking, totaling at 188,954 square feet of floor area within the City of Los Angeles, generating a net increase of approximately 756 employees.[112] The Project would increase the utilization of the Project Site by adding additional office and commercial space and could thus potentially increase

[112] *The Project's employment generation was estimated by the City of Los Angeles Department of Transportation VMT Calculator (see Appendix H, Transportation Assessment Study to this IS/MND).*

the demand for LAFD services. The Project Site is served by LAFD Station No. 17, located at 1601 S. Santa Fe Avenue, which is approximately 0.9 miles (driving distance) south of the Project Site (see Figure 4.3, Public Services in the Project Vicinity). Based on the response distance criteria specified in LAMC 57.09.07A and the relatively short distance from Fire Station No. 17 to the Project Site, fire protection response would be considered adequate.

Furthermore, the adequacy of existing water pressure and water availability in the area of the Project would be verified by the LAFD during the plan check review process. Compliance with the Los Angeles Building Code and LAFD standards is mandatory and routinely conditioned upon projects when they are approved. Further, the Project would work with LAFD and incorporate LAFD's recommendations relative to fire safety into the building plans. As part of the Project, the Project Applicant would submit a plot plan for review and approval by the LAFD either prior to the recordation of a final map or prior to the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width and all structures must be within 300 feet of an approved fire hydrant. Thus, compliance with regulatory compliance measures regarding fire protection and safety, including installation of fire sprinklers, would ensure that any impacts upon fire services created by the Project would be less than significant.

Therefore, the Project would not result in substantial and adverse physical impacts associated with new or physically altered governmental facilities, and the impacts related to fire protection would be less than significant based on compliance with existing regulations.

b) Police protection?

Less Than Significant Impact. A significant impact may occur if the City of Los Angeles Police Department ("LAPD") could not adequately serve a project, necessitating a new or physically altered station that would result in a physical adverse impact upon the environment. Section 15382 of the CEQA guidelines defines "significant effect on the environment" as "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant." Thus, the addition of a new police station or police substation, if warranted, would only be considered significant if such activities result in a physical adverse impact upon the environment.[113]

The Project Site is currently served by LAPD Central Bureau, which oversees LAPD operations in the Central, Hollenbeck, Newton, and Rampart areas. Based on correspondence with LAPD, the Central Bureau Community Police Station, located at 251 East 6th Street, approximately 1.3 miles northeast (driving distance) and seven minutes from the Project Site (see Figure 4.3, Public Services in the Project Vicinity). The time and distance was calculated from a departure point starting from the Central Area Community Police Station. This arrival time was also configured

[113] *City of Hayward et al. v. Board of Trustees of the California State University (2015).*

utilizing some traffic delays, but estimated times of arrival can vary depending on call load, traffic delays, and types of calls.

The Central Community Police Station area is approximately 4.5 square miles, consists of 52 Reporting Districts, and includes the communities of Chinatown, Little Tokyo, South Park, Central City East, Historic Core, Financial District, Artist Lofts, Olvera Street, Jewelry District, the Convention Center, and the Fashion District. The service boundaries for Central Area are as follows: Stadium Way, Pasadena Freeway (SR-110) to the north, Washington Boulevard, 7th Street to the south, Los Angeles River to the east, and the Harbor Freeway (I-110) to the west. Within the Central Division Area, the Project is located within Reporting District (RD) 159.[114]

The Central Community Police Station has approximately 397 sworn personnel and 19 civilian support staff assigned. It is a culturally diverse community with a population of approximately 40,000 people. The officer to resident ratio is: 1 officer to 92 residents in the Central Area. Additionally, there are special service teams available within the LAPD to service the Central Area. Central Police Station's emergency response system is directly linked to the LAPD's Communications Division's Dispatch Centers. Communications Division has the responsibility to staff and answer, on a 24-hour basis, the telephones upon which calls for service are received. This includes 911 emergency calls (police, fire, and paramedic). The average response time to emergency calls for service in Central Area during 2021 was 2.9 minutes. The average response time for non-emergency calls for service in Central Area during 2021 was 21.2 minutes.[115] Table 4.29, Central Area Crime Statistics, provides crime statistics for local Project Site area in the City of Los Angeles.

Construction Impacts

Construction sites, if left unsecured, have the potential to attract trespassers and/or vandals that would potentially result in graffiti, excess trash, and potentially unsafe conditions for the public. Such occurrences would adversely affect the aesthetic character of the Project Site and surrounding area and could potentially cause public health and safety concerns. As part of the standard condition of approval issued by the Department of Building and Safety, the Applicant will be required to ensure the site is secure and does not pose a nuisance to pedestrians or adjacent property owners during construction. Temporary construction fencing shall be placed along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to keep unpermitted persons from entering the construction area. As such, with adherence to regulations and project conditions, Project impacts would be less than significant during the construction period.

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[114] *City of Los Angeles Department of City Planning, Zone Information and Map Access System, website: http://zimas.lacity.org/, accessed August 2020.*

[115] *LAPD Correspondence, 655 Mesquit Street Project [ENV-2020-6829-EIR], July 20, 2021. (See Appendix J to the IS/MND).*

Table 4.29
Central Area Profile Crime Statistics

Crimes	2020 (Year to Date)[a]	2019 (Year to Date)	2018 (Year to Date)
Violent Crimes			
Homicide	56	41	36
Rape	111	163	177
Robbery	1,264	1,524	1,570
Aggravated Assault	2,585	2,592	2,416
Property Crimes			
Burglary	1,593	1,349	1,392
Motor Vehicle Theft	3,094	2,175	2,455
BTFV	3,776	4,131	4,255
Personal / Other Theft	3,032	4,610	4,331
Total Property Crimes	11,495	12,265	12,433
Total Part 1 Crimes	15,575	15,575	16,737
Child / Spousal Abuse (Part I & II)[b]	1,774	2,088	2,153
Shots Fired	378	320	293
Shooting Victims	158	151	122

Notes:

[a] *Crime Statistics for week ending July 25, 2020.*

[b] *Part II Child/Spousal Abuse Simple Assaults not included in Part I Aggravated Assaults above to comply with the FBI's Uniform Crime Reporting guidelines.*

Source: LAPD, COMPSTAT Unit, Central Bureau Area Profile, accessed August 2020.

Operation Impacts

The Project would increase the utilization of the Project Site by developing new office and commercial space, generating a net increase of approximately 756 employees.[116] Development of the Project would result in an increase of employees, visitors, and patrons to the Project Site, thereby generating a potential increase in the number of service calls from the Project Site. Responses to thefts, vehicle burglaries, vehicle damage, traffic-related incidents, and crimes against persons would be anticipated to escalate as a result of the increased on-site activity and increased traffic on adjacent streets and arterials. The Project includes a number of design and operational features to address operational security needs. These include but are not limited to the following: exterior on-site lighting consisting of low-level illuminated pedestrian walkways and common open space areas, parking areas, and within the outdoor paseo courtyard; the Project building design incorporating LAPD's Design Out Crime Guidelines: Crime Prevention Through Environmental Design, to provide security design measures for semi-public and private spaces to eliminate dead spaces; restricting types of restaurant uses to avoid potential nuisances, limiting operational hours, and requiring adequate security to address any neighbor complaints or concerns; and providing on-site security personnel during operating hours and as needed, such

[116] *The Project's employment generation was estimated by the City of Los Angeles Department of Transportation VMT Calculator (see Appendix H, Transportation Assessment Study to this IS/MND).*

as using parking level 6 as a community space when not in use as parking. These preventative and proactive security measures would decrease the number of service calls to the LAPD.

Upon completion of the Project, the Applicant would provide the Central Area Commanding Officer with a diagram of each portion of the Project. The diagram should include access routes and any additional information that might facilitate police response. With incorporation of the security design features identified in the LAPD's "Design Out Crime Guidelines: Crime Prevention Through Environmental Design", which will be confirmed through the Site Plan Review process, the Project's potential impact upon LAPD services would be less than significant.

Therefore, the Project would not result in substantial and adverse physical impacts associated with new or physically altered governmental facilities, and the impacts related to police services would be less than significant based on compliance with existing regulations.

c) Schools?

Less Than 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 Project Site is located in LAUSD Board District 2. The Project Site is currently served by one elementary school, one middle school, and three high schools (see Figure 4.3, Public Services in the Project Vicinity).Table 4.30, Resident Schools Serving the Project Site, details the names, grades served, and location of each school.

Table 4.30
Resident Schools Serving the Project Site

School Name	Grades	Address
Hollenbeck Middle School	6-8	2510 E 6th Street
9th Street Elementary	K-5	835 Stanford Ave
Theodore Roosevelt Senior High	9-12	456 S Mathews Street
Felicitas and Gonalo Mendez Senior High	9-12	1200 Plaza Del Sol
Metropolitan High School	9-12	727 Wilson Street

Source: Los Angeles Unified School District, Resident School Identifier, website: http://rsi.lausd.net/ResidentSchoolIdentifier /, accessed August 2020.

As shown below in Table 4.31, Project Estimated Student Generation, the Project would generate approximately 94 elementary students, 26 middle school students and 51 high school students, for a total of approximately 171 students. The Project Applicant would be required to pay all applicable developer fees to the LAUSD to offset the Project's demands upon local schools. Prior to issuance of a building permit, the General Manager of the City of Los Angeles, Department of Building and Safety, or designee, shall ensure that the Applicant has paid all applicable school facility development fees in accordance with California Government Code Section 65995.

Table 4.31
Project Estimated Student Generation

Land Use [a]	Size (emp)[a]	Elementary School Students [b]	Middle School Students [b]	High School Students [b]	Total Students
Project					
Office (184,629 sf)	*756*	94	26	51	171
Commercial (4,325 sf)					

Notes: sf = square feet, emp = employee

[a] *Refer to Table 4.27, Project Employment Growth, in Section XIV. Population and Housing, of this IS/MND.*

[b] *It is assumed that 0.2249 students are generated per office and commercial retail employee (see Table 15 of the 2018 Developer Fee Justification Study). Since the LAUSD Developer Fee Justification Study does not specify the grade levels of students that are generated from non-residential land uses, the total number of students was divided among the elementary, middle, and high schools with the same ratio as the residential generation (55% elementary school, 15% middle school, and 30% high school).*

Source: Los Angeles Unified School District, 2018 Developer Fee Justification Study, March 2018.

Pursuant to Government Code Section 65995, payment of development fees authorized by SB 50 are deemed to be "full and complete school facilities mitigation." With the payment of these school development fees, the Project's potential impact upon public school services would be less than significant.

d) Parks?

Less Than Significant Impact. A significant impact would occur if the recreation and park services available could not accommodate the projected population increase resulting from implementation of a project or if the project resulted in the construction of new recreation and park facilities that create significant direct or indirect impacts to the environment. The determination of whether the project results in a significant impact on recreation and parks shall be made considering the following factors: (a) the net population increase resulting from the Project; (b) the demand for recreation and park services anticipated at the time of project buildout compared to the expected level of service available.

Parks and recreation facilities within a two-mile radius of the Project Site include: Arts District Park, Gladys Park, Boyle Heights Sports Center, Roosevelt Pool, Pecan Recreation Center, Pecan Pool, Hollenbeck Lake, Hollenbeck Park, Hollenbeck Safe Spot Skate Spot, Hollenbeck Recreation Center, San Julian Park, Ross Valencia Community Park, Spring Street Park, Costello Senior Citizen Center, Ramon Garcia Recreation Center, Lou Costello Jr. Recreation Center, Prospect Park, Evergreen Recreation Center, Costello Pool, Central Park Recreation Center, Central Pool, Los Angeles Plaza Park, Pershing Square Park, and Pershing Square. The Project would provide open space that would reduce the Project's demand upon public parks and recreational facilities.

A significant impact generally occurs if a project includes substantial population growth through residential development that could generate an increased demand in recreational and park facilities. No residential uses are proposed under the Project. The Project is expected to attract site visitors, patrons, and retailers that may increase activity in the surrounding area and surrounding recreation and park facilities. As such, the Project may result in slightly increased recreation and park use in the Project Site vicinity. Nevertheless, the increased use in daytime

recreation and park facilities would be minimal, and on-site landscaped open space areas and the rooftop garden would further serve to minimize daytime use of parks. The Project would not result in substantial and adverse physical impacts associated with new or physically altered governmental facilities, and no impacts related to parks will be less than significant.

e) Other public facilities?

Less Than Significant Impact. A significant impact may occur if a project includes substantial employment or population growth that could generate a demand for other public facilities (such as libraries), which would exceed the capacity available to serve the Project Site. The determination of whether the project results in a significant impact on libraries shall be made considering the following factors: (a) the net population increase resulting from the Project; (b) the demand for library services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to library services (renovation, expansion, addition or relocation) and the project's proportional contribution to the demand; and (c) whether the project includes features that would reduce the demand for library services (e.g., on-site library facilities or direct financial support to the Los Angeles Public Library).

Within the City of Los Angeles, the Los Angeles Public Library ("LAPL") provides library services at the Central Library, seven regional branch libraries, 56 community branches and two bookmobile units, consisting of a total of five individual bookmobiles. Approximately 6.5 million books and other materials comprise the LAPL collection. The LAPL branches currently serving the Project Site include:

- Benjamin Franklin Branch Library, located at 2200 E. 1st Street, approximately 1.7 miles northeast of the Project Site;
- Little Tokyo Branch Library, located at 203 S. Los Angeles Street, approximately 1.8 miles northwest of the Project Site;
- Central Library, located at 630 W. 5th Street, approximately 2.2 miles northwest of the Project Site.

The Project is anticipated to generate 756 employees and therefore would increase the presence of visitors, patrons, and retailers on-site and in the surrounding area. These persons may utilize surrounding neighborhood library facilities. However, any increases in the use of library facilities caused by the Project are expected to be minimal, since residents usually utilize local libraries. Moreover, the Central Library and branch libraries currently meet the library demands of the community and are anticipated to be able to meet the Project's demand for library services, because the LAPL is committed to increase the number of people who use the library services, to increase the number of library card holders and actively promote and robustly market programs and services to increase residents' overall engagement with the libraries. Therefore, the Project's impacts upon library services would be less than significant.

Mitigation Measures

Project impacts with regard to public services would be less than significant. Therefore, no mitigation measures are required.

Cumulative Impacts

Less Than Significant Impact. Development of the residential related projects is projected to generate additional employment, housing, and resident population within the study area, which would likely generate additional demands upon fire protection services, police protection services, schools, parks, and library services. As part of the City's annual budget review process, the City assesses the need for public services and allocates funds via existing mechanisms (e.g., sales taxes, government funding, and developer fees), to which the Project and related projects would contribute. The cumulative impacts upon each of the service providers is addressed below.

Fire

With respect to fire services, the Project, in combination with the related projects, could increase the demand for fire protection services in the LAFD service area. Specifically, there could be increased demands for additional LAFD staffing, equipment, and facilities over time. Over time, LAFD would continue to monitor population growth and land development throughout the City and identify additional resource needs including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. To the extent cumulative development causes the need for additional fire stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas and would not likely cause a significant impact upon the environment. Nevertheless, the siting and development of any new fire stations would be subject to further CEQA review and evaluated on a case-by-case basis.

Consistent with *City of Hayward v. Board Trustees of California State University (2015) 242 Cal.App.4th 833* ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2) the obligation to provide adequate fire protection services is the responsibility of the City. LAFD would continue to monitor population growth and land development in the City and identify additional resource needs including staffing, equipment, basic cars, other special apparatuses, and possibly station expansions or new station construction that may become necessary to achieve the required level of service. Through the City's regular budgeting efforts, LAPD's resource needs would be identified and allocated according to the priorities at the time. Further analysis, including a specific location, would be speculative and beyond the scope of this document. However, as the LAFD does not currently have any plans for new fire stations to be developed in proximity to the Project Site, the Project would not make a cumulatively considerable impact to fire protection services, and cumulative impacts upon LAFD services would be less than significant.

Police

With respect to police services, the Project, in combination with the related projects, would increase the demand for police protection services in the Project Site area. Specifically, there would be an increased demand for additional LAPD staffing, equipment, and facilities over time. To help reduce any on-site increase in demand for police services, the Project and related projects would implement comprehensive safety and design features to enhance public safety and reduce the demand for police services. In addition, the Project, as well as the related projects, would generate revenues to the City's Municipal Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new facilities and related staffing, as deemed appropriate. Furthermore, in accordance with the police protection-related goals, objectives, and policies set forth in the Framework Element, the LAPD would continue to monitor population growth and land development throughout the City and identify additional resource needs including staffing, equipment, vehicles, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City's regular budgeting efforts, the LAPD's resource needs would be identified and monies allocated according to the priorities at the time.

Consistent with *City of Hayward v. Board Trustees of California State University (2015) 242 Cal.App.4th 833* ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2) the obligation to provide adequate police services is the responsibility of the City. LAPD would continue to monitor population growth and land development in the City and identify additional resource needs including staffing, equipment, basic cars, other special apparatuses, and possibly station expansions or new station construction that may become necessary to achieve the required level of service. Through the City's regular budgeting efforts, LAPD's resource needs would be identified and allocated according to the priorities at the time. Further analysis, including a specific location, would be speculative and beyond the scope of this document. However, as the LAPD does not currently have any plans for new police stations to be developed in proximity to the Project Site, no impacts are currently anticipated to occur. On this basis, the Project would not make a cumulatively considerable impact to police protection services, and cumulative impacts on police protection would be less than significant.

Schools

With respect to cumulative impacts upon schools, the Project, in combination with related projects is expected to result in a cumulative increase in the demand for school services within the LAUSD service area. Development of the related projects would likely generate additional demands upon school services. These related projects would have the potential to generate students that would attend the same schools as the Project. However, each of the new developments would be responsible for paying mandatory school fees to mitigate the increased demand for school services. Therefore, cumulative impacts on schools would be less than significant.

Parks

With respect to cumulative impacts upon parks, development of the Project in conjunction with related projects could result in an increase in demands upon parks in the area of the Project Site. However, as an office and commercial development, the Project is expected to contribute very

little demand upon daytime park use. Additional cumulative development would contribute to lowering the City's existing parkland to population ratio, which is currently below the preferred standard. However, each of the residential related projects are required to comply with payment of Parks and Recreation Fees. Each residential related project would also be required to comply with the on-site open space requirements of the LAMC. Therefore, with payment of the applicable recreation fees on a project-by-project basis, the Project and related projects would not make a cumulatively considerable impact to parks and recreational facilities, and cumulative impacts would be less than significant.

Libraries

With respect to cumulative impacts upon library services, the Project includes the development of a 14-story office and ground floor commercial building over two levels of subterranean parking and, thus, would not directly increase residential population in the area. Development of the residential related projects is projected to generate additional housing and residents within the study area, which would likely generate additional demands upon library services. This increase in resident population would result in a cumulative increase in demands upon public library services. To meet the increased demands upon the City's Public Library system, Los Angeles voters passed a Library Bond Issue for $178.3 million to improve, renovate, expand, and construct 32 branch libraries. Since the Program's inception in 1998, the Library Department and the Department of Public Works, Bureau of Engineering have made considerable progress in the design and construction of the branch library facilities. Based on the growth forecasts utilized in the 2015-2020 Strategic Plan, much of this growth has already been accounted for in planning new and expanded library facilities. Thus, the potential increase in library use generated by the Project would not make a cumulatively considerable impact upon the City's library system. Therefore, the cumulative impacts related to library facilities would be considered less than significant.

Mitigation Measures

Cumulative impacts with regard to public services would be less than significant. Therefore, no mitigation measures are required.

XVI. 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?	☐	☐	☒	☐
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?	☐	☐	☒	☐

Regulatory Setting

As authorized under the State Quimby Act, on September 7, 2016, the City Council approved the Parks Dedication and Fee Update Ordinance, Ordinance No. 184,505 to mitigate the park- and open space-related impacts of new residential development projects. The Parks Dedication and Fee Update Ordinance applies to all new residential dwelling units and joint living and work quarters, except affordable housing units and secondary dwelling units in single-family zones. Since the Project consists of an office and ground floor commercial building and does not include any residential component, the City's Quimby and Parkland Fees are not applicable to the Project.

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?

Less Than Significant Impact. For the purpose of this Initial Study, a significant impact may occur if the project would include substantial employment or population growth, which would 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. The determination of whether the project results in a significant impact on recreation and parks shall be made considering the following factors: (a) the net population increase resulting from the proposed project; (b) the demand for recreation and park services anticipated at the time of project buildout compared to the expected level of service available.

The Project includes the construction of a 14-story commercial building with approximately 188,954 square feet of floor area comprised of 184,629 square feet of office uses and approximately 4,325 square feet of ground floor commercial uses. The Project would provide on-site open space with a landscaped roof deck to be utilized by office tenants. The Project is expected to generate a net increase of 756 jobs and would thus increase the number of visitors, patrons, and retailers to the Project Site. Any incremental need for open space as a result of the

Project would be expected to be met by the Project's 15,547 total square feet of open space areas, in addition to the 3,685 total square feet of rooftop garden space. As such, the Project would not be expected to increase demand on the surrounding area and surrounding recreation and park facilities. Any increase in recreation and park facilities use would be minimal, and a less than significant impact would occur.

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?

Less Than Significant Impact. A significant impact may occur if a project includes or requires the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment. As noted above, the Project does not include a residential component and would not directly result in the increase of residential population in the area. As such, the Project would not result in a substantial increase of recreational or park use in the area. The Project itself does not include the expansion of park facilities and does not require the construction or expansion of recreational facilities that might have an adverse impact on the environment. Therefore, a less than significant impact would occur.

Mitigation Measures

Project impacts with regard to recreation would be less than significant. Therefore, no mitigation measures are required.

Cumulative Impacts

Less Than Significant Impact. The Project in combination with the related projects would be expected to increase the cumulative demand for parks and recreational facilities in the City of Los Angeles. The related projects that include a residential component would be required to provide on-site open space and pay the Quimby fees to improve recreation and park facilities in the area and to mitigate their impacts upon park and recreational facilities. Additionally, each related project would be subject to the provisions of the LAMC for providing on-site open space, which is proportionately based on the amount of new development. Because the Project would have a less than significant incremental contribution to the potential cumulative impact on recreational resources, the Project would have a less than significant cumulative impact on such resources.

Mitigation Measures

Cumulative impacts with regard to recreation would be less than significant. Therefore, no mitigation measures are required.

XVII. Transportation

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☒	☐	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d. Result in inadequate emergency access?	☐	☐	☒	☐

The following section summarizes and incorporates by reference the information provided in the Transportation Assessment Study for 655 Mesquit Street, City of Los Angeles prepared by The Mobility Group, dated April 2021, and is provided as Appendix H to this IS/MND ("Transportation Assessment").

Regulatory Setting

California Senate Bill 743 ("SB 743"), which went into effect in January 2014, requires the Governor's Office of Planning and Research to change the way public agencies evaluate transportation impacts of projects under CEQA. Under SB 743, the focus of transportation analysis shifts from driver delay, which is typically measured by traffic level of service ("LOS"), to a new measurement, vehicle miles traveled ("VMT"), that addresses the state's goals on reduction of greenhouse gas ("GHG") emissions, creation of a multi-modal transportation network, and promotion of compact, mixed-use development patterns. On July 30, 2019, the City of Los Angeles adopted the CEQA Transportation Analysis Update, which sets forth the revised thresholds of significance for evaluating transportation impacts as well as screening and evaluation criteria for determining impacts. The CEQA Transportation Analysis Update establishes VMT as the City's formal method of evaluating a project's transportation impacts under CEQA.

LADOT most recently updated the TAG in July 2020. The CEQA thresholds provide the methodology for analyzing the Appendix G transportation thresholds, including providing the City's adopted VMT thresholds. The non-CEQA thresholds provide a method to analyze projects for purposes of entitlement review and making necessary findings to ensure the project is consistent with adopted plans and policies including Mobility Plan 2035. Specifically, the TAG is intended to effectuate a review process that advances the City's vision of developing a safe,

accessible, well-maintained, and well-connected multimodal transportation network. The TAG have been developed to identify land use development and transportation projects that may impact the transportation system; to ensure proposed land use development projects achieve site access design requirements and on-site circulation best practices; to define whether off-site improvements are needed; and to provide step-by-step guidance for assessing impacts and preparing Transportation Assessment Studies.[117]

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Less Than Significant Impact. A significant impact may occur if a project would conflict with a program plan, ordinance, or policy designed to maintain adequate effectiveness of an overall circulation system, including transit, roadway, bicycle and pedestrian facilities. In accordance with the City's TAG, a project that generally conforms with and does not obstruct the City's development policies and standards will generally be considered to be consistent. As concluded in the Transportation Assessment Study in Appendix H to this IS/MND, City documents that establish the regulatory framework, as listed in Table 2.1-1 of the TAG were reviewed to evaluate the Project's potential impacts relative to conflicts with policies, plans, or ordinances adopted specifically to mitigate or avoid an environmental impact. This evaluation identified the various elements and policies of the City of Los Angeles General Plan, including the Los Angeles Mobility Plan 2035, Plan for Healthy Los Angeles, Central City North Community Plan, River Improvement Overlay, State Enterprise Zone, Industrial Land Use Policy, LAMC Section 12.21 A.16 Bicycle Parking Requirements, LAMC Section 12.26 J Transportation Demand Management Ordinance, Vision Zero Action Plan, Vision Zero Corridor Plans, and the Citywide Design Guidelines. The evaluation in the land use plans and policy consistency tables provided in Appendix H, Transportation Assessment Study, demonstrate that the Project is in conformance with the applicable policies and programs corresponding to the Project and would not preclude the City's implementation of any adopted policy and/or program. Therefore, the Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and impacts would be less than significant.

Appendix L to this IS/MND, provides a detailed analysis of the Project's consistency with applicable plans, policies addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. As discussed in Appendix L, the Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and impacts would be less than significant.

b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b)?

Less Than Significant with Mitigation Incorporated. CEQA Guidelines Section 15064.3(b)(1) states for land use projects, vehicle miles traveled exceeding an applicable threshold of

[117] *Los Angeles Department of Transportation (LADOT) Transportation Assessment Guidelines. https://ladot.lacity.org/sites/default/files/documents/2020-transportation-assessment-guidelines_final_2020.07.27_0.pdf. Accessed March 2021.*

significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.

Vehicle-Miles-Traveled Analysis

As stated above, State of California SB 743, requires the Governor's Office of Planning and Research to change the California Environmental Quality Act (CEQA) guidelines regarding transportation impact analysis. Under SB 743, the focus of transportation analysis will shift from driver delay – typically measured by traffic level of service (LOS) – to a new measurement that better addresses the state's goals on reduction of greenhouse gas emissions (GHG), creation of multimodal transportation and promotion of mixed-use developments. Since 2014, the Governor's Office of Planning and Research has been developing guidelines and has recommended that vehicle-miles traveled (VMT) replace LOS as the primary measure of transportation impacts. Fully implemented guidelines were originally scheduled to be in place by January 1, 2016. However, an extension has allowed cities more time to establish an analysis methodology. The City of Los Angeles has updated its travel demand model, and has developed and calibrated to local conditions an impact evaluation methodology and transportation impact thresholds based on VMT. This is called the VMT Calculator. The City of Los Angeles has adopted the new CEQA methodology and thresholds as of July 30, 2019.

Transportation Assessment Screening Criteria

In accordance with LADOT, an initial assessment of the development project is conducted to determine if a VMT transportation assessment is required. A Development Project is defined as any proposed land use project that changes the use within an existing structure, creates an addition to an existing structure, or new construction, which includes any occupied floor area.

With respect to VMT, if a Project requires a discretionary action and the answer to either of the following questions is affirmative, then a VMT analysis is required.

- *T-2.1.1 Would the land use project generate a net increase of 250 or more daily vehicle trips?*

Yes. See discussion below.

- *T-2.2.2 Would the project generate a net increase in daily VMT?*

Yes. See discussion below.

For the purpose of screening for daily vehicle trips, a proposed project's daily vehicle trips are estimated using the VMT Calculator tool. If existing land uses are present on the project site or there were previously terminated land uses that meet the criteria for trip credits, the daily vehicle trips generated by the existing or qualified terminated land uses can be estimated using the VMT

Calculator tool and subtracted from the Project's daily vehicle trips to determine the increase in daily vehicle trips.

As calculated by the VMT calculator, the Project's 184,629 square feet of office uses and 4,325 square feet of retail commercial would generate 2,086 daily vehicle trips. The Project is expected to generate a net increase of 2,086 daily trips and thus a project VMT analysis is required.

VMT Thresholds

The LADOT VMT Calculator analyzes in terms of Household VMT per Capita, and Work VMT per Employee. LADOT has identified thresholds for significant VMT impacts by subarea of the city. For this area of the City the following thresholds have been identified:

Household VMT per Capita: 6.0

Work VMT per Employee: 7.6

VMT Analysis with Project

The operational VMT impacts of the Project were quantified using DOTs VMT Calculator tool *(Version 1.3)* for the Project is presented in further detail below.

As calculated by the VMT calculator, the Project would generate a total of 2,074 daily vehicle trips, resulting in 15,430 daily VMT without mitigation. With mitigation, the Project would generate a total of 1,887 daily vehicle trips, resulting in 13,965 daily VMT.

The VMT impacts relative to the household per capita VMT threshold and work per capita thresholds with and without mitigation are summarized in Table 4.32, below. The results show that with the Project, the Household VMT per Capita would be 0 compared to the threshold of 6.0, and the Work VMT per Capita would be 9.0 compared to the threshold of 7.6. Therefore, it is concluded that the Project would cause significant VMT impacts for Work VMT.

Table 4.32
Project VMT Impacts With and Without Mitigation

Category	Household			Work		
Scenario	Household VMT Threshold	Household VMT Per Capita	Significant Impact?	Work VMT Threshold	Work VMT Per Capita	Significant Impact?
VMT with Project	6.0	0.0	No	7.6	9.0	Yes
VMT with Project and Mitigation	6.0	0.0	No	7.6	7.5	No

Note: VMT calculations excludes the 5,000 sq. ft. of retail/restaurant space as local serving retail, per LADOT guidelines.
Source: The Mobility Group, Transportation Assessment Study for 655 Mesquit Street, Los Angeles, April 2021 (see Appendix H to this IS/MND).

Project Design Features and Mitigation Measures

The VMT Calculator provides for inputs relating to trip reduction measures (TDM strategies), either as project design features or as project mitigations. The following trip reducing mitigations are necessary and were included in the analysis.

- Parking - Price Workplace Parking (50% of employees assumed eligible, $6 daily parking charge assumed)
- Education & Encouragement - Promotions and Marketing (100% of employees eligible)
- Commute Trip Reductions - Ride-share program (100% of employees eligible)
- Bicycle Infrastructure - Provide bicycle parking per LAMC

With the proposed mitigation program, the Project Work VMT would be 7.5, which would not exceed the threshold and there would be no significant VMT impacts.

Mitigation Measures:

MM-TR-1: Transportation Demand Management (TDM) Strategies

The Project shall integrate the following additional TDM strategies:

- Parking - Price Workplace Parking (50% of employees assumed eligible, $6 daily parking charge assumed)
- Education & Encouragement - Promotions and Marketing (100% of employees eligible)
- Commute Trip Reductions - Ride-share program (100% of employees eligible)
- Bicycle Infrastructure - Provide bicycle parking per LAMC

Cumulative Impacts

The Project falls under the VMT impact threshold and so aligns with the long term VMT and greenhouse gas emissions goals of SCAG's RTP/SCS. There would therefore be no cumulative impacts.

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

Less Than Significant Impact. A significant impact may occur if the 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 were designed in such a way as to create hazard conditions. The Project would not include unusual or hazardous design features.

Screening Criteria

Pursuant to the Project Screening criteria in the TAG, if a project requires discretionary action and the answer is yes to either of the following questions, then further evaluation is required to assess whether the project would result in impacts due to geometric design hazards or incompatible uses.

- *Is the project proposing new driveways, or introducing new vehicle access to the property from the public right-of-way?*

Yes. The project is proposing a new driveway on Mesquit Street. It will also utilize an approved driveway for the 640 S. Santa Fe Avenue Project.

- *Is the project proposing to make any voluntary or required modifications to the public right-of-way (i.e. street dedications, reconfigurations of curb lines, etc.)?*

No. The project is therefore required to conduct further evaluation.

Access to the Project Site would be provided via a two-way internal driveway between S. Santa Fe Avenue and Mesquit Street along the northern edge of the site, as shown in Figure 3.8. The internal driveway would access S. Santa Fe Avenue and Mesquit Street, with full movements at both street driveways. The internal driveway would utilize the existing driveway for the 640 S. Santa Fe Avenue Project so it would not constitute a new driveway. Therefore, the Project would have a less than significant impact related to substantially increasing roadway hazards due to geometric design features or incompatible uses.

Impact Analysis

The driveways will both be perpendicular to the street, with no sharp curves, or visibility issues. Landscape design will also ensure there will be no impediments to visibility of and by vehicles, bicycles and pedestrians. The Project Site is essentially flat. There are no slopes, curves, landscaping or other barriers that would impede visibility or that could result in vehicle/pedestrian, vehicle/bicycle, or vehicle/vehicle impacts.

The LADOT Driveway Design Guidelines (Manual of Policies and Procedures Section 321) recommended driveway width for two-way driveways for commercial projects is 30 feet. The new driveway on Mesquit Street will be two-way with one lane in each direction and is proposed to be 30 feet wide. This driveway would be located approximately 280 feet away from the interaction of Mesquit Street and Jesse Street, thereby exceeding the 75 foot minimum distance required from the adjacent intersection, per the Driveway Design Guidelines. Parking entry control and security gate would be occur at two internal driveways within the Project Site. The same characteristics exist for the existing driveway on S. Santa Fe Avenue that will be utilized by the Project.

The Project would not make any changes to the roadway system that would impact the High Injury Network or Safe Routes to School (there are no safe routes to school adjacent to the Project). The Project would not substantially increase hazards due to a geometric design feature. As such, impacts would be less than significant.

Cumulative Impacts

The previously approved and constructed 640 S. Santa Fe Avenue Project is part of the Project Site and adjacent to and to the west of the proposed Development Site. These two Projects are designed to share parking spaces accessed via shared driveways. Therefore, the Project access would not conflict with access for the 640 S. Santa Fe Avenue Project. In conclusion, there would be no cumulative impacts regarding substantially increasing hazards due to geometric design features or incompatible use.

d) Result in inadequate emergency access?

Less Than Significant Impact. A significant impact may occur if the project design would not provide emergency access meeting the requirements of the LAFD, or in any other way threatened the ability of emergency vehicles to access and serve the Project Site or adjacent uses. As previously discussed, the Project Site is not located in a disaster route according to the Los Angeles Central Area Disaster Route Map of Los Angeles County.[118] Additionally, based on the City of Los Angeles Safety Element, the Project Site is not located on an identified disaster route or an adopted emergency response or evacuation plan.[119]

Development of the Project may require temporary and/or partial street closures due to construction activities. Nonetheless, while such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans. The Project would not cause permanent alterations to vehicular circulation routes and patterns, impede public access, or travel upon public rights-of-way. Further, the Project would be developed in a manner that satisfies the emergency response requirements of the LAFD. There are no hazardous design features included in the access design or site plan for the Project that could impede emergency access. Furthermore, the Project would be subject to the site plan review requirements of the LAFD and the LAPD to ensure that all access roads, driveways and parking areas would remain accessible to emergency service vehicles. Further, emergency vehicle drivers have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. The Project would not result in inadequate emergency access. As such, impacts would be less than significant.

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[118] *Los Angeles County Department of Public Works, City of Los Angeles Central Area Disaster Route Map, August 13, 2008, website: http://dpw.lacounty.gov/dsg/DisasterRoutes/map/Los Angeles Central Area.pdf, accessed August 2020.*

[119] *City of Los Angeles, Safety Element Exhibit H, Critical Facilities and Lifeline Systems in the City of Los Angeles, November 1996, website: https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf, accessed August 2020.*

XVIII. 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:

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

Regulatory Setting

Recognizing that California Native American tribes traditionally and culturally affiliated with a geographic area may have expertise concerning their tribal cultural resources, the Native American Historic Resource Protection Act (Assembly Bill 52, or AB 52) was signed into law on September 25, 2014. AB 52 applies specifically to projects for which a Notice of Preparation or a Notice of Intent to Adopt a Negative Declaration or Mitigated Negative Declaration is filed on or after July 1, 2015. AB 52 amended PRC Section 5097.94 and added PRC Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. The primary intent of AB 52 was to involve California Native American Tribes early in the environmental process and to establish a new category of resources related to Native Americans, that require consideration under CEQA, known as tribal cultural resources.

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

Potentially Significant Impact Unless Mitigation Incorporated. 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." 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. Public Resources Code 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 Section V, Cultural Resources, the Project Site and immediate surrounding areas do not contain any known archaeological resources.[120,121] While there are currently no recorded archaeological sites within the Project Site area, buried resources could potentially be unearthed during project activities.

The Project would include excavation and grading to ensure the proper base and slope for the two levels of subterranean parking and the proposed building foundation. Thus, there would be a potential for the accidental discovery of unknown and unrecorded archaeological materials, including tribal cultural resources. As such, it would be possible that unknown tribal cultural resources could be discovered during construction of the Project, and if proper care is not taken during construction, damage to or destruction of these unknown remains could occur. Because the presence or absence of such materials cannot be determined until the site is excavated, periodic monitoring during construction is required to identify any previously unidentified archaeological resources uncovered by Project construction activity. Accordingly, the recommended mitigation measure (MM TCR-1) listed below will be implemented to ensure that if

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[120] *City of Los Angeles Department of City Planning, General Plan Framework Element Final Environmental Impact Report, Section 2.15 Cultural Resources, Figure CR-1 Prehistoric and Historic Archaeological Sites and Survey Areas in the City of Los Angeles, August 2001.*

[121] *South Central Coastal Information Center, Record Search Results for the 655 Mesquit Street Project [ENV-2020-6829-EAF], February 8, 2021.*

any archaeological resources or tribal cultural resources are encountered during construction, impacts to such resources would be reduced to a less than significant level.

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

Potentially Significant Impact Unless Mitigation Incorporated. 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, pre-consultation request letters were sent on April 15, 2021 to eleven 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. The City did not receive any responses. Based on the Project Site's prior soil disturbance, prior development, and lack of any known Native American resources or cultural or sacred sites, the probability for the discovery of a known site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe is considered low. Based on the history of the Project Site's recent excavation associated with the 640 S. Santa Fe Avenue Project that did not yield any discovery of tribal cultural resources, the lead agency has determined that there is no substantial evidence indicating that the Project would result in any adverse impacts to tribal cultural resources. After acting in good faith and after reasonable effort, the City has concluded the AB 52 consultation process.

As noted above and in Section II, Project Description, the Project would include excavation and grading to a depth of approximately 32 feet below ground surface to ensure the proper base and slope for the two levels of subterranean parking and the proposed building foundation. Because the presence or absence of tribal cultural materials cannot be determined until the site is excavated, periodic monitoring during construction is required to identify any previously unidentified archaeological resources uncovered by Project construction activity. With the implementation of the mitigation measures (TCR-1) below, the Project's potential impacts to tribal cultural resources would be less than significant.

Mitigation Measures

TCR-1 (Tribal Cultural Resources)

Prior to commencing any ground disturbance activities at the Project site, the Applicant, or its successor, shall retain archeological monitors and tribal monitors that are qualified to identify subsurface tribal cultural resources. Ground disturbance activities shall include excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil or a similar activity at the project site. Any qualified tribal monitor(s) shall be approved by a tribal representative of a traditionally and culturally affiliated California Native American

tribe that is geographically associated with the project locale; however, after good faith effort to retain a tribal monitor, if the Tribe is unable to provide an on-site monitor at the time of any demolition, grading or excavation activities, the Applicant may proceed with construction). Any qualified archaeological monitor(s) shall be approved by the Department of City Planning, Office of Historic Resources ("OHR").

The qualified archeological and tribal monitors shall observe all ground disturbance activities on the project site at all times the ground disturbance activities are taking place. If ground disturbance activities are simultaneously occurring at multiple locations on the project site, an archeological and tribal monitor shall be assigned to each location where the ground disturbance activities are occurring. The on-site monitoring shall end when the ground disturbing activities are completed, or when the archaeological and tribal monitor both indicate that the site has a low potential for impacting tribal cultural resources.

Prior to commencing any ground disturbance activities, the archaeological monitor in consultation with the tribal monitor, shall provide Worker Environmental Awareness Program (WEAP) training to construction crews involved in ground disturbance activities that provides information on regulatory requirements for the protection of tribal cultural resources. As part of the WEAP training, construction crews shall be briefed on proper procedures to follow should a crew member discover tribal cultural resources during ground disturbance activities. In addition, workers will be shown examples of the types of resources that would require notification of the archaeological monitor and tribal monitor. The Applicant shall maintain on the Project site, for City inspection, documentation establishing the training was completed for all members of the construction crew involved in ground disturbance activities.

In the event that any subsurface objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities, all such activities shall temporarily cease within the area of discovery, the radius of which shall be determined by a qualified archeologist, in consultation with a qualified tribal monitor, until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:

1. Upon a discovery of a potential tribal cultural resource, the Applicant, or its successor, shall immediately stop all ground disturbance activities in the vicinity of the find and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project; (2) and OHR.

2. If OHR determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be a tribal cultural resource in its discretion and supported by substantial evidence, the City shall provide any affected tribe a reasonable period of time, not less than 14 days, to conduct a site visit and make recommendations to the Applicant, or its successor, and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.

3. The Applicant, or its successor, shall implement the tribe's recommendations if a qualified archaeologist retained by the City and paid for by the Applicant, or its successor, in consultation with the tribal monitor, reasonably conclude that the tribe's recommendations are reasonable and feasible.

4. In addition to any recommendations from the tribal representative, a qualified archeologist shall develop a list of actions that shall be taken to avoid or minimize impacts to the identified tribal cultural resources substantially consistent with best practices identified by the Native American Heritage Commission and in compliance with any applicable federal, state or local law, rule or regulation.

5. If the Applicant, or its successor, does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist or qualified tribal monitor, the Applicant, or its successor, may request mediation by a mediator agreed to by the Applicant, or its successor, and the City. The mediator must have the requisite professional qualifications and experience to mediate such a dispute. The City shall make the determination as to whether the mediator is at least minimally qualified to mediate the dispute. After making a reasonable effort to mediate this particular dispute, the City may (1) require the recommendation be implemented as originally proposed by the archaeologist or tribal monitor; (2) require the recommendation, as modified by the City, be implemented as it is at least as equally effective to mitigate a potentially significant impact; (3) require a substitute recommendation be implemented that is at least as equally effective to mitigate a potentially significant impact to a tribal cultural resource; or (4) not require the recommendation be implemented because it is not necessary to mitigate any significant impacts to tribal cultural resources. The Applicant, or its successor, shall pay all costs and fees associated with the mediation.

6. The Applicant, or its successor, may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by both the qualified archaeologist and qualified tribal monitor and determined to be reasonable and appropriate.

7. The Applicant, or its successor, may recommence ground disturbance activities inside of the specified radius of the discovery site only after it has complied with all of the recommendations developed and approved pursuant to the process set forth in paragraphs 2 through 4 above.

8. Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton and to the Native American Heritage Commission for inclusion in its Sacred Lands File.

9. Notwithstanding paragraph 8 above, any information that the Department of City Planning, in consultation with the City Attorney's Office, determines to be confidential in nature shall be excluded from submission to the SCCIC or provided to the public

under the applicable provisions of the California Public Records Act, California Public Resources Code, section 6254(r), and handled in compliance with the City's AB 52 Confidentiality Protocols.

Cumulative Impacts

Less Than Significant. As indicated above, the Project Site does not contain any known tribal cultural resources, nor did search results by the Assembly Bill 52 consultation process provide substantial evidence as to the presence of tribal cultural resources on site. Additionally, compliance with standard conditions of approval and regulatory requirements would ensure potential impacts from inadvertent discovery would be reduced to a less-than-significant level. It is unknown whether or not any of the properties on which the related projects are located contain tribal cultural resources. However, similar to the Project, each of the related projects would be required to follow the regulatory requirements of Assembly Bill 52, as applicable, which includes notifying tribes to solicit consultation and to analyze and mitigate potential impact of tribal cultural resources. Any related project sites that contain tribal cultural resources would be required to comply with conditions of approval to avoid or substantially lessen potential impacts. Therefore, cumulative impacts would be less that significant.

Mitigation Measures

Cumulative impacts with regard to tribal cultural resources would be less than significant. Therefore, no mitigation measures are required.

XIX. Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c. 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?	☐	☐	☒	☐
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Regulatory Setting

Water

The Los Angeles Department of Water and Power (LADWP) supplies the City of Los Angeles with water and is responsible for ensuring that water demands within the City are met. LADWP's 2015 Urban Water Management Plan identifies water efficient strategies to promote the efficient use and management of its water resources. The Chapter XIII of the LAMC and Chapter IX, Article 9 of the LA Green Building Code also establishes water requirements for the City's residential and non-residential development. The City has also enacted Ordinance No. 170,978 and Ordinance No. 181,288 (Emergency Conservation Plan) to impose water conservation measures to landscaping and to ration water during drought conditions, respectively.

Wastewater

The Los Angeles Department of Public Works, Bureau of Sanitation Division (LASAN) provides sewer conveyance infrastructure and wastewater treatment services to the City of Los Angeles. The Los Angeles General Plan Framework Element, Chapter 9, Infrastructure and Public Services, identifies goals, objectives, and policies for utilities within the City, including a goal to provide adequate wastewater collection and treatment capacity to City-owned wastewater treatment facilities. The Los Angeles Integrated Resources Plan (IRP), which addressed interrelated management between LASAN and LADWP regarding wastewater, stormwater, and recycled water. The IRP projects future wastewater generation based on population projections from SCAG and how population increases will affect the capacity of sewer systems like the Hyperion Water Reclamation Plant. City-prepared One Water LA 2040 provides an integrated approach to Citywide recycled water supply and builds on the IRP to ensure greater resiliency to drought conditions and climate change. In addition, the LA Green New Deal 2019 includes a multi-

faceted approach to developing locally sustainable water supplies and reduce reliance on imported water, and it establishes a target of recycling 100% of all wastewater by 2035. The LAMC Sections 64.11 and 64.12 also establish requirements regarding wastewater sewer system services, including the completion of a Sewer Capacity Availability Review (SCAR) to assess the existing sewer capacity of a project site and determine adequate capacity of the existing sewer system for a project.

Solid Waste

At the State level, solid waste is regulated by Assembly Bill 939 (AB 939) which requires all cities, counties, and regional solid waste management agencies to reduce their waste disposal by certain amounts and specifically requires cities and counties to develop Source Reduction and Recycling Elements (SRRE) detailing how diversion goals would be met. At the regional level, the Los Angeles County Integrated Waste Management Plan is comprised of the County's describes the steps to be taken by local agencies, acting independently and in concert, to achieve the state mandated diversion rate by integrating strategies aimed toward reducing, reusing, recycling, diverting, and marketing solid waste generated within the County. At a local level, under the City's Solid Waste Integrated Resources Plan (SWIRP), the City committed to reaching Zero Waste by diverting 70% of the solid waste generated in the City by 2013, diverting 90% by 2025, and becoming a zero waste city by 2030.[122]

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact. A significant impact may occur if a project would increase demands upon infrastructure to such a degree that the construction or relocation of facilities currently serving the Project Site would result in significant environmental impacts. The determination of whether a project results in a significant impact on water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities shall be made considering the following factors: (a) the total estimated demand for the project; (b) whether sufficient capacity exists in the infrastructure that would serve the project, taking into account the anticipated conditions at project buildout; and (c) whether improvements or upgrades necessary to serve the project would result in significant environmental impacts.

Water Treatment Facilities and Existing Infrastructure

The Los Angeles Department of Water and Power ("LADWP") ensures the reliability and quality of water supply through an extensive distribution system that includes more than 7,200 miles of pipes, more than 100 storage tanks and reservoirs within the City, and eight storage reservoirs along the Los Angeles Aqueducts. Much of the water flows north to south, entering Los Angeles at the Los Angeles Aqueduct Filtration Plant ("LAAFP") in Sylmar, which is owned and operated

[122] *City of Los Angeles, Department of Public Works, Bureau of Sanitation, Zero Waste Progress Report, March, 2013.*

by LADWP. Water entering the LAAFP undergoes treatment and disinfection before being distributed throughout the LADWP's Water Service Area. The LAAFP has the capacity to treat approximately 600 million gallons per day (mgd).[123] In 2017, the LADWP's water system supplied 4 million customers with nearly 160 billion gallons of treated water, resulting in an average daily water demand of approximately 438 mgd. Therefore, the LAAFP has a remaining capacity of treating approximately 162 mgd, which may fluctuate depending on the season.[124]

Based on correspondence from the LADWP, the Project Site is currently served by an 8-inch water main along S. Santa Fe Avenue, a 6-inch water main along Jesse Street, and a 6-inch main along Mesquit Street.[125] There are no known water deficiencies in the area.[126]

The Project would result in the construction of a 14-story commercial building with approximately 188,954 square feet of floor area comprised of 184,629 square feet of office uses and approximately 4,325 square feet of ground floor commercial uses. As shown in Table 4.33, the Project would generate a net increase in water demand of approximately 42,200 gallons per day (gpd) of water (or approximately 47.3 acre feet per year [AFY]) and a total Project Site water demand of 67,935 gpd (or approximately 76.2 AFY), which is significantly below available capacity.

Further, because the Project's employment growth is within SCAG's forecast, the Project's increased water demand would not measurably reduce the LAAFP's capacity. Therefore, no new or expanded water treatment facilities would be required. With respect to water treatment facilities, the Project would have a less-than-significant impact.

Although no further upgrades are anticipated at this time, in the event that water main and/or other infrastructure upgrades are required for the Project, such infrastructure improvements would be conducted within the right-of-way easements serving the Project Site area, and would not create a significant impact to the physical environment. This is largely due to the fact that (a) any disruption of service would be of a short-term nature, (b) the replacement of the water mains would be within public rights-of-way, and (c) any foreseeable infrastructure improvements would be limited to the immediate project vicinity. Such construction activities would be localized in nature and would generally involve partial lane closures for a relatively short duration of time typically lasting a few days to a few weeks. Therefore, potential impacts resulting from water infrastructure improvements for the Project would be less than significant.

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[123] *U.S. Department of Energy, website: https://betterbuildingssolutioncenter.energy.gov/showcase-projects/los-angeles-aqueduct-filtration-plant-modernization—-oxygen-plant-replacement, accessed August 2020.*

[124] *Los Angeles Department of Water and Power, Water, L.A.'s Drinking Water Quality Report, website: http://www.ladwp.com/, accessed August 2020.*

[125] *City of Los Angeles Department of Water and Power, Water and Electricity Connection Services Request, 655 Mesquit Street, December 23, 2020 (see Appendix J to this IS/MND).*

[126] *Ibid.*

Table 4.33
Project Estimated Water Demand

Type of Use	Size	Water Demand Rate (gpd/unit) [a]	Total Water Demand (gpd)
Existing Conditions			
640 S. Santa Fe Avenue			
Office	91,235 sf	204 gpd / ksf	18,612
Retail	9,435 sf	30 gpd / ksf	283
Commercial (Restaurant)	6,554 sf (190 seats)	36 gpd / seat	6,840
		Total Existing Water Demand:	**25,735**
Project			
655 Mesquit Street			
Office	184,629 sf	204 gpd / ksf	37,664
Commercial (Retail/Restaurant) [b]	4,325 sf (126 seats)	36 gpd / seat	4,536
		Total Project Water Demand:	**42,200**
		Project Plus Existing Water Demand:	*25,735*
		Total Project Site Water Demand:	**67,935 gpd (76.2 AFY)**

Notes: sf =square feet; ksf = 1,000 sf; gpd = gallons per day; AFY = acre feet per year

[a] *Water demand is based on 120% of the estimated wastewater generation based on the Bureau of Sanitation, Wastewater Engineering Services Division, 655 Mesquit Street Project - Request for Wastewater Service Information, November 25, 2020 (see Appendix J to this IS/MND).*

[b] *As restaurant uses generate more wastewater than retail uses, it is assumed all commercial uses are restaurant uses to provide a conservative estimate. Seating capacity for the restaurant use was based on 126 seats as estimated by LASAN (See Appendix J).*

Source: Parker Environmental Consultants, 2021.

Wastewater Treatment Facilities and Existing Infrastructure

A project would normally have a significant wastewater impact if: (a) the project would cause a measurable increase in wastewater flows to a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or (b) the project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General plan and its elements.

The Los Angeles Bureau of Sanitation ("BOS") provides sewer service to the Project Site area. Sewage from the Project Site is conveyed via sewer infrastructure to the Hyperion Water Reclamation Plant ("HWRP"). The Hyperion Water Reclamation Plant treats an average daily flow of 275 million gallons per day ("mgd") on a dry weather day. Because the amount of wastewater entering the HWRP can double on rainy days, the plant was designed to accommodate both dry and wet weather days with a maximum daily flow of 450 mgd and a peak wet weather flow of 800

mgd.[127] This equals a remaining capacity of 175 mgd of wastewater able to be treated at the HWRP.

The Project would result in the new construction of a 14-story commercial building with approximately 188,954 square feet of floor area comprised of 184,629 square feet of office uses and approximately 4,325 square feet of ground floor commercial uses. As shown in Table 4.34, below, the Project would generate a net increase in wastewater generation of approximately 35,167 gallons per day (gpd) of wastewater and a Project Site total wastewater generation of 56,613 gpd which is significantly below available capacity.

Table 4.34
Project Estimated Wastewater Generation

Type of Use	Size	Wastewater Generation Rate (gpd/unit) [a]	Total Wastewater Generation (gpd)
Existing Conditions			
640 S. Santa Fe Avenue			
Office	91,235 sf	170 gpd / ksf	15,510
Retail	9,435 sf	25 gpd / ksf	236
Commercial (Restaurant)	6,554 sf (190 seats)	30 gpd / seat	5,700
Total Existing Wastewater Generation:			**21,446**
Project			
655 Mesquit Street			
Office	184,629 sf	170 gpd / ksf	31,387
Commercial (Retail/Restaurant) [b]	4,325 sf (126 seats)	30 gpd / seat	3,780
Total Project Wastewater Generation:			**35,167**
Project Plus Existing Wastewater Generation:			*21,466*
Total Project Wastewater Generation:			**56,613**

Notes: sf =square feet; ksf = 1,000 sf; gpd = gallons per day; AFY = acre feet per year

[a] *Wastewater generation rate based on the Bureau of Sanitation, Wastewater Engineering Services Division, 655 Mesquit Street Project - Request for Wastewater Service Information, November 25, 2020 (see Appendix J). It is assumed all water turns into wastewater.*

[b] *As restaurant uses generate more wastewater than retail uses, it is assumed all commercial uses are restaurant uses to provide a conservative estimate. Seating capacity for the restaurant use was based on 126 seats as estimated by LASAN (See Appendix J).*

Source: Parker Environmental Consultants, 2021.

Based on correspondence from the City of Los Angeles Bureau of Sanitation ("BOS"), Wastewater Engineering Services Division, the Project Site is currently served by an 8-inch line on Mesquit Street that feeds into a 38-inch line on Wilson Street before discharging into a 40-inch sewer line on 8th Street. Based on this Request for Wastewater Services Information Letter, BOS has determined that the sewer lines serving the Project Site are likely adequate for the construction

[127] *City of Los Angeles Department of Public Works, Bureau of Sanitation, Hyperion Water Reclamation Plant, website: https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=t4yrq0jkq_4&_afrLoop=10780400868530458#!, accessed August 2020.*

and maintenance of the Project.[128] Through the rules and regulations established in the City of Los Angeles Sewer Allocation Ordinance (Ord. 166,060), the BOS will re-verify the gauging of the sewer lines and make the appropriate decisions on how best to connect to the local sewer lines at the time of construction. If it is later determined that the local sewer system has insufficient capacity to serve the Project, the Applicant would be required to replace or build new sewer lines to a point in the sewer system with sufficient capacity to accommodate the Project's increased flows. Any infrastructure improvements to update or expand the sewer lines in the Project vicinity, if necessary, would be limited to trenching, excavating and backfilling the sewer lines beneath the public right-of-way. Such construction activities would be localized in nature and would generally involve partial lane closures for a relatively short duration of time, typically lasting a few days to a few weeks. Impacts to sewer capacity and infrastructure would be less than significant. Therefore, impacts to sewer capacity and infrastructure would be less than significant.

Stormwater Drainage Facilities

As described in Section X(a), Hydrology and Water Quality, the Project would not result in a significant increase in site runoff, or any changes in the local drainage patterns. The Project would be required to demonstrate compliance with Low Impact Development ("LID") standards and retain or treat the first ¾-inch of rainfall in a 24-hour period, or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater. The western half of the Project is currently improved with the 640 S. Santa Fe Avenue building, a four-story mixed-use office and ground floor commercial building with two subterranean parking levels. The Development Site, located on the eastern half of the Project Site, is currently improved as a surface parking lot for the 640 S. Santa Fe Avenue building. The Project would redevelop the surface parking lot into a 14-story office and ground floor commercial building with two subterranean parking levels and five parking levels above grade. Runoff from the Project Site is, and would continue to be, directed toward existing storm drains in the Project vicinity. As also stated and previously discussed in Section X(a), Hydrology and Water Quality, the Project shall comply with National Pollutant Discharge Elimination System ("NPDES") requirements and the Low Impact Development regulations and implement Best Management Practices ("BMPs") during the construction and operation of the Project.

The appropriate design and application of BMPs devices and facilities shall be determined by the Watershed Protection Division of the Bureau of Sanitation, Department of Public Works. Thus, development of the Project would not create or contribute to runoff water, which may exceed the capacity of existing or planned stormwater drainage systems. Therefore, Project impacts to stormwater drainage facilities would be considered less than significant.

Electricity

The projected increase in electrical demand due to the Project would not have an adverse impact on its electrical system. Depending on the exact location and size of the requested services (to be determined as site plans are finalized), the Project Applicant may be financially responsible for

[128] *City of Los Angeles Bureau of Sanitation, Wastewater Engineering Services Division, 655 Mesquit Street Project – Request for Wastewater Service Information, November 25, 2020 (see Appendix J to this IS/MND).*

some infrastructure improvements necessary to serve the Project (e.g. installation of electric power facilities or service connections or adding a line extension on the public street). New service connections may occasionally result in temporary disruptions in electrical services for existing customers. However, no outages or short outage is anticipated to occur when hooking up the Project.

The Project Site is located in a highly urbanized area in the Central City North Community. Based on correspondence with LADWP, dated December 23, 2020 (see Appendix J of this IS/MND), two overhead 34.5kV circuits run along Mesquit Street, one overhead circuit runs along Jesse Street, and two overhead 4.8kV circuits run along Mesquit Street and S. Santa Fe Avenue. The LADWP has confirmed that there are no existing electricity service problems or deficiencies in the Project area. However, cumulative effects of the Project and other new and added loads in the area may require near term and/or future additions to distribution system capacity. The Project would require an on-site transformer facility and may require underground line extension on public streets. In the event that infrastructure upgrades are required for the proposed development, such infrastructure improvements would be conducted within the right-of-way easements serving the Project Site area and would not create a significant impact to the physical environment. This is largely because (a) any disruption of service would be short-term, (b) upgrades would be conducted within public rights-of-way, and (c) any foreseeable infrastructure improvements would be limited to the immediate Project Site vicinity.

The Project's estimated net additional electricity consumption would be approximately 3,111,922 kWh per year.[129] The LADWP has confirmed that the estimated power requirement for the Project is within the total load growth forecast for the City of Los Angeles and has been taken into account in the planned growth of the City's power system. In planning sufficient future resources, the LADWP's Power Strategic Long-Term Resource Plan ("SLTRP") incorporates the estimated power requirement for the Project through the load forecast input and has planned sufficient resources to supply the electricity needs. Electricity supplies from LADWP are adequate to serve the Project, and any improvements to existing infrastructure would not be expected to result in any significant secondary environmental effects. Therefore, the Project impacts to local and regional electricity supplies and existing electrical facilities would be less than significant.

Natural Gas

SoCal Gas provides natural gas resources to the City through existing gas mains located under the streets and public rights-of-way. Natural gas services are provided in accordance with SoCalGas's policies and extension rules on file with CPUC at the time contractual agreements are made. Natural gas is delivered to the Project Site through natural gas facilities underneath the adjacent public streets. Construction of the Project would necessitate closing off existing service connections to the Project Site and re-establishing new service connections to the proposed structure. Such infrastructure improvements would be conducted on-site and within the right-of-way easements serving the Project Site area and would not create a significant impact to the physical environment. This is largely due to the fact that (a) any disruption of service would be short-term, (b) upgrades would be localized to the portion of the Project Site proposed to be

[129] *See Table 4.12, Project Electricity Demand. The Project's electricity usage estimate was based on the Project Annualized GHG emissions provided in Appendix D to this IS/MND.*

developed (the Development Site of the Project on the eastern half), and (c) any foreseeable off-site improvements would be limited to the right-of-way easements in the immediate Project Site vicinity.

As shown in Table 4.13, Estimated Natural Gas Consumption by the Project, above (See Section VI, Energy), the Project's estimated net additional operational natural gas usage is approximately 2,721,965 cubic feet per year. As mentioned in response to Checklist Question VI, Energy, the SoCalGas allocated approximately 112.5 billion cubic feet to residential, small industrial, and commercial customers, and it is anticipated that it would be able to meet the needs of future development within the region. Therefore, potential impacts resulting from natural gas infrastructure improvements would be less than significant.

The natural gas consumption of 2.7 million cubic feet per year would represent a very small fraction of one percent of the SoCalGas's existing natural gas storage capacity and therefore, would be well within the SoCal Gas' existing natural gas storage capacity of 112.5 billion cubic feet as of 2018. The operation of the Project would not result in the increase in demand for natural gas that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities. Therefore, the Project would result in a less than significant impact to natural gas infrastructure capacity.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less Than Significant Impact. A significant impact may occur if a project would increase water consumption to a degree such that new water sources would need to be identified. The determination of whether the Project results in a significant impact on water shall be made considering the following factors: (a) the total estimated water demand for the project; (b) whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project buildout; (c) the amount by which the project would cause the projected growth in population, housing, or employment for the Community Plan area to be exceeded in the year of the project completion; and (d) the degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.

As previously mentioned, the City's water supply comes from local groundwater sources, the Los Angeles-Owens River Aqueduct, State Water Project, and from the Metropolitan Water District ("MWD") of Southern California, which is obtained from the Colorado River Aqueduct. The MWD utilizes a land-use based planning tool that allocates projected demographic data from the SCAG into water service areas for each of MWD's member agencies. The 2015 Urban Water Management Plan ("UWMP"), which estimates future demand based on population and growth reported in SCAG's RTP/SCS, projects a total water demand and supply of 675,685 AFY in 2040. With its current water supplies, planned future water conservation, and planned future water supplies, LADWP will be able to reliably provide water to its customers through the 25-year planning period covered by the 2015 UWMP. Through various conservation strategies, the LADWP will be able to reduce the City's water demand during dry years to respond to any reductions to water supplies during multiple dry years.

As shown in Table 4.33, the Project's net increase for water demand would be 67,935 gallons per day. The Project, which would add approximately 756 new employees and would contain 188,954

square feet of new floor area, is below the threshold required by State law for preparation of a Water Supply Assessment. The Project's employment growth of 756 new jobs is consistent with the employment growth of 472,700 new jobs in the City of Los Angeles subregion and the 2,432,000 new jobs forecasted within the SCAG region between 2012 and 2040, respectively. Accordingly, the Project's anticipated water demand has been accounted for and would not exceed the water demand estimates of the City's 2015 UWMP. Thus, the Project would have a less-than-significant impact on water demand.

In addition, high efficiency water closets, high efficiency urinals, and low flow faucets must be installed in new construction. The flow rates of new plumbing fixtures must comply with the most stringent of the following: Los Angeles City Ordinance No. 184,248, Los Angeles Ordinance No. 184,692, the 2019 Los Angeles Plumbing Code, the 2019 California Green Building Standards Code ("CALGreen") and the 2020 Los Angeles Green Building Code. With respect to landscaping, the Project would be required to comply with Los Angeles City Ordinance No. 170,978 and the City of Los Angeles Irrigation Guidelines, which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and use water less in the cooler months and during the rainy season).

The City of Los Angeles has enacted legislation to address the water supply shortages caused by the recent Statewide drought. Los Angeles City Ordinance No. 181,288 (Emergency Water Conservation Plan) imposes phased water rationing during drought conditions and imposes penalties for users that do not comply. When water rationing is in effect, landscape irrigation is prohibited between the hours of 9:00 AM and 4:00 PM. Specific watering days and maximum irrigation rates are also defined in this ordinance. Compliance with the regulatory compliance measures identified above would ensure the Project's demands for potable water resources to a less than significant level.

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. A significant impact would occur if a project exceeds wastewater treatment requirements of the applicable Regional Water Quality Control Board. Section 13260 of the California Water Code states that persons discharging or proposing to discharge waste that could affect the quality of the waters of the State, other than into a community sewer system, shall file a Report of Waste Discharge ("ROWD") containing information which may be required by the appropriate Regional Water Quality Control Board ("RWQCB"). The RWQCB then authorizes an NPDES permit that ensures compliance with wastewater treatment and discharge requirements. The LARWQCB enforces wastewater treatment and discharge requirements for properties in the Project Site area.

Wastewater from the Project Site is conveyed via municipal sewage infrastructure maintained by the Los Angeles Bureau of Sanitation to the Hyperion Water Reclamation Plant ("HWRP"). The HWRP is a public facility and, therefore, is subject to the State's wastewater treatment requirements. As stated above, the HWRP treats an average daily flow of 275 million gallons per day ("mgd") on a dry weather day and was designed to accommodate both dry and wet weather

days with a maximum daily flow of 450 mgd and a peak wet weather flow of 800 mgd.[130] This equals a remaining capacity of 175 mgd of wastewater able to be treated at the HWRP.

As estimated above (see Table 4.34, Project Estimated Wastewater Generation), the Project would generate approximately 35,167 gpd of wastewater, representing a fraction of one percent of the available capacity. Wastewater from the Project Site is and would continue to be treated according to the wastewater treatment requirements enforced by the LARWQCB. Therefore, a less than significant impact would occur.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than 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 determination of whether a project results in a significant impact on solid waste shall be made considering the following factors: (a) amount of projected waste generation, diversion, and disposal during demolition, construction, and operation of the project, considering proposed design and operational features that could reduce typical waste generation rates; (b) need for additional solid waste collection route, or recycling or disposal facility to adequately handle project-generated waste; and (c) whether the project conflicts with solid waste policies and objectives in the Source Reduction and Recycling Element ("SRRE") or its updates, the Solid Waste Management Policy Plan ("SWMPP"), Framework Element of the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE.

Regulatory Setting

Solid waste generated within the City is disposed of at privately owned landfill facilities throughout Los Angeles County. While the Bureau of Sanitation provides waste collection services to single-family and some small multi-family developments, private haulers provide waste collection services for most multi-family residential and commercial developments within the City. Solid waste transported by both public and private haulers is recycled, reused, transformed at a waste-to-energy facility, or disposed of at a landfill. Under the City's RENEW LA Plan, adopted in February 2006, the City committed to reaching Zero Waste. The goal of Zero Waste, as defined by the RENEW LA Plan, is to reduce, reuse, recycle, or convert the resources currently going to disposal so as to achieve an overall diversion rate of 90 percent or more by the year 2025 and becoming a Zero Waste city by 2030.[131] State law (AB 341) currently requires at least 50% solid waste diversion and establishes a State-wide goal of not less than 75% of solid waste generated be source reduced, recycled, or composted by the year 2020. As of 2012, the City of Los Angeles

[130] *City of Los Angeles Department of Public Works, Bureau of Sanitation, Hyperion Water Reclamation Plant, website: https://www.dropbox.com/s/arifp525e4ypbdf/Hyperion%20Water%20Reclamation%20Plant.pdf?dl=0, accessed August 2020.*

[131] *City of Los Angeles, Bureau of Sanitation, Solid Waste Integrated Resources Plan – A Zero Waste Master Plan, October 2013, Final Adoption, April 2015, website: https://www.lacitysan.org/san/sandocview?docname=cnt012522, accessed August 2020.*

achieved a landfill diversion rate of 76.4%, based upon the calculation methodology adopted by the State of California.[132]

Moreover, AB 341 requires mandatory commercial recycling in all businesses or public entities that subscribe to waste collection services or are multi-family residential properties of five or more units, and State law imposes additional reporting requirements on local agencies, including the City of Los Angeles. In order to meet these requirements and goals, the City has established an exclusive, competitive franchise system for the collection, transportation, and processing of commercial and multi-family solid waste that will aid the City in meeting its diversion goals by, among other things: (i) requiring franchisees to meet diversion targets; (ii) increasing the capacity for partnership between the City and solid waste haulers; (iii) allowing the City to establish consistent methods for diversion of recyclables and organics; (iv) increasing the City's ability to track diversion, which will enable required reporting and monitoring of state mandated commercial and multi-family recycling; (v) increasing the City's ability to ensure diversion quality in the processing facilities handling its waste and recyclables; and (vi) increasing the City's capacity to enforce compliance with federal, State, county, and local standards.[133]

Analyzing solid waste collection and disposal infrastructure capacity, the Project Site is located within the Downtown Commercial Waste Franchise Zone, which is serviced under contract to NASA Services, Inc. (service provider). Under this contract, the service provider is required to deliver all solid waste resources collected to the certified facilities specified in Table 4.35, below.

Table 4.35
Downtown Zone Authorized Solid Waste Disposal/Transfer Facilities

Facility Name	Facility Address	Primary or Secondary
Central LA Recycling & Transfer Station (CLARTS)	2201 E. Washington Blvd. Los Angeles, CA 90034	Primary Transload
Puente Hills Material Recovery Facility	2808 South Workman Mill Rd. Whittier, CA 90601	Secondary

Source: City of Los Angeles Department of Sanitation, recycleLA website, Copy of Exclusive Franchise Contract with NASA, Appendix B: Facility Utilization Plan, Zone: Downtown, pg. 152. Website: https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-zwlaf/s-lsh-wwd-s-zwlaf-au/s-lsh-wwd-s-zwlaf-au-a?_adf.ctrl-state=105jfhii6_147&_afrLoop=19600575710069264#!, accessed August 2021.

Landfill availability is limited by several factors, including: (1) restrictions to accepting waste generated only within a particular landfill's jurisdiction and/or waste shed boundary, (2) tonnage permit limitations, (3) types of waste, and (4) operational constraints. Planning to serve long-term disposal needs is constantly being conducted at the regional level (e.g., siting new landfills within the County and transporting waste outside the region). As noted in Table 4.35, above, landfill waste from areas within the Downtown Commercial Waste Franchise Zone would utilize the Central LA Recycling and Transfer Station ("CLARTS") and Puente Hills Material Recovery Facility as primary/secondary facilities. To provide a conservative analysis, it is assumed that the

[132] *City of Los Angeles, Bureau of Sanitation, Zero Waste Progress Report, March 2013, https://planning.lacity.org/eir/8150Sunset/References/4.K.3.%20Solid%20Waste/SW.04_Zero%20Waste%20Progress%20Report_March%202013.pdf, accessed August 2020.*

[133] *City of Los Angeles Ordinance 184666, approved 12/14/2016, website: http://clkrep.lacity.org/onlinedocs/2016/16-1235_ORD_184666_12-14-16.pdf, accessed August 2020.*

Project's solid waste that is unable to be recycled or diverted would be disposed of at the Sunshine Canyon Landfill.

In September 2020, the Los Angeles Countywide Integrated Waste Management Plan 2019 Annual Report was published. It analyzed the County's disposal capacity needs and strategies for maintaining adequate capacity through a 15-year period. For the Sunshine Canyon Landfill, as of December 31, 2019, it has a remaining capacity of 55.2 million tons (69.7 million cubic yards) and an estimated remaining life of 18 years. Its maximum permitted daily capacity is 12,100 tons (15,316 cubic yards), or annual equivalent of 3,775,200 tons (4,778,734 cubic yards).[134] In 2018, the Sunshine Canyon Landfill had an average disposal intake of 6,387 tons (8,080 cubic yards), based on its operating schedule of 6 days per week (Mondays through Saturdays).[135]

Los Angeles County has separate landfill facilities that accept construction and demolition ("C&D") waste that can be recycled. The closest transfer and recycling facility to the Project Site that is authorized under the Downtown Commercial Waste Franchise Zone services contract is CLARTS, which is located approximately 1.9 miles south of the Project Site.[136] This recycling center has a daily permitted intake of 4,025 tons per day and has a present capacity of 2,500 tons/day.[137] Based on the most current data regarding incoming material by origin, CLARTS accommodated an average of 3,000 tons/day during the 2014-2015 reporting period.[138]

Construction Impacts

The Project's construction impact analysis includes the demolition of the existing surface parking lot on the eastern portion of the Project Site and the new construction of a 14-story commercial building with 188,954 square feet of floor area and two levels of below grade parking. The Project would follow all applicable solid waste policies and objectives that are required by law, statute, or regulation. Under the requirements of the hauler's AB 939 Compliance Permit from the Bureau of Sanitation, all construction and demolition debris would be delivered to a Certified Construction and Demolition Waste Processing Facility. Debris from demolition of any asphalt surface parking located on the Project Site would be recycled/recovered and would not be deposited in area landfills. Based on the calculations provided below in Table 4.36, it is estimated that the proposed construction activities would generate approximately 982 tons of debris during the demolition and

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134 *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan, 2019 Annual Report, September 2020, website: https://pw.lacounty.gov/epd/swims/ShowDoc.aspx?id=14372&hp=yes&type=PDF, accessed February 2021.*

135 *Ibid.*

136 *Los Angeles County, Department of Public Works, Construction and Demolition Debris Recycling Facilities in Los Angeles County, updated February 2020, website: https://ladpw.org/epd/CD/cd_attachments/Recycling_Facilities.pdf, accessed August 2020.*

137 *City of Los Angeles, LASAN, CLARTS Facts and Services Fact Sheet, website: https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-cl/s-lsh-wwd-s-cl-fs?_adf.ctrl-state=18bskyzkh_309&_afrLoop=6955658940440808&_afrWindowMode=0&_afrWindowId=null#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D6955658940440808%26_afrWindowMode%3D0%26_adf.ctrl-state%3D18bskyzkh_313, accessed August 2020.*

138 *Ibid.*

Table 4.36
Project Construction and Demolition Debris

Construction Activity	Size	Rate	Generated Waste (tons)
Demolition			
Surface Asphalt	513 cy [a]	2,400 lbs / cy [b]	615
Construction			
Commercial	184,629 sf	3.89 lbs / sf [c]	359
Restaurant	4,325 sf	3.89 lbs / sf	8
		Total Debris:	**982 tons**

Notes: sf= square feet; lbs = pounds; cy = cubic yards

[a] *Based on the Project's building's lot area of approximately 27,667 square feet, which includes the Development Site on the eastern half of the Project Site.*

[b] *Based on CalRecycle's Solid Waste Cleanup Program Weights and Volumes for Project Estimates, June 12, 2019, website: https://www.calrecycle.ca.gov/swfacilities/cdi/tools/calculations, accessed August 2021.*

[c] *Based on USEPA Report No EPA530-98-010, Characterization of Building Related Construction and Demolition Debris in the United States, Chapter 2, Table 4: Estimated Generation of Non-Residential Construction Debris, June 1998.*

Source: Parker Environmental Consultants, 2021.

construction process that would be exported to a landfill located within the City. In order to meet the diversion goals of the California Integrated Waste Management Act and the City of Los Angeles, the Applicant's contractor would be required to obtain an AB 939 Compliance Permit from the Bureau of Sanitation certifying the delivery of the construction and demolition waste to a certified construction and demolition waste processing facility.

Operational Impacts

The Project operational impact analysis is based on the operation and maintenance of a 188,954 square foot commercial building with 184,629 square feet of office uses and 4,325 square feet of retail/restaurant uses ("Project"). As shown in Table 4.37, below, Project Operational Solid Waste Generation, the Project's net increase in solid waste generation during operation of the Project would be approximately 7,961 pounds per day (or 3.98 tons per day). However, this estimate is conservative, as it does not factor in any recycling or waste diversion programs. The Project's solid waste would be handled by private waste collection services. Therefore, the amount of solid waste generated by the Project is within the available capacities at area landfills and Project impacts to regional landfill capacity would be less than significant. In compliance with AB 341, recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the Project's regular solid waste disposal program. The Project Applicant shall only contract for waste disposal services with a company that recycles solid waste in compliance with AB 341. Therefore, compliance with all applicable solid waste policies and objectives that are required by law, statute, or regulation would ensure that the Project's impacts to operational solid waste generation are less than significant.

Table 4.37
Project Operational Solid Waste Generation

Type of Use	Quantity [a]	Solid Waste Generation Rate [b] (lbs/unit/day)	Total Solid Waste Generated (lbs/day) [c]
Project			
14-Story Office and Ground Floor Commercial Building (188,954 sf)	756 emp	10.53 lbs/emp/day	7,961
Total Project Solid Waste Generation:			**7,961 (3.98 tpd)**

Notes: sf = square feet; lbs = pounds; emp = employees; tpd = tons per day

[a] *Quantity of employees is taken from Table 4.27, Projected Employment Growth, in Section XIV, Population and Housing.*

[b] *The solid waste generation rates, provided in the LA CEQA Thresholds Guide on page M.3-2, are based on employees for commercial land uses.*

[c] *Based on LA CEQA Thresholds Guide, page M.3-2. Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.*

Source: Parker Environmental Consultants, 2021.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): (1) source reduction; (2) recycling and composting; and (3) environmentally safe transformation and land disposal. In addition, AB 1327 provided for the development of the California Solid Waste Reuse and Recycling Access Act of 1991, which requires the adoption of an ordinance by any local agency governing the provision of adequate areas for the collection and loading of recyclable materials in development projects.

In 2002, Senate Bill (SB) 1374 was signed into law to assist jurisdictions with diverting their construction and demolition ("C&D") waste material. SB 1374 requires that the Countywide Integrated Waste Management Board ("CIWMB") (now CalRecycle) complete five items in regards to the diversion of construction and demolition waste: (1) adopt a model ordinance for diverting 50 percent to 75 percent of all C&D debris from landfills; (2) consult with multiple regulators and waste entities (e.g., California State Association of Counties, private and public waste services, building construction materials industry, etc.) during the development of the model ordinance; (3) compile a report on programs that can be implemented to increase diversion of C&D debris; (4) post a report on the agency's website for general contractors on methods that contractors can use to increase diversion of C&D waste materials; (5) post on the agency's website a report for local governments with suggestions on programs to increase diversion of C&D waste materials. Under SB 1374, jurisdictions must also include in their annual AB 939 report a summary of the progress made in diverting construction and demolition waste. The model ordinance was adopted by CalRecycle on March 16, 2004.[139]

[139] *CalRecycle, Senate Bill 1374 (2002), August 24, 2018 Board Meeting, Agenda Item No. 13, website: https://www2.calrecycle.ca.gov/Docs/CIWMBMeeting/Agenda/821, accessed November 2020.*

Furthermore, Assembly Bill 341 ("AB 341"), which became effective on July 1, 2012, requires businesses and public entities that generate four cubic yards or more of waste per week and multi-family dwellings with five or more units, to recycle. The purpose of AB 341 is to reduce greenhouse gas emissions by diverting commercial solid waste from landfills and expand opportunities for recycling in California. In addition, in March 2006, the Los Angeles City Council adopted RENEW LA, a 20-year plan with the primary goal of shifting from waste disposal to resource recovery within the City, resulting in "zero waste" by 2030. The "blueprint" of the plan builds on the key elements of existing reduction and recycling programs and infrastructure and combines them with new systems and conversion technologies to achieve resource recovery (without combustion) in the form of traditional recyclables, soil amendments, renewable fuels, chemicals, and energy. The plan also calls for reductions in the quantity and environmental impacts of residue material disposed in landfills.

More recently, in October 2014, Governor Jerry Brown signed AB 1826, requiring businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste generated per week. Specifically, beginning April 1, 2016, businesses that generate eight cubic yards of organic waste per week shall arrange for organic waste recycling services. In addition, beginning January 1, 2017, businesses that generate four cubic yards of organic waste per week shall arrange for organic waste recycling services. Mandatory recycling of organic waste is the next step toward achieving California's recycling and greenhouse gas emission goals. Organic waste such as green materials and food materials are recyclable through composting and mulching, and through anaerobic digestion, which can produce renewable energy and fuel. Reducing the amount of organic materials sent to landfills and increasing the production of compost and mulch are part of the AB 32 (California Global Warming Solutions Act of 2006) Scoping Plan.

Regional solid waste management is governed by the Los Angeles County Integrated Waste Management Plan. AB 939 mandates jurisdictions to meet a diversion goal of 50 percent by the year 2000, and thereafter. In addition, each county is also required to prepare and administer a Countywide Integrated Waste Management Plan. This plan is comprised of the County's and the cities' solid waste reduction planning documents, an Integrated Waste Management Summary Plan ("Summary Plan"), and a Countywide Siting Element ("CSE"). In order to assess compliance with AB 939, the Disposal Reporting System ("DRS") was established to measure the amount of disposal from each jurisdiction. Comparing current disposal rates to base-year solid waste generation determines whether each jurisdiction complies with the diversion mandate. The most recent annual report, the 2019 Annual Report, was released in September 2020. The purpose of the Annual Report is to provide an annual update to the Summary Plan and CSE. The Los Angeles County Department of Public Works prepares the Annual Report to summarize the changes in solid waste management that have taken place since the approval of the Summary Plan and the CSE, including updated strategies to meet the long-term needs and maintain adequate disposal

capacity. The CIWMP 2019 Annual Report provides disposal analysis and facility capacities for 2019, as well as projections to the CIWMP's horizon year of 2034.[140]

Local solid waste management is governed by the Los Angeles Solid Waste Integrated Resources Plan, LA's Green New Deal Sustainable City pLAn 2019, the Los Angeles General Plan Framework Element's Infrastructure and Public Services Chapter, and the LAMC. Under the City's Solid Waste Integrated Resources Plan, the City committed to reaching Zero Waste by diverting 70% of the solid waste generated in the City by 2013, diverting 90% by 2025, and becoming a zero-waste city by 2030.[141] Mentioned previously in response to question XIX(d) of this section, because state law requires mandatory commercial recycling in all businesses and multi-family complexes, as well as additional reporting requirements on local agencies which include the City of Los Angeles, the City has established an exclusive competitive franchise system for the collection, transportation and processing of commercial and multi-family solid waste that would aid the City in meeting its diversion goals.

As reported by the Bureau of Sanitation, the City's solid waste diversion rate for the 2013 fiscal year was 76.4 percent. Therefore, the City is exceeding the State-mandated diversion goal of 50% by 2000 set by the California Integrated Waste Management Act (AB 939) of 1989.[142] The City's Sustainable City pLAn recently updated in 2019 (and retitled the LA Green Deal) calls for achieving 90 percent diversion by 2025 and 95 percent diversion by 2035 through on-going development of waste management infrastructure and innovative source reduction, reuse, recycling and composting programs. These programs include Green Mulching and Composting workshops, green waste recycling cans, the City-owned CLARTS and Residential Special Material and Electronics Recycling or S.A.F.E. Centers. New programs are being implemented to increase the amount of waste diverted by the City, including multi-family recycling, food waste recycling, commercial recycling and technical assistance, and support for City departments to help meet their waste reduction and recycling goals.

LA's Green New Deal / Sustainable City pLAn 2019 establishes short-term and long-term sustainability targets for the City over the next 20 years in 14 categories to strengthen and promote sustainability of the environment, economy, and equity in Los Angeles. Targets pertaining to solid waste include an increase in landfill diversion rate to 90% by 2025, 95% by 2035, and 100% by 2050; a reduction in municipal solid waste generation per capita by at least 15% by 2030, including phasing out single-use plastics by 2028; an elimination of organic waste going to landfills by 2028; and an increase in the proportion of waste products and recyclables productively reused and/or repurposed within LA County to at least 25% by 2025 and at least 50% by 2035.

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[140] *County of Los Angeles Department of Public Works, The Countywide Integrated Waste Management Plan 2019 Annual Report, September 2020, website: https://pw.lacounty.gov/epd/swims/ShowDoc.aspx?id=14372&hp=yes&type=PDF, accessed February 2021.*

[141] *City of Los Angeles, Department of Public Works, Bureau of Sanitation, Zero Waste Progress Report, March, 2013, website: https://planning.lacity.org/eir/8150Sunset/References/4.K.3.%20Solid%20Waste/SW.04_Zero%20Waste%20Progress%20Report_March%202013.pdf, accessed August 2020.*

[142] *Ibid.*

LA's General Plan Framework Element's Chapter on Infrastructure and Public Services discusses goals, objectives, and policies to support integrated solid waste management efforts that maximize waste reduction, minimize adverse environmental impacts for solid waste that cannot be reduced, recycled, or composted, and create economically cost-effective management systems to adequately finance operational and maintenance needs, among other things.

Within the LAMC, guidance on solid waste management and reduction was addressed with Ordinance No. 184,692 in 2016, which modified Article 9 within the LAMC to reflect the integration of the 2019 CALGreen Code. One of the specifics covered was that Projects filed on or after January 1, 2020 must comply with the provisions of the City's Green Building Code. LAMC Section 66.32.1 requires all persons who collect, remove, or transport solid waste, including C&D waste, source-separated materials or co-mingled recyclables generated within the City, to obtain an AB 939 Compliance Permit from the Bureau of Sanitation. It requires that C&D waste collected within the City be transported to a Certified Construction and Demolition Waste Processing Facility or to another facility if at least two Certified Construction and Demolition Waste Processing Facilities refuse to accept the waste. Solid waste guidance was also addressed with LAMC Section 12.21 A.19, Areas for Collecting and Loading Recyclable Materials, which states that all new development projects shall provide adequate areas for collecting and loading recyclable materials to divert solid waste and address source reduction, recycling, and composting activities.

The Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an on-site recycling area or room of specified size. The Project would also comply with AB 939, AB 341, AB 1826 and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. Since the Project would comply with federal, State, and local statutes and regulations related to solid waste, impacts would be less than significant, and no mitigation measures are required.

Mitigation Measures

Project impacts with regard to utilities and service systems would be less than significant. Therefore, no mitigation measures are required.

Cumulative Impacts

Water

Less Than Significant Impact. Development of the Project, related projects, and the cumulative growth throughout the City of Los Angeles would further increase the demand for potable water within the City of Los Angeles. Through the 2015 Urban Water Management Plan, the LADWP has demonstrated that it can provide adequate water supplies for the City of Los Angeles through the year 2040 with the implementation of conservation strategies and proper supply management. This estimate is based in part on demographic projections obtained for the LADWP service area from the Metropolitan Water District ("MWD"). The MWD utilizes a land-use based planning tool that allocates projected demographic data from the Southern California Association of Governments ("SCAG") into water service areas for each of MWD's member agencies. MWD's

demographic projections use data reported in SCAG's RTP/SCS ("Connect SoCal"). As discussed previously in Section XIV, Population and Housing, the Project's population and employment growth is consistent with SCAG's growth projections for the City of Los Angeles sub region. As such, the additional water demands generated by the Project are accounted for in the 2015 Urban Water Management Plan.

Cumulative Water Demand

For the purposes of evaluating the Project's cumulative impacts related to water infrastructure, the analysis below is based on a review of the related projects identified in Section 3, Project Description, to determine whether any related projects have the potential to result in cumulative impacts associated with connecting to the local water system infrastructure.

Water Infrastructure

The Project and related projects have the potential to increase demands upon the local water infrastructure serving the Project Site and surrounding area. As discussed above, the LAAFP has the capacity to treat approximately 600 million gallons per day, and in 2017 the LADWP's water system supplied 4 million customers with nearly 160 billion gallons of treated water, which averages to a daily water demand of approximately 438 mgd. The remaining capacity of the LAAFP, therefore, is approximately 162 mgd, which may fluctuate depending on the season. Shown in Table 4.38, Estimated Cumulative Water Demand, below, the related projects would generate an average daily water demand of approximately 1,206,098 gpd (approximately 1,351 AFY). This estimate is conservative, as it does not account for any net reduction in water demand associated with infill related projects that displace existing land uses that currently generate a demand for potable water. The estimated cumulative water demand also does not account for water conservation measures, such as the mandatory indoor water reduction rates required by the LA Green Building Code. The Project, in conjunction with the 26 related projects in the LADWP service area would yield a total average daily water demand of approximately 1,248,298 gpd. This represents a fraction of one percent of the LAAFP's approximate total capacity of 600 mgd. Therefore, this cumulative increase in water demand would not measurably impact the LAAFP's treatment capacity, and no new or expanded water treatment facilities would be required.

Additionally, based on the 26 related projects identified in Section 3, Project Description, the only projects within the immediate vicinity of the Project Site include Related Project No. 12, 16, 19, 23, and 24, all of which are located within 500 feet of the Project Site. These are the only related projects that would have the potential to impact the local water lines serving the Project Site. However, similar to the Project, all five of these related projects would be required to consult with the LADWP to ensure the local infrastructure is adequate to serve their projects. In the event that system upgrades are anticipated, the construction impacts associated with such upgrades would be localized in nature and would not combine with the Project's construction impacts resulting in significant physical environmental impacts. With respect to water treatment facilities and infrastructure, the Project, in conjunction with the related projects, would have a less than significant cumulative impact.

Table 4.38
Estimated Cumulative Water Demand

Type of Use	Size	Unit	Water Demand Rate (gpd) [a]	Total Water Demand (gpd)
Related Projects				
Apartment	5,399	du	150 gpd / du	809,850
Office	2,204,418	sf	120 gpd / 1,000 sf	264,531
Restaurant [b]	286,717	sf	300 gpd / 1,000 sf	86,015
Commercial	395,088	sf	50 gpd / 1,000 sf	19,755
Retail	491,877	sf	25 gpd / 1,000 sf	12,297
Hotel	113	rm	120 gpd / rm	13,560
			Total Related Projects Water Demand:	**1,206,098**
			Total Project Water Demand:	42,200
			TOTAL CUMULATIVE:	**1,248,298 (1,399 AFY)**
			Project % of Cumulative:	**3.4%**

Notes: du = dwelling unit; sf = square feet; rm = room; gpd = gallons per day.

[a] *Water demand rate is based on LASAN's Sewage Generation Factor for Residential and Commercial Categories, effective April 6, 2012, as recommended by LADWP in calculating water demand. It is assumed that all water turns into wastewater.*

[b] *Although it is assumed that not all of the restaurant land uses proposed for the related projects would be take out restaurants, it was chosen to provide a conservative estimate since it generates the most water out of all the restaurant options given in the LASAN's Sewage Generation Factor for Residential and Commercial Categories document.*

Source: Parker Environmental Consultants, 2021.

Water Supply

The City of Los Angeles receives water from local groundwater sources, the Los Angeles-Owens River Aqueduct, State Water Project, and from the MWD of Southern California, which is obtained from the Colorado River Aqueduct. The MWD utilizes a land-use based planning tool that allocates projected demographic data from the SCAG into water service areas for each of MWD's member agencies. The 2015 Urban Water Management Plan ("UWMP"), which estimates future demand based on population and growth reported in SCAG's RTP/SCS, projects a total water demand and supply of 675,685 AFY in 2040. With its current water supplies, planned future water conservation, and planned future water supplies, LADWP will be able to reliably provide water to its customers through the year 2040, which includes the Project's buildout year, based on the growth projections in SCAG's RTP/SCS.

In terms of the City's overall water supply, the water demand for projects that are consistent with the allowable land uses, building area, and density contained in the City's General Plan have been taken into account in the planned growth of the water distribution system. Development of each related project would be evaluated on a case-by-case basis to determine if they are consistent with the allowable land uses and densities pursuant to the applicable zoning and land use designation. For projects that meet the requirements established in Sections 10910-10915 of the State Water Code, a Water Supply Assessment ("WSA") report demonstrating sufficient water availability would be required prior to project approval to ensure LADWP has sufficient capacity to serve the project without affecting regional water supplies. This process ensures that

cumulative growth in the City would not exceed the LADWP's future water supplies through 2040 and beyond. Further, the Project and all of the related projects within the City of Los Angeles would be required to meet the prescriptive water conservation plumbing fixture requirements of Sections 99.04.303 and 99.05.303 of the California Green Building Code, which would decrease the Project water demand. Because the LADWP has determined that it can supply the anticipated growth in the City of Los Angeles through the year 2040 and beyond based on the growth projections of the 2015 UWMP, the Project's anticipated water demands are within these growth projections, and the Project's and related projects' compliance with regulatory measures, the Project's cumulative contribution to impacts upon the City's water resources would be less than significant.

Wastewater

Less Than Significant Impact. Implementation of the Project in conjunction with the related projects identified in Section 3, Project Description, would further increase cumulative demands for wastewater treatment within the HWRP service area. As identified in Section 3, Project Description, there are seven related projects within the City of Los Angeles, all of which are within the service area of the HWRP. As shown in Table 4.39, Estimated Cumulative Wastewater Generation, below, the Project, in conjunction with the related projects, would generate approximately 1,241,265 gpd of wastewater (or 1.24 mgd).

Similar to the calculations for water demand, this estimate is conservative as it does not account for the net reduction in wastewater generated by infill developments that are displacing current land use that generate wastewater flows and water conservation measures such as the mandatory indoor water reduction rates required by the LA Green Building Code in new development projects. As discussed above, the HWRP has a design capacity to treat 450 mgd and has a projected wastewater treatment flow of 283 mgd through the year 2040. Based on the HWRP's estimated future capacity through the year 2040, the HWRP is expected to have adequate capacity to accommodate the cumulative wastewater flow of approximately 1.24 mgd from the Project and related projects. In addition, similar to the process for the Project, and in accordance with LAMC Section 64.15, a SCAR analysis would be conducted for each related project to determine if there is adequate capacity existing in the local sewer collection system to convey the newly generated sewage to the appropriate sewage treatment plant, and LAMC Sections 64.11.2 and 64.16.1 will require approval of a sewer permit prior to connection to the sewer system. Through this process, the City would evaluate each related project on a case-by-case basis to ensure the local conveyance system is adequately serviced and maintained to accommodate sewer flows commensurate with new development. Therefore, the Project in combination with the related projects would not require the construction of new wastewater treatment facilities or the expansion of existing wastewater treatment facilities and impacts on wastewater services would be less than significant.

Table 4.39
Estimated Cumulative Wastewater Generation

Type of Use	Size	Unit	Wastewater Generation Rate (gpd)[a]	Total Wastewater Generation (gpd)
Related Projects				
Apartment	5,399	du	150 gpd / du	809,850
Office	2,204,418	sf	120 gpd / 1,000 sf	264,531
Restaurant [b]	286,717	sf	300 gpd / 1,000 sf	86,015
Commercial	395,088	sf	50 gpd / 1,000 sf	19,755
Retail	491,877	sf	25 gpd / 1,000 sf	12,297
Hotel	113	rm	120 gpd / rm	13,560
Total Related Projects Water Demand:				**1,206,098**
Total Project Water Demand:				35,167
TOTAL CUMULATIVE:				**1,241,265 (1,390 AFY)**
Project % of Cumulative:				**2.8%**

Notes: du = dwelling unit; sf = square feet; gpd = gallons per day; rm = room

[a] *Water demand rate is based on LASAN's Sewage Generation Factor for Residential and Commercial Categories, effective April 6, 2012.*

[b] *Although it is assumed that not all of the restaurant land uses proposed for the related projects would be take out restaurants, it was chosen to provide a conservative estimate since it generates the most water (and thus wastewater) out of all the restaurant options given in the LASAN's Sewage Generation Factor for Residential and Commercial Categories document.*

Source: Parker Environmental Consultants, 2021.

Solid Waste

Less Than Significant Impact. The impacts of the continued growth of the region would likely have the effect of diminishing the daily excess capacity of the regional landfills, including the Sunshine Canyon Landfill, which serves the Project Site. The Sunshine Canyon Landfill has a remaining capacity of 55.1 million tons and an estimated remaining life of 18 years (as of December 31, 2019).[143] As discussed above, the Project would contribute approximately 4.46 tons of solid waste per day (tpd) to the Sunshine Canyon Landfill, which represents approximately 0.036 percent of the remaining daily capacity of the landfill (12,100 tpd). While this is the primary local landfill that would accommodate the Project's waste stream, there are several other landfill facilities within the County and out of County that serve the regional solid waste demands of the City of Los Angeles and County of Los Angeles.

For purposes of determining the cumulative impacts of the Project in conjunction with the related projects identified in Section 3, Project Description, the cumulative solid waste generation of all 26 related projects was calculated based on generation factors provided in the LA CEQA Thresholds Guide. As shown in Table 4.40, below, the Project, in conjunction with the related

[143] *County of Los Angeles Department of Public Works, The Countywide Integrated Waste Management Plan 2019 Annual Report, September 2020, website: https://pw.lacounty.gov/epd/swims/ShowDoc.aspx?id=14372&hp=yes&type=PDF, accessed February 2021.*

projects, would generate a total of approximately 206,354 lbs/day of solid waste or approximately 103.2 tpd.

Table 4.40
Estimated Cumulative Solid Waste Generation

Land Use	Quantity [a]			Solid Waste Generation Rate [c]	Solid Waste Generation (lbs/day)
Related Projects					
	du	**unit**	**emp [b]**		
Apartments	5,399	--	--	12.23 lbs/du	66,030
Office	--	2,204,418 sf	8,818	10.53 lbs/emp	92,854
Restaurant – Fast Food [d]	--	286,717 sf	1,921	10.53 lbs/emp	20,228
Commercial	--	395,088 sf	790	10.53 lbs/emp	8,319
Retail	--	491,877 sf	984	10.53 lbs/emp	10,362
Hotel	--	113 rm	57	10.53 lbs/emp [e]	600
Related Projects Solid Waste Generation					***198,393***
Project Operational Solid Waste Generation					*7,961*
Cumulative Total Solid Waste Generation					**206,354 (103.2 tpd)**
Project % of Cumulative					**3.9%**

Notes: du = dwelling units; sf = square feet, emp = employees; lbs = pounds; tpd = tons per day.

[a] *The quantity in terms of dwelling units and square footage is based on Table 3.5, Related Projects List, in Section 3, Project Description.*

[b] *Number of employees is based on the LADOT's City of Los Angeles VMT Calculator Documentation, Table 1: Land Use and Trip Generation Base Assumptions, May 2020.*

[c] *The solid waste generation rates, provided in the L.A. CEQA Threshold Guide, are based on either dwelling units for all residential land uses or employees for commercial land uses.*

[d] *Although it is assumed that not all proposed restaurant land uses for the related projects would be fast food restaurants, it was chosen to provide a conservative estimate since fast food restaurants generate the largest number of employees based on LADOT's City of Los Angeles VMT Calculator Documentation, Table 1: Land Use and Trip Generation Base Assumptions, November 2019.*

[e] *Although the L.A. CEQA Thresholds Guide does not provide a generation rate for Hotel uses, a generation rate of 10.53 lbs per employee from Commercial was applied to provide a quantitative analysis.*

Source: Parker Environmental Consultants, 2021.

As of December 2019, there was an estimated 148.40 million tons of permitted solid waste disposal capacity remaining within the County, with a maximum daily intake capacity of 42,297 tpd.[144] The total combined in-County landfill disposal rate in 2019 was reported to be approximately 16,756 tpd.[145] The 103.2 tpd that are estimated to be generated by the Project and related projects combined, represents approximately 0.62 percent of the existing available daily permitted capacity of all of the in-County facilities. Additionally, the Countywide Integrated Waste Management Plan also accounts for cumulative waste generation for the 15-year period ending in 2034. Therefore, cumulative waste generation produced by the Project and related projects is accounted for in the CIWMP. Because of this, and since there is currently adequate capacity to

[144] *County of Los Angeles Department of Public Works, The Countywide Integrated Waste Management Plan 2019 Annual Report, September 2020 (at Appendix E-2 Table 4), website: https://pw.lacounty.gov/epd/swims/ShowDoc.aspx?id=14372&hp=yes&type=PDF, accessed February 2021.*

[145] *Ibid.*

accommodate the cumulative disposal needs of the Project and related projects, cumulative impacts with respect to solid waste would be less than significant.

Moreover, as of 2012, the City of Los Angeles achieved a landfill diversion rate of 76.4%, based upon the calculation methodology adopted by the State of California.[146] Waste diversion rates are required to increase to 75 percent by 2025 and through on-going development of waste management infrastructure over the last decade and innovative source reduction, reuse, recycling, and composting programs have been implemented. The City is also developing programs to ultimately meet a goal of zero waste by 2030. Thus, the Project's contribution to cumulative impacts would continue to decrease as it increases waste diversion rates in accordance with City goals. Additionally, as with the Project, other related projects would participate in regional source reduction and recycling programs significantly reducing the amount of solid waste deposited in area landfills. Therefore, the Project's contribution to cumulative solid waste impacts would be less than cumulatively considerable, and cumulative impacts with respect to solid waste would be less than significant.

Mitigation Measures

Cumulative impacts with regard to utilities and service systems would be less than significant. Therefore, no mitigation measures are required.

XX. Wildfire

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒

[146] *City of Los Angeles, Bureau of Sanitation, Zero Waste Progress Report, March 2013, website: https://planning.lacity.org/eir/8150Sunset/References/4.K.3.%20Solid%20Waste/SW.04_Zero%20Waste%20Progress%20Report_March%202013.pdf, accessed August 2020.*

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

Responses a through d: No Impact. A potential significant impact upon wildfire hazards could occur if the Project Site were to be located on state responsibility areas or lands classified as very high fire hazard severity zones. Lands subject to this provision have been designated by the City of Los Angeles Fire Department pursuant to Government Code 51178 that were identified and recommended to local agencies by the Director of Forestry and Fire Protection based on criteria that includes fuel loading, slope, fire weather, and other relevant factors. These areas must comply with the Brush Clearance Requirements of the Fire Code. The Very High Fire Hazard Severity Zone ("VHFHSZ") was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone." The Project Site is not located within a state responsibility area or land classified as a very high fire hazard severity zone. Therefore, this checklist question is not applicable to the Project and no impact would occur.

Mitigation Measures

Project and cumulative impacts with regard to wildfire risk would be less than significant. Therefore, no mitigation measures are required.

XXI. Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially 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, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

a) Does the project have the potential to substantially 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, substantially 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?

Less Than Significant Impact. A significant impact would occur only if the Project results in potentially significant impacts for any of the above issues. The Project is located in a densely populated urban area and would have no unmitigated significant impacts with respect to biological resources or California's history or pre-history. As noted in the analysis above, the western half of the Project Site is developed with a four-story mixed-use office and ground floor commercial building with two levels of subterranean parking. The eastern half of the Project Site, the Development Site for the Project, is developed with a surface parking lot for the 640 S. Santa Fe Avenue Project. The Project would redevelop the surface parking lot into a 14-story office and ground floor commercial building, with two levels of subterranean parking and five levels of parking above grade. The Project Site does not support any substantial habitat of a fish or wildlife species. There is currently no vegetation on site (see Figures 3.4 and 3.5). As such, the Project would not have the potential to conflict with the Los Angeles Tree Ordinance No. 177,404. The Project Site is located approximately 375 feet west of the Los Angeles River. However, due to its distance from the River, the Project would not interfere with the movement of any migratory fish and would likely not interfere with any wildlife species or corridor along the River. Therefore, the Project would have a less than significant impact on biological resources.

Additionally, although no known direct impacts to archaeological resources are anticipated, implementation of the City's standard condition of approval for addressing inadvertent finds would ensure any impacts upon cultural resources are reduced to a less than significant level in the unlikely event any such archaeological materials are accidentally discovered during the construction process.

With respect to paleontological resources, excavations that extend down below five feet may encounter significant fossil vertebrate specimens. Any substantial excavations below the uppermost layers in the area of the Project, therefore, should be monitored closely to quickly and professionally recover any fossil remains discovered while not impeding development. With adherence to regulatory compliance measures, any impacts to paleontological resources would be reduced to a less-than-significant level.

With adherence to regulatory compliance measures, the Project would not have the potential to degrade the quality of the environment, reduce or threaten any fish or wildlife species (endangered or otherwise), or eliminate important examples of the major periods of California history or pre-history, and impacts would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if the Project, in conjunction with other related projects in the area of the Project Site, would result in impacts that would be less than significant when viewed separately, but would be significant when viewed together. As concluded in the analysis provided under each Checklist Question above, the Project's incremental contribution to cumulative impacts related to aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, energy, geology/soils, greenhouse gas emissions, hazards/hazardous materials, hydrology/water quality, land use/planning, mineral resources, noise, population/housing, public services, recreation, transportation, tribal cultural resources, utilities, and wildland fire hazards would be less than significant. As such, the Project's contribution to cumulative impacts would be less than significant.

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

Less Than Significant with Mitigation Incorporated. A significant impact may occur if the Project has the potential to result in significant impacts, as discussed in the preceding sections. Based on the preceding environmental analysis, the Project would result in a potentially significant impact with respect to work-related VMT prior to mitigation (see Environmental Checklist Question XVII. Transportation, above). With incorporation of mitigation measure TR-1, the Project's work related VMT impact would be reduced to less than significant levels. Thus, with mitigation, any potentially significant impacts to humans would be less than significant.

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6. References Acronyms and Abbreviations

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2. Acronyms and Abbreviations

AAM	Annual Arithmetic Mean
AB	Assembly Bill
ACM	Asbestos-containing materials
AEP	Association of Environmental Professionals
AFY	Acre-feet per year
APN	Assessor Parcel Number
AQMP	Air Quality Management Plan
ASTM	American Society of Testing and Materials
ASTs	above-ground storage tanks
ATCS	Adaptive Traffic Control System
Basin	South Coast Air Basin
BMPs	Best Management Practices
C/D	construction/demolition
CAA	Clean Air Act
CAAQS	California ambient air quality standards
Caltrans	California Department of Transportation
Cal/EPA	California Environmental Protection Agency
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CAT	Climate Action Team
CBC	California Building Code (2007)
CCAA	California Clean Air Act
CCAR	California Climate Action Registry
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CDMG	California Division of Mines and Geology
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
Cf	Cubic feet
CFC	Chlorofluorocarbons
CGS	California Geological Survey
CH_4	Methane
CHMIRS	California Hazardous Material Incident Report System
CiSWMPP	City of Los Angeles Solid Waste Management Policy Plan
CIWMA	California Integrated Waste Management Act
CLARTS	Central Los Angeles Refuse Transfer Station

CMP	Congestion Management Plan
CNEL	Community Noise Exposure Level
CO	carbon monoxide
CO_2	carbon dioxide
CO2e	carbon dioxide equivalent
COHb	carboxyhemoglobin
COPC	Chemical of Potential Concern
CORRACTS	Corrective Action Treatment, Storage, and Disposal Facilities
CPA	Community Plan Area
CPT	cone penetrometer test
CPU	Crime Prevention Unit
CRA/LA	Community Redevelopment Agency of the City of Los Angeles
CUP	conditional use permit
CWA	Clean Water Act
CWC	California Water Code
cy	cubic yards
dB	decibel
dBA	A-weighted decibel scale
d/D	flow level
DHS	California Department of Health and Services
DOGGR	California Department of Conservation Division of Oil, Gas, and Geothermal Resources
DWP	Department of Water and Power
DWR	California Department of Water Resources
du	dwelling unit
EIR	Environmental Impact Report
EMS	Emergency Medical Service
EOO	Emergency Operations Organization
EPA	Environmental Protection Agency
ERNS	Emergency Response Notification System
EZ	Los Angeles State Enterprise Zone
FAR	Floor Area Ratio
FCAA	Federal Clean Air Act
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FTIP	Federal Transportation Improvement Program
GBCI	Green Building Certification Institute
GHG	greenhouse gas
gpd	gallons per day
gpm	gallons per minute
GWP	Global Warming Potential
HFC	hydrofluorocarbons
HQTA	High-Quality Transit Areas
HSA	Hyperion Service Area
HTP	Hyperion Treatment Plant
HVAC	Heating, Ventilation and Air Conditioning
I-101	Hollywood Freeway
ISO	Interim Control Ordinance
ITE	Institute of Transportation Engineers
km	kilometers
kV	kilovolt
kWh	kilowatt-hours

LAA	Los Angeles Aqueduct
LAAFP	Los Angeles Aqueduct Filtration Plant
LABC	City of Los Angeles Building Code
LABS	Los Angeles Department of Public Works Bureau of Sanitation
LADBS	Los Angeles Department of Building and Safety
LADOT	Los Angeles Department of Transportation
LADRP	Los Angeles Department of Recreation and Parks
LADWP	Los Angeles Department of Water and Power
LAFD	Los Angeles Fire Department
LAMC	Los Angeles Municipal Code
LAPD	Los Angeles Police Department
LAPL	Los Angeles Public Library
LARWQCB	Los Angeles Regional Water Quality Control Board
LAUSD	Los Angeles Unified School District
LBP	Lead-based paint
lbs/day	pounds per day
LCFS	Low Carbon Fuel Standard
L_{dn}	day-night average noise level
LEED	Leadership in Energy and Environmental Design
L_{eq}	equivalent energy noise level/ambient noise level
LID	Low Impact Development
LOS	Level of Service
LST	localized significance thresholds
LUST	leaking underground storage tank
LUTP	Land Use/Transportation Policy
MBTA	Migratory Bird Treaty Act
MCE	Maximum Considered Earthquake
MEP	maximum extent practicable
MERV	Minimum Efficiency Reporting Value
Metro	Los Angeles County Metropolitan Transit Authority
mgd	million gallons per day
mi	miles
MPO	Metropolitan Planning Organization
MS4	medium and large municipal separate storm sewer systems
msl	mean sea level
mm	millimeters
M_{max}	maximum moment magnitude
MTA	Metropolitan Transportation Authority
MWD	Metropolitan Water District
MWh	Mega-Watt hours
N_2O	nitrous oxide
NAAQS	National ambient air quality standards
NAHC	Native American Heritage Commission
NFRAP	No Further Remedial Action Planned Sites
NO_2	nitrogen dioxide
NOP	Notice of Preparation
NOx	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NPL	National Priorities List
O_3	Ozone
OAL	California Office of Administrative Law
OPR	Office of Planning and Research

Pb	lead
PCB	polychlorinated biphenyl
PCE	tetrachloroethylene
PEC	Potential environmental concern
PFC	perfluorocarbons
PGA	peak horizontal ground acceleration
PM	particulate matter
PM_{10}	respirable particulate matter
$PM_{2.5}$	fine particulate matter
ppd	pounds per day
ppm	parts per million
PSI	pounds per square inch
PUC	Public Utilities Commission (also see CPUC)
PWS	Public water suppliers
RCP	Regional Comprehensive Plan
RCPG	Regional Comprehensive Plan and Guide
RCRA	Resource Conservation Recovery Act
RD	Reporting District
REC	Recognized Environmental Condition
ROG	Reactive Organic Gases
ROWD	Report of Waste Discharge
RTP	Regional Transportation Plan
RTP/SCS	Regional Transportation/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCG	Southern California Gas Company
SCH	State Clearinghouse
sf	square feet
SF_6	sulfur hexafluoride
SIP	State Implementation Plan
SLIC	Spills, Leaks, Investigation and Cleanup
SO_2	sulfur dioxide
SO_4	sulfates
SOx	sulfur oxides
SOPA	Society of Professional Archeologist
SPT	Standard Penetration Test
SR-110	Harbor Freeway
SRA	source receptor area
SRRE	Source Reduction and Recycling Element
SUSMP	Standard Urban Storm Water Mitigation Plan
SWAT	Solid Waste Assessment Test
SWF/LF	Solid Waste Information System
SWFP	Solid Waste Facility Permit
SWMP	Stormwater Management Plan
SWMPP	Solid Waste Management Policy Plan
SWP	State Water Project
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resource Control Board
TAC	Toxic Air Contaminants

TCM	transportation control measures
TDM	Transportation Demand Management Plan
TFAR	Transfer of Floor Area Rights
TIA	Traffic Impact Assessment
TOD	Transit Oriented District
TPH	total petroleum hydrocarbons
TSD	Treatment, Storage, and Disposal
TSP	Transportation Specific Plan
ULSD	Ultra Low Sulfur Diesel
US-101	Hollywood Freeway
U.S.EPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGBC	United States Green Building Council
USGS	U.S. Geological Survey
UST	underground storage tank
UWMP	Urban Water Management Plan
V/C	Volume-to-Capacity
VCP	Voluntary Cleanup Plan
VdB	Vibration decibels
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compound
VRF	Variable Refrigerant Flow Air-conditioning
WE	Water Efficiency
WMA	Watershed Management Area
WMUDS	Waste Management Unit Database System
WSA	Water Supply Assessment
µg/m3	micrograms per cubic meter
ZIMAS	Zoning Information and Map Access System