LOS ANGELES
DEPARTMENT OF CITY
PLANNING
221 North Figueroa St., Suite 1350
Los Angeles, CA 90012

INITIAL STUDY

Violet Street Creative Office Campus Project

Case Number: ENV-2021-2232-EIR

Project Location: 2030, 2034, 2038, 2042, 2046, 2054, and 2060 East 7th Street; 715, 721, 725, 729, 733, 777, 801, 805, 809, 813, 817, 821, 825, 827, and 829 East Santa Fe Avenue; 2016, 2020, 2023, 2026, 2027, 2030, 2031, 2034, 2035, 2037,2038, 2040; and 2043 East 7th Place and 2017, 2023, 2027, 2031, 2035, 2039, 2045, and 2051 Violet Street, Los Angeles, California 90021.

Community Plan Area: Central City North

Council District: 14—de León

Project Description: The Violet Street Creative Office Campus Project (Project) is a new creative office campus with uses spanning existing and proposed buildings on an approximately 273,930 square-foot (6.3 acre) site. Construction of the Project would require the demolition of the existing 25,798 square feet of warehouse uses, 9,940 square feet of office uses, and associated surface parking, all located on the southwest portion of the Project Site. The remainder of the Project Site is developed with the existing 244,795-square-foot Warner Music Group building (originally the Ford Factory building) and a five-story parking garage (including a roof-top level), which would be retained as part of the Project. The Project proposes a 13-story, approximately 450,599 square-foot building featuring 435,100 square feet of office uses, 15,499 square-feet of ground floor retail and/or restaurant uses, and 1,264 automobile parking spaces located in a seven-story parking garage, comprised of one at-grade, two above-grade, and four below-grade levels. While not required, approximately 74,018 square feet of outdoor areas would be provided. The Applicant is requesting a General Plan Amendment to designate a portion of the Project Site's land use from Heavy Manufacturing to Regional Center Commercial and a Vesting Zone Change from the M3-1-RIO zone to C2-2-RIO zone. If approved, the Project's maximum floor area ratio (FAR) would be 6:1, permitting 661,800 square feet of development. Additionally, the Applicant is requesting a Floor Area Averaging Conditional Use Permit which would allow the remaining 211,201 square feet of floor area to be averaged across the entire Project Site as a Unified Development. Accordingly, the Project includes a Future Campus Expansion Phase which encompasses a potential expansion opportunity for additional office use to be developed within the Project Site at the corner of Violet Street and Santa Fe Avenue. Construction of the Future Campus Expansion Phase would require the demolition of an existing 21,880 square foot building containing office uses. For purposes of this analysis, this Future Campus Expansion Phase would be comprised of office uses, but this portion of the Project Site could be utilized for any uses consistent with the existing M3-1-RIO zone.

PREPARED FOR:
The City of Los Angeles
Department of City Planning

PREPARED BY:
Eyestone Environmental, LLC

APPLICANT:
AI Violet, LLC and AI Violet B2, LLC

November 2021

TABLE OF CONTENTS

Page

Introduction **1**

Executive Summary **4**

Project Description **7**

1. Project Summary 7
2. Environmental Setting 7
3. Description of Project 11
4. Requested Permits and Approvals 18
5. Responsible Public Agencies 19

Environmental Impact Analysis **20**

I. Aesthetics 20
II. Agriculture and Forestry Resources 30
III. Air Quality 33
IV. Biological Resources 35
V. Cultural Resources 39
VI. Energy 41
VII. Geology and Soils 42
VIII. Greenhouse Gas Emissions 49
IX. Hazards and Hazardous Materials 50
X. Hydrology and Water Quality 60
XI. Land Use and Planning 67
XII. Mineral Resources 69
XIII. Noise 70
XIV. Population and Housing 71
XV. Public Services 73
XVI. Recreation 77
XVII. Transportation 78
XVIII. Tribal Cultural Resources 80
XIX. Utilities and Service Systems 81
XX. Wildfire 90
XXI. Mandatory Findings of Significance 91

Appendices

Appendix IS-1	Tree Report
Appendix IS-2	Geotechnical Assessment
Appendix IS-3	Paleontological Records Search
Appendix IS-4	Phase I ESA
Appendix IS-5	Ford Factory ESA
Appendix IS-6	Hydrology Report
Appendix IS-7	Wastewater Report

List of Figures

		Page
Figure 1	Project Location Map	8
Figure 2	Aerial Photograph of the Project Site and Vicinity	9
Figure 3	Lot Line Diagram	12
Figure 4	Conceptual Site Plan	13
Figure 5	Proposed Rendering	15

List of Tables

Page

Table 1 Summary of Existing and Proposed Floor Area 14
Table 2 Estimated Project Wastewater Generation 83
Table 3 Project Demolition and Construction Waste Generation 88
Table 4 Estimated Project Solid Waste Generation 89

1 INTRODUCTION

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

This Initial Study evaluates the potential environmental effects that could result from the construction, implementation, and operation of the Project. This Initial Study has been prepared in accordance with CEQA (Public Resources Code Section 21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations, Section 15000 et seq.), and the City of Los Angeles CEQA Threshold Guidelines (1981, amended 2006). The City uses Appendix G of the State CEQA Guidelines as the thresholds of significance unless another threshold of significance is expressly identified in the document. Based on the analysis provided within this Initial Study, the City has concluded that the Project may result in significant impacts on the environment, and the preparation of an Environmental Impact Report (EIR) is required. This Initial Study and the forthcoming EIR are intended as informational documents, which are ultimately required to be considered and certified by the decision-making body of the City prior to approval of the Project.

1.1 PURPOSE OF AN INITIAL STUDY

The California Environmental Quality Act was enacted in 1970 with several basic purposes, including: (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 Initial Study 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 Initial Study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, the Lead Agency shall prepare a Negative Declaration. If the Initial Study identifies potentially significant effects but revisions have been made by or agreed to by the applicant that would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, a Mitigated Negative Declaration is appropriate. If the Initial Study concludes that neither a Negative Declaration or Mitigated Negative Declaration is appropriate, an EIR is normally required.[1]

[1] State CEQA Guidelines Section 15063(b)(1) identifies the following three options for the Lead Agency when there is substantial evidence that the project may cause a significant effect on the environment: "(A) Prepare an EIR, or (B) Use a previously prepared EIR which the Lead Agency determines would adequately analyze the project at hand, or (C) Determine, pursuant to a program EIR, tiering, or another appropriate process, which of a project's effects were adequately examined by an earlier EIR or negative declaration.

1.2 ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into sections as follows:

1. INTRODUCTION

Describes the purpose and content of the Initial Study and provides an overview of the CEQA process.

2. EXECUTIVE SUMMARY

Provides Project information, identifies key areas of environmental concern, and includes a determination whether the Project may have a significant effect on the environment.

3. PROJECT DESCRIPTION

Provides a description of the environmental setting and the Project, including project characteristics and a list of discretionary actions.

4. EVALUATION OF ENVIRONMENTAL IMPACTS

Contains the completed Initial Study Checklist and discussion of the environmental factors that would be potentially affected by the Project.

1.3 CEQA PROCESS

Below is a general overview of the CEQA process. The CEQA process is guided by the CEQA statutes and guidelines, which can be found on the State of California's website (http://resources.ca.gov/ceqa).

1.3.1 Initial Study

At the onset of the environmental review process, the City has prepared this Initial Study to determine if the Project may have a significant effect on the environment. This Initial Study has determined that the Project may have a significant effect(s) on the environment and an EIR will be prepared.

A Notice of Preparation (NOP) is prepared to notify public agencies and the general public that the Lead Agency is starting the preparation of an EIR for the Project. The NOP and Initial Study are circulated for a 30-day review and comment period. During this review period, the Lead Agency requests comments from agencies and the public on the scope and content of the environmental information to be included in the EIR. After the close of the 30-day review and comment period, the Lead Agency continues the preparation of the Draft EIR and any associated technical studies, which may be expanded in consideration of the comments received on the NOP.

1.3.2 Draft EIR

Once the Draft EIR is complete, a Notice of Completion and Availability is prepared to inform public agencies and the general public of the availability of the document and the locations where the document

can be reviewed. The Draft EIR and Notice of Availability are circulated for a 45-day review and comment period. The purpose of this review and comment period is to provide public agencies and the general public an opportunity to review the Draft EIR and comment on the adequacy of the document, including the analysis of environmental effects, the mitigation measures presented to reduce potentially significant impacts, and the alternatives analysis. After the close of the 45-day review and comment period, responses to all comments on environmental issues received during the comment period are prepared.

1.3.3 Final EIR

The Lead Agency prepares a Final EIR, which incorporates the Draft EIR or any revisions to the Draft EIR, comments received on the Draft EIR and list of commenters, and responses to significant environmental points raised in the review and consultation process.

The decision-making body then considers the Final EIR, together with any comments received during the public review process, and may certify the Final EIR and approve the Project. In addition, when approving a project for which an EIR has been prepared, the Lead Agency must prepare findings for each significant effect identified, a statement of overriding considerations if there are significant impacts that cannot be mitigated, and a mitigation monitoring and reporting program.

2 EXECUTIVE SUMMARY

PROJECT TITLE	**Violet Street Offices LA**
ENVIRONMENTAL CASE NO.	ENV-2021-2232-EIR
RELATED CASES	CPC-2021-2231-GPA-VZC-HD-VCU-ZV-SPR / VTT-83382

PROJECT LOCATION	2030, 2034, 2038, 2042, 2046, 2054, and 2060 East 7th Street; 715, 721, 725, 729, 733, 777, 801, 805, 809, 813, 817, 821, 825, 827, and 829 East Santa Fe Avenue; 2016, 2020, 2023, 2026, 2027, 2030, 2031, 2034, 2035, 2037,2038, 2040; and 2043 East 7th Place and 2017, 2023, 2027, 2031, 2035, 2039, 2045, and 2051 Violet Street, Los Angeles, California 90021
COMMUNITY PLAN AREA	Central City North
EXISTING GENERAL PLAN DESIGNATION	Heavy Manufacturing
EXISTING ZONING	M3-1-RIO
COUNCIL DISTRICT	14—de León

LEAD AGENCY	**City of Los Angeles**
CITY DEPARTMENT	Department of City Planning
STAFF CONTACT	Rey Fukuda
ADDRESS	**221 North Figueroa Street, Suite 1350, Los Angeles, CA 90012**
PHONE NUMBER	(213) 847-3686
EMAIL	rey.fukuda@lacity.org

APPLICANT	**AI Violet, LLC and AI Violet B2, LLC**
ADDRESS	444 S. Flower Street, Suite 2100, Los Angeles, CA 90071
PHONE NUMBER	(213) 629-5200

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

☐ Aesthetics	☒ Greenhouse Gas Emissions	☒ Public Services
☐ Agriculture & 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

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.

Rey Fukuda, Planning Assistant	November 5, 2021
PRINTED NAME, TITLE	**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.

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The Violet Street Creative Office Campus Project (Project) is a new creative office campus with uses spanning existing and proposed buildings on an approximately 273,930 square-foot (6.288 acre) site. Construction of the Project would require the demolition of the existing 25,798 square feet of warehouse uses, 9,940 square feet of office uses, and associated surface parking, all located on the southwest portion of the Project Site. The remainder of the Project Site is developed with the existing 244,795-square-foot Warner Music Group building (originally the Ford Factory building) and a five-story parking garage (including a roof-top level), which would be retained as part of the Project. The Project proposes a 13-story, approximately 450,599 square-foot building featuring 435,100 square feet of office uses[2], 15,499 square-feet of ground floor retail and/or restaurant uses, and 1,264 automobile parking spaces located in seven-story parking garage, comprised of one at-grade, two above-grade, and four below-grade levels. While not required, approximately 74,018 square feet of outdoor areas would be provided. The Applicant is requesting a General Plan Amendment to designate a portion of the Project Site's land use from Heavy Manufacturing to Regional Center Commercial and a Vesting Zone Change from the M3-1-RIO zone to C2-2-RIO zone. If approved, the Project's maximum floor area ratio (FAR) would be 6:1, permitting 661,800 square feet of development. Additionally, the Applicant is requesting a Floor Area Averaging Conditional Use Permit which would allow the remaining 211,201 square feet of floor area to be averaged across the entire Project Site as a Unified Development. Accordingly, the Project includes a Future Campus Expansion Phase which encompasses a potential expansion opportunity for additional office use to be developed within the Project Site at the corner of Violet Street and Santa Fe Avenue. Construction of the Future Campus Expansion Phase would require the demolition of an existing 21,880 square foot building containing office uses. For purposes of this analysis, this Future Campus Expansion Phase would be comprised of office uses, but this portion of the Project Site could be utilized for any uses consistent with the existing M3-1-RIO zone.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

The 273,930-square-foot (6.288 acre) Project Site is comprised of four parcels, within the Central City North Community Plan area of Downtown Los Angeles.[3] As shown in Figure 1 and in Figure 2 on pages 8 and 9, the Project Site is generally flat , irregularly shaped and is bounded by 7th Street to the north, Santa Fe Avenue to the east, Violet Street to the south, and various public alleyways to the west. The site is partially bisected by 7th Place, an east/west Collector Street, which terminates within the Project Site and provides vehicular access to Mateo Street to the west. A public alleyway traverses the Project Site, running north/south between the terminus of 7th Place and Violet Street. The Project Site has 320-feet of

[2] Square footage includes back of house uses and restroom square footage.

[3] Lot 1 is located at 2016, 2020, 2026, 2030, 2034, 2038, and 2040 7th Place and 2017, 2023, 2027, 2031, 2035, 2039, and 2045 Violet Street; Lot 2 is located at 2030, 2034, 2038, and 2042 7th Street and 2023, 2027, 2031, 2035, 2037, and 2043 7th Place; Lot 3 is located at 2046, 2054, and 2060 7th Street and 715, 721, 725, 720, 733, 777, 801, 805, 809, 813, and 817 Santa Fe Avenue; and Lot 4 is located at 821, 825, 827, and 829 Santa Fe Avenue and 2051 Violet Street.

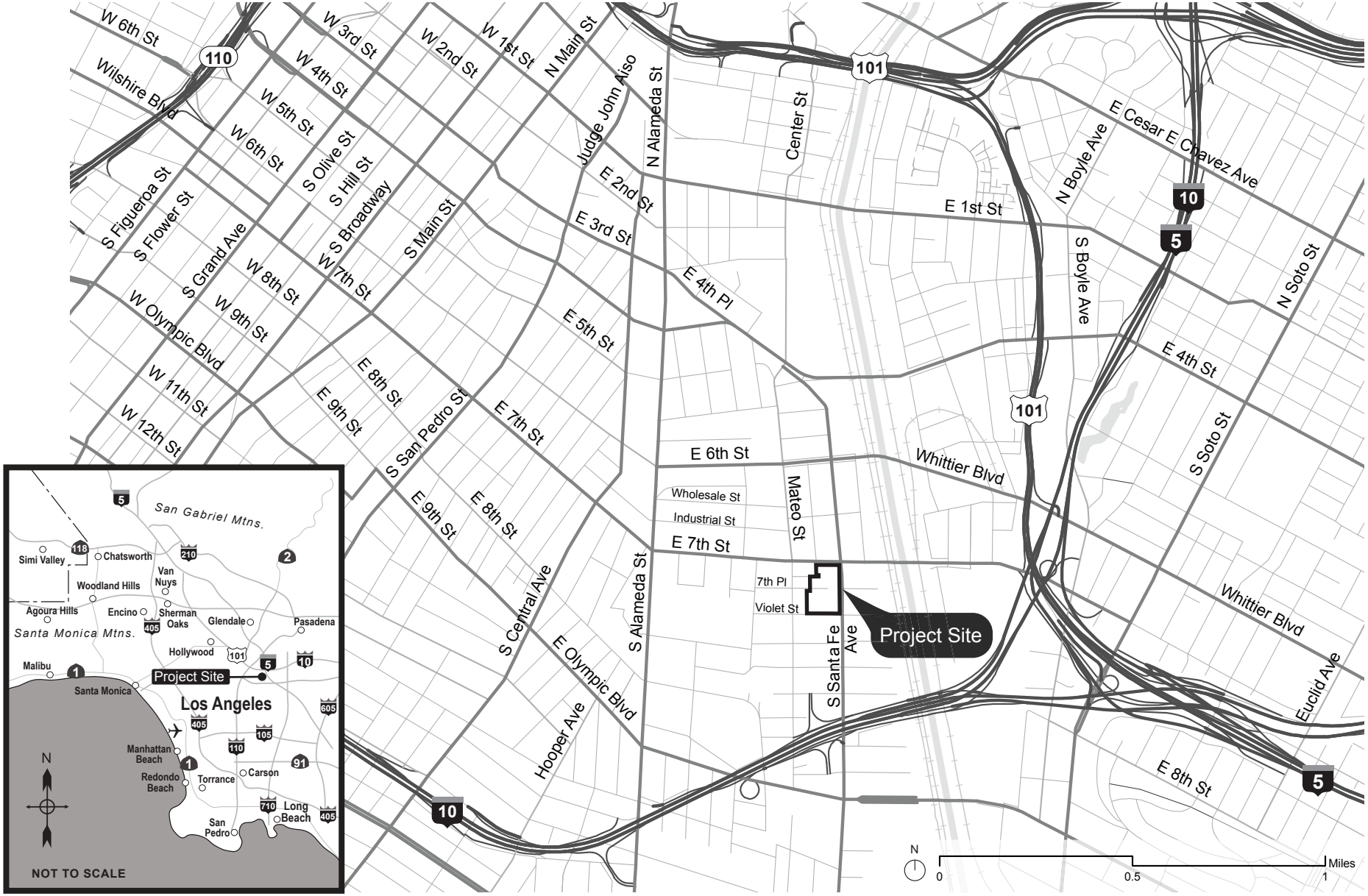

Figure 1
Project Location Map

Source: Los Angeles County GIS, 2018; Eyestone Environmental, 2021.

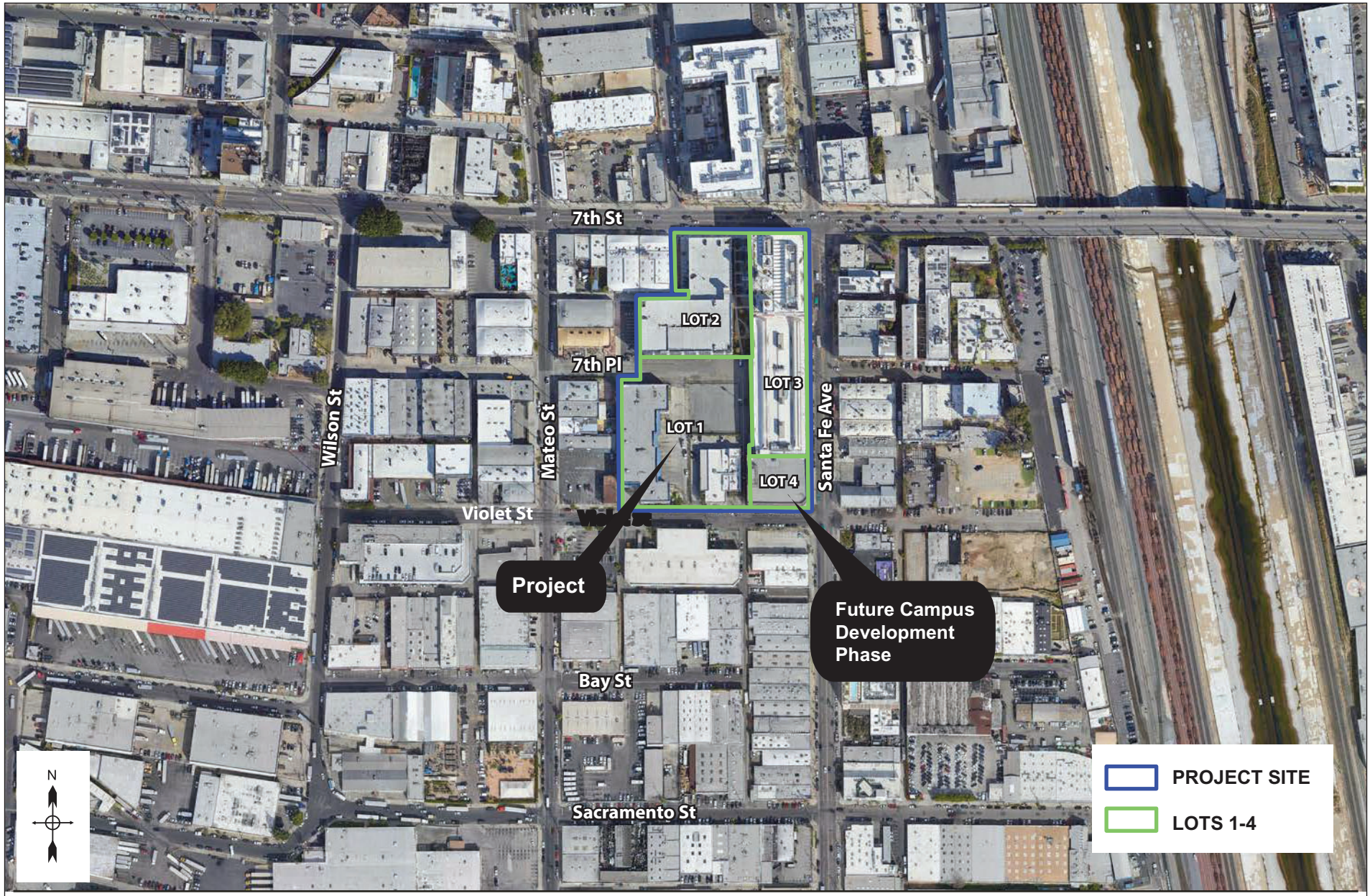

Figure 2
Aerial Photograph of Project Site and Vicinity

Source: Google Earth Pro 2021; Eyestone Environmental, 2021.

frontage on 7th Street, 660 feet of frontage on Santa Fe Avenue, 473 feet of frontage on Violet Street, and 502 feet of frontage along the westerly alley.

3.2.2 Existing Conditions

The Project Site is comprised of four lots. Lot 1, located at the southwest corner of the Project Site (2045 E. Violet Street and 2020 E. 7th Place) is improved with 25,798 square feet of warehouse uses and 9,940 square feet of office uses, along with associated surface parking and truck loading areas. Lot 2, located at the northwest corner of the Project Site (2030 E. 7th Street) is developed with a five-story, 163,804-square-foot, 604-stall vehicle parking garage with a rooftop level. The at-grade and above-grade parking structure has vehicular ingress and egress from 7th Street and 7th Place. Lot 3, located at the northeastern portion of the Project Site (777 S. Santa Fe Avenue) along Santa Fe Avenue between 7th Street and Violet Street is currently improved with a two- and five-story 244,795 square-foot office building currently occupied by Warner Music Group.[4] Constructed in 1913, this building originally served as a factory and warehouse for the Ford Motor Company and in 2015 was renovated to accommodate offices, retail, and restaurant. Lot 4, located at the southeast corner of the Project Site (2051 E. Violet Street) is developed with a 21,880 square foot warehouse with one story and a mezzanine. The Project Site also includes an alley that connects the terminus of 7th Place to Violet Street, as well as portions of 7th Place.

The Project Site is located within the Central City North Community Plan area and has a Heavy Manufacturing General Plan Land Use designation with the corresponding zone of M3-1-RIO (Heavy Manufacturing, Height District 1, River Improvement Overlay District). This zone permits a wide variety of industrial, manufacturing, and storage uses, as well as office and commercial uses. Height District 1 allows a 1.5:1 FAR with no height or story limit. The RIO designation is for the City's River Improvement Overlay (RIO) district, which is designed to provide for preservation of tributaries and rivers in the City of Los Angeles by promoting river identity, supporting local species, and convenient access, among many other aspects The Project Site is also located within a Transit Priority Area (TPA), the Los Angeles State Enterprise Zone, the Central Industrial Redevelopment Project Area, and within a Tier 3 Transit Oriented Communities (TOC) area.

Regional access to the Project Site is provided by the Hollywood Freeway (US-101), the Santa Monica Freeway (I-10), and the Golden State Freeway (I-5), which are accessible within approximately 1 mile of the Project Site. Local access to the Project Site is provided by several local streets and avenues, including South Santa Fe Avenue, Violet Street, Mateo Street 7th Street, and Alameda Street, which provides access to Union Station. The Project Site is also well served by a variety of public transit options, including local and regional bus lines, subway stations, and regional rail service. In particular, the Project Site is located approximately 1.4 miles from the Los Angeles County Metropolitan Transit Authority (Metro) L (Gold) Line Little Tokyo/Arts District Station. The Project Site is also served by the Metro Local Bus Lines 18, 60, and 62, which provide connections to Downtown subway stations, including Pershing Square and 7th Street/Metro Center.

[4] The Warner Music Group building includes ancillary café uses, but these are not open to the public and are considered part of the office use.

3.2.3 Surrounding Land Uses

Surrounding land uses consist of a mixture of low and mid-rise buildings occupied by industrial, warehouse, office, and residential uses. Properties to the north are developed with live-work units, commercial, and industrial uses, and are in the M3-1-RIO Zone.[5] Properties to the south are developed with industrial and warehouse uses, and are in the M3-1-RIO Zone. Properties to the east are developed with multi-family residential, and industrial and warehouse uses, and are in the (Q)C2-1RIO and M3-1-RIO Zones.[6] Properties to the west are developed with low-rise commercial and industrial uses, and are zoned in the M3-1-RIO.

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

The Project is a new creative office campus that knits together uses spanning existing and proposed buildings on an approximately 273,930 square-foot (6.288 acre) site. A Lot Line Diagram is provided in Figure 3 on page 12, and a Conceptual Site Plan is provided in Figure 4 on page 13. As shown in Table 1 on page 14 and in Figure 4, the Project proposes a new 13-story (including mechanical penthouse), 450,599 square-foot mixed-use building featuring 435,100 square feet of office uses, 15,499 square-feet of ground floor retail and/or restaurant uses, and 1,264 automobile parking spaces in one at-grade, two above-grade, and four below-grade parking levels within Lot 1 of the Project Site, located at the southwest corner of the Project Site. The Project also includes approximately 74,018 square feet of outdoor areas, comprised of 20,418 square-feet of balconies and roof decks for the private use of office tenants and their guests, as well as 53,600 square-feet of shared outdoor areas in both deck areas and a covered ground floor area. In addition, the Applicant has requested for the existing public alley to be vacated to create a pedestrian paseo, improving pedestrian circulation throughout the Project Site. The ground floor paseo would provide pedestrian access to the proposed and existing uses, creating a unified development and introducing new public space that will be improved and programmed with ground floor retail and/or restaurant uses, seating areas, and landscaped areas of varying size and shaded areas. As part of the Project, the existing 25,798 square feet of warehouse and 9,940 square feet of office uses, along with associated surface parking, all located on Lot 1 on the southwest portion of the Project Site,would be demolished. The 244,795-square-foot Warner Music Group building (originally the Ford Factory building) on Lot 3 and 604-space vehicle parking garage on Lot 2 would remain with no change in use or alteration of the historic building.

The Applicant is requesting a General Plan Amendment to designate Lot 1's land use from Heavy Manufacturing to Regional Center Commercial and a Vesting Zone Change from the M3-1-RIO zone to C2-2-RIO zone. If approved, Lot 1's maximum floor area ratio (FAR) would be 6:1, permitting 661,800 square feet of development. Additionally, the Applicant is requesting a Floor Area Averaging Conditional Use Permit which would allow the remaining 211,201 square feet of floor area to be averaged across the entire Project Site as a Unified Development. Accordingly, the Project includes a Future Campus Expansion Phase which will encompass a potential expansion opportunity for additional office use,

[5] A project immediately to the north of the Project Site is in the process of requesting a General Plan Amendment, Zone Change, and Height District Change from "Heavy Manufacturing" to "Regional Center Commercial" as well as a corresponding zone change from M3-1-RIO to C2-2-RIO.

[6] A 347-unit, 36-story mixed-use development approximately 250-feet to the east of the Project Site was granted a General Plan Amendment and Zone Change, approved by City Planning Commission in April 2021

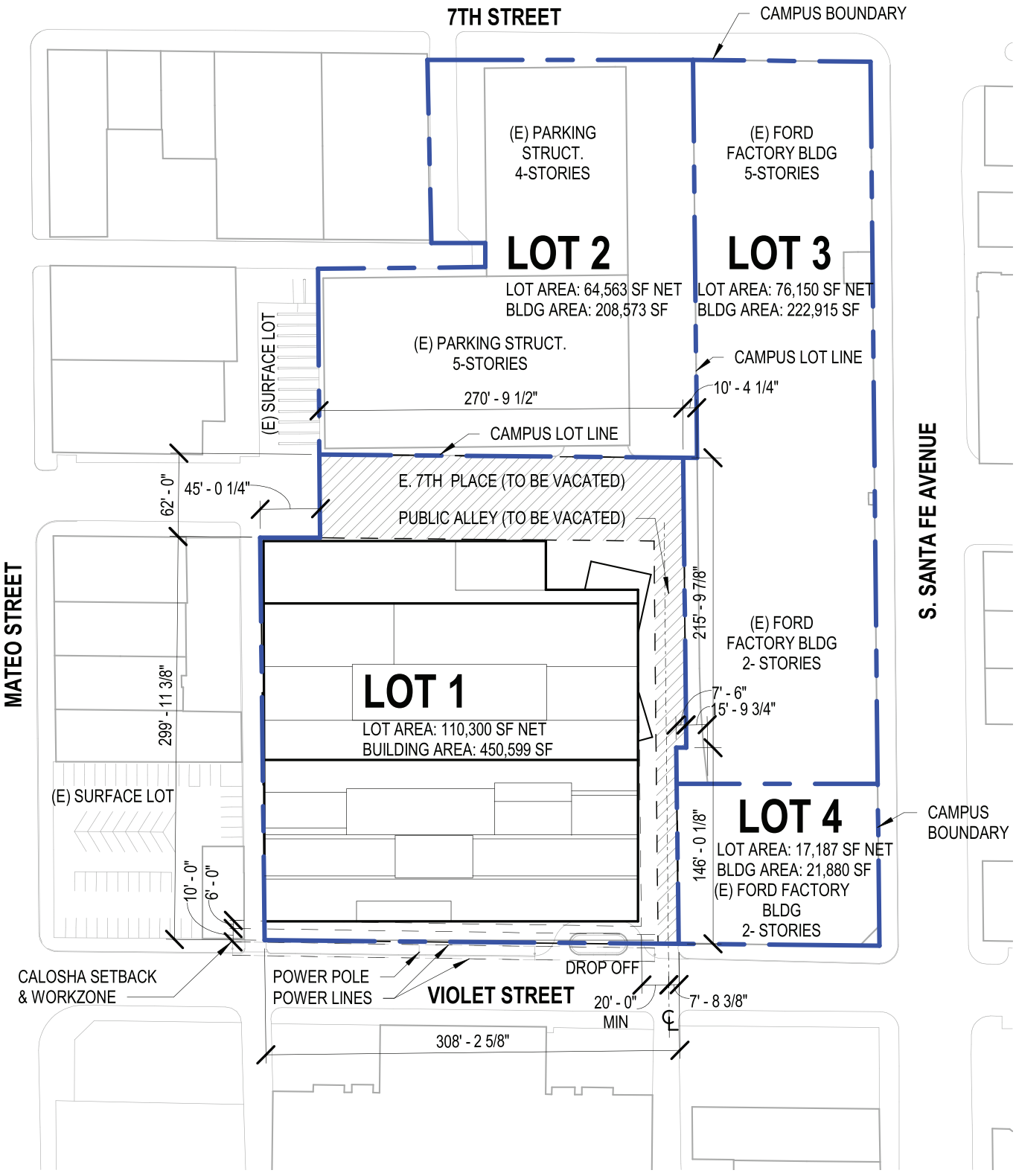

Figure 3
Lot Line Diagram

Source: Rios, 2021.

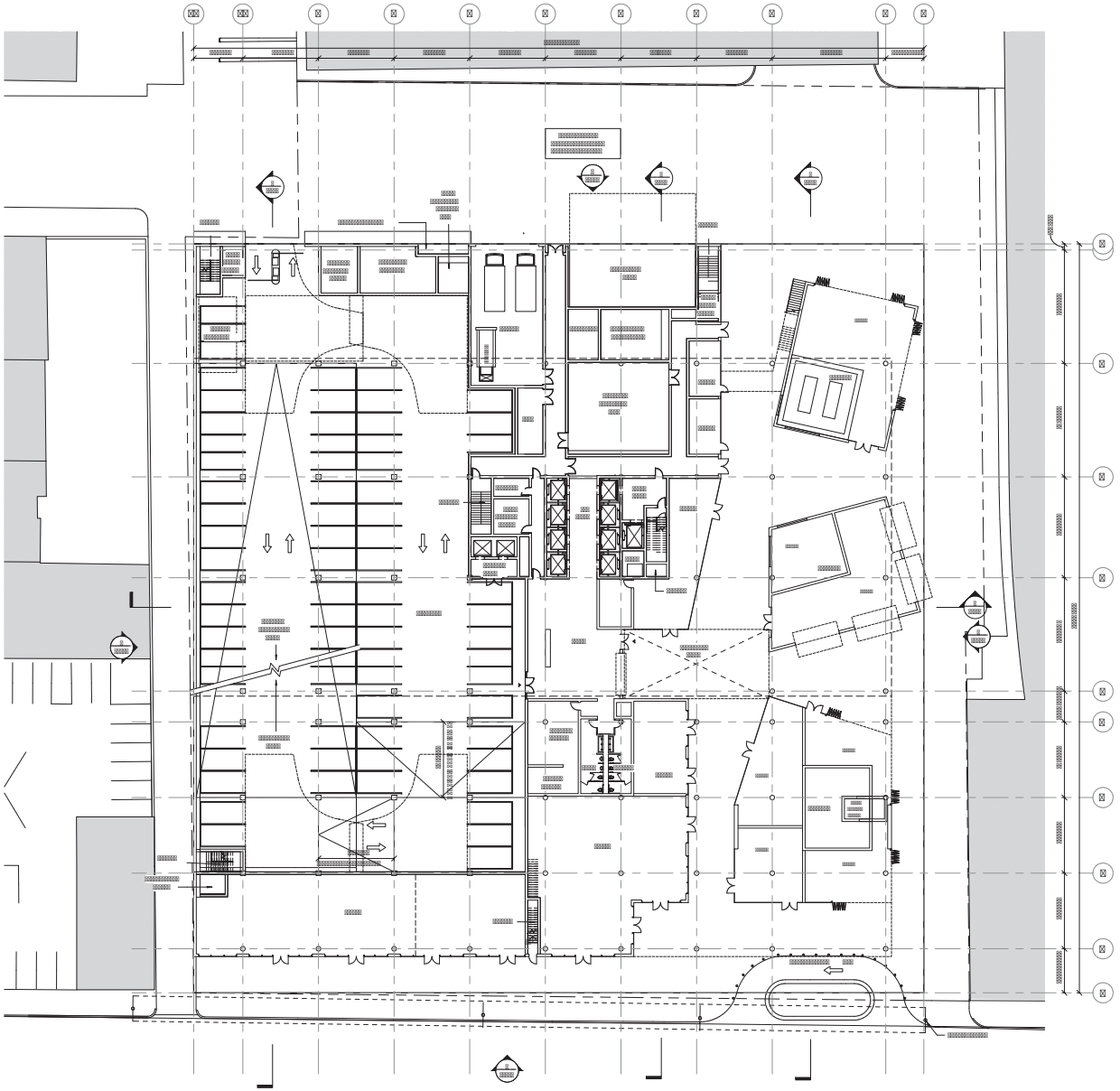

Figure 4
Conceptual Site Plan

Source: Rios Clementi Hale Studios, 2021.

Table 1
Summary of Existing and Proposed Floor Area[a]

Use	Existing	Proposed Demolition	Proposed Construction	New Floor Area	Total Floor Area
Retail/Restaurant	0 sf	0 sf	15,499 sf	15,499 sf	15,499 sf
Office (Project)	254,735 sf[b]	(9,940) sf	435,100 sf	425,160 sf[c]	679,895 sf
Office (Future Campus Expansion Phase)	21,880 sf	(21,880) sf	211,201 sf	189,321 sf[d]	211,201 sf
Warehouse	25,798 sf	(25,798) sf	0 sf	(25,798) sf	0 sf
Total	**302,413 sf**	**57,618 sf**	**661,800 sf**	**604,182 sf**	**906,595 sf**

sf = square feet

[a] *Square footage is calculated pursuant to the LAMC definition of floor area for the purpose of calculating FAR. LAMC Section 12.03 defines floor area as "[t]he area in square feet confined within the exterior walls of a building, but not including the area of the following: exterior walls, stairways, shafts, rooms housing building-operating equipment or machinery, parking areas with associated driveways and ramps, space for the landing and storage of helicopters, and basement storage areas.*

[b] *Includes the existing 244,795-square-foot Warner Music Group building and the 9,940-square-foot office use at 2045 E. Violet Street. The Warner Music Group building includes ancillary café uses, but these are not open to the public and are considered part of the office use.*

[c] *425,160 square feet reflects the net new floor area for the proposed office use (435,100 - 9,940 = 425,160).*

[d] *189,321 square feet reflects the net new floor area for the Future Campus Expansion Phase (211,201 – 21,880 = 189,321).*

Source: Hines, 2021.

consistent with the current M3-1-RIO zone to be developed within Lot 4 of the Project Site at the corner of Violet Street and Santa Fe Avenue. Construction of the Future Campus Expansion Phase would require the demolition of an existing 21,880 square foot warehouse building. For purposes of this analysis, this Future Campus Expansion Phase would be comprised of office uses, but this portion of the Project Site could be utilized for any uses consistent with the existing M3-1-RIO zone. The Future Campus Expansion Phase is therefore analyzed as 211,201 square feet of office uses throughout this Initial Study and subsequent EIR.

3.3.2 Design and Architecture

As illustrated in Figure 5 on page 15, the proposed office tower incorporates varying rooflines, a sloping high-rise tower, expansive elongated windows with nonreflective glass, and material breaks (i.e., glass fiber reinforced concrete [GFRC], different glass systems, and louvred fins) in the vertical façade. Along with new ground floor landscaped paseo, the proposed balconies (located on Levels 8 and 10) create breaks in the façade. All above ground parking levels would be fully screened. The proposed mixed-use building would complement the Warner Music Group building by promoting pedestrian activity in the area while also introducing new uses and a new office building that reflects a style consistent with new nearby development. The proposed 217-foot 6-inch-tall building includes commercial spaces at the ground floor, parking at floors two through three and office space at floors four through 12. The ground floor commercial spaces fronting Violet Street will be set back under upper parking levels, which are supported

Paseo

Aerial View

Northwest Terrace

7th Place

Figure 5
Proposed Renderings

Source: Rios Clementi Hale Studios, 2021.

by concrete columns at ground level. The ground floor commercial spaces will be clad in concrete and brick with large, aluminum framed windows and tenant signage on the south elevation. The ground floor also includes a new landscaped paseo, which promotes pedestrian activity at the street level and compliments existing nearby uses.

The three above-grade parking levels would be clad in concrete, while upper office levels would be clad in aluminum and non-reflective glass and screened with GFRC and vertical metal panels that are spaced to create tall, narrow openings. The office space on floors four through 12 are located on the northern half of the building, creating a massing that steps back and up from Violet street at the approximate midpoint of the structure. Multilevel balcony cutouts are irregularly located at four locations within the south elevation of the building. These cutouts help to break up the otherwise flat massing of the south elevation. The roof above floors three and 12 are designed in an irregular sawtooth shape when viewed from the east and west elevations. This design feature helps to further distinguish the building from surrounding structures, which are predominantly rectilinear in form. Mechanical equipment will be located on the roof level above office level 12.

3.3.3 Outdoor Areas and Landscaping

As shown in the Project's landscape plan, the Project would provide 74,018 square feet of outdoor areas and landscaping through the introduction of a 42,957 square-foot ground floor paseo and a total of 31,061 square feet comprised of 15,961 square feet of balconies located on levels 1–5, 8, and 8 and 15,100 square feet of roof decks located on the roof of levels 1, 4, 5, and 12. While the Project is not required to provide outdoor areas and/or landscaping, the proposed ground floor public paseo would improve pedestrian connectivity throughout the Project Site, while the outdoor decks and balconies would provide tenants with convenient access to the outdoors. Both the private and public deck areas are designed with a combination of landscape, hardscape, seating areas, and pavers. The covered ground floor areas are maintained with concrete pavers, planting areas, and seating. Additionally, the outdoor and landscape areas would unify the site by encouraging an active ground floor and providing a cohesive plant palette. This enhanced public realm creates a series of pedestrian pathways linking the campus both internally as a unified development and externally with the existing public realm. A total of 59 trees of various species will be planted throughout the Project Site, including six street trees would be provided along adjacent streets.

The Project would also enhance the public realm with streetscape improvements to create a cohesive visual identity for the Project Site and enhance the pedestrian experience with appropriate connectivity to the surrounding area. Along all street frontages, pedestrian access would be improved and allow for planting areas and six street trees. Plantings would include resilient, drought-tolerant native and adaptive tree, shrub, and groundcover species, including shade trees. Adjacent to the Violet Avenue sidewalk, pedestrian scale improvements including pavers, and planters would be provided to highlight the main entrance. This design is complemented with a landscaped vehicular drop-off and pick-up area.

3.3.4 Access, Circulation, and Parking

Vehicular access (ingress/egress) to the parking structure would be provided via East 7th Place which extends into the paseo. In addition, a rideshare drop-off area would be provided on Violet Avenue, along the southern border of the Project Site. Access to the loading dockwould be provided to the east of

parking entry/exit driveway. Pedestrian access to the buildings would be provided along multiple points throughout the Project Site.

The Project would include a parking structure with one at-grade, two above-grade, and four below-grade levels and provide a total of 1,264 vehicular parking spaces. In accordance with LAMC requirements, the Project would also provide 156 bicycle parking spaces, including 99 long-term spaces and 57 short-term spaces in bicycle parking facilities accessible from the at-grade parking level via the lobby. In addition, the Project would comply with City and State requirements for providing electric vehicle charging capabilities and electric vehicle charging stations within the vehicle parking areas.

3.3.5 Lighting and Signage

The Project would include low-level exterior lights along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage would be incorporated. All lighting would comply with current energy standards and regulations, as well as design requirements. Project lighting would be designed to provide efficient and effective on-site lighting while minimizing light spill-over from the Project Site, reducing sky-glow, and improving nighttime visibility through glare reduction. All exterior and interior lighting would meet high energy efficiency requirements utilizing light emitting diode (LED) or efficient fluorescent lighting technology. New street and pedestrian lighting within the public right-of-way would comply with applicable City regulations.

The Project is located in the River Improvement Overlay (RIO) and is subject to the exterior lighting regulations of LAMC Section 13.17 F.3. The exterior lighting regulations of the RIO are intended to help provide an aesthetically pleasing environment in the vicinity of the Los Angeles River. The Project would comply with the RIO, including its exterior lighting regulations. Specifically, all site and building mounted LED or efficient fluorescent lighting would be designed such that the lighting produces a maximum initial luminance value no greater than 0.20 horizontal and vertical foot candles at the site boundary, and no greater than 0.01 horizontal foot candles 15 feet beyond the site. No more than 5 percent of the total initial designed lumens would be emitted at an angle of 90 degrees or higher from nadir (straight down). No low pressure sodium, high pressure sodium, metal halide, quartz, incandescent greater than 60 watts, mercury vapor, or halogen fixtures are proposed.

Proposed signage would be designed to be aesthetically compatible with the proposed architecture of the Project and its surroundings. Proposed signage would include identity signage, building and tenant signage, and general ground level and way-finding pedestrian signage that would comply with LAMC signage regulations. The Project would not include signage with flashing or mechanical properties. Project signage would be illuminated via low-level, low-glare external lighting, internal halo lighting, or ambient light. Exterior lighting for signage would be directed onto signs to avoid creating off-site glare. Illumination used for Project signage would comply with light intensities set forth in the LAMC and as measured at the property line of the nearest residentially zoned property.

3.3.6 Sustainability Features

The Project's design is based on principles of smart growth and environmental sustainability, as demonstrated by its mixed-use configuration, emphasis on walkability, bike-friendly environment, and

proximity to public transit.[7] The Project would comply with the City of Los Angeles Green Building Code, CalGreen, and incorporate features to support and promote environmental sustainability including an energy-efficient building, a pedestrian- and bicycle-friendly site design, solar ready rooftops, electric vehicle charging, water conservation measures, and waste reduction measures, among others. The Project would also utilize sustainable planning and building strategies and would incorporate the use of environmentally sustainable materials where applicable.

3.3.7 Site Security

The Project would include numerous security features, which may include a closed-circuit camera system and keycard entry for the office uses and parking areas. The Project would also be designed such that entrances to and exits from buildings, open spaces around buildings, and pedestrian walkways would be open and in view of surrounding sites. In addition, buildings and walkways would be properly lit in order to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings. Parking areas would also be sufficiently lit to maximize visibility and reduce areas of concealment.

3.3.8 Anticipated Construction Schedule

Construction of the Project would commence with demolition of the existing buildings and surface parking areas to be removed. This phase would be followed by grading and excavation for the subterranean parking. The building foundation would then be laid, followed by building construction, paving/concrete installation, and landscape installation. Project construction is anticipated to begin in 2023 and be completed in 2026. It is estimated that approximately 144,000 cubic yards of export would be hauled from the Project Site.

3.4 REQUESTED PERMITS AND APPROVALS

The list below includes the anticipated requests for approval of the Project. The Environmental Impact Report 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:

- **Pursuant to City Charter Section 555 and Section 11.5.6 of the LAMC,** a General Plan Amendment to amend the Central City North Community Plan to re-designate Lot 1 from "Heavy Manufacturing" to "Regional Center Commercial."

- **Pursuant to Section 12.32 F and 12.32 Q of the LAMC,** a Vesting Zone and Height District Change from the M3-1-RIO Zone to the C2-2-RIO Zone for Lot 1 of the Project Site.

[7] The Southern California Association of Governments (SCAG) considers smart growth to be a range of development and conservation strategies that help protect the natural environment and make communities more attractive, economically stronger, and more socially diverse. A balance is sought between economically prosperous, socially equitable, and environmentally sustainable community development. SCAG, Connect SoCal Final Program EIR, May 2020, Section 3.11, Land Use and Planning, p. 3.11-3.

- **Pursuant to Section 12.24 U.14 of the LAMC,** a Vesting Conditional Use for a Major Development Project resulting in the creation of greater than 100,000 square-feet of non-warehouse, nonresidential floor area in the C2 Zone within the Project Site.

- **Pursuant to Section 12.24 W.19 of the LAMC,** a Vesting Conditional Use to allow Floor Area Ratio averaging across a Unified Development.

- **Pursuant to Section 12.27 of the LAMC,** a Zone Variance from Section 12.21 C.6 (b) of the LAMC to permit a loading zone to be provided with vehicular access from a public street.

- **Pursuant to Sections 16.05 of the LAMC**, Site Plan Review for a project resulting in more than 50,000 new square-feet of nonresidential floor area within the Project Site.

- **Pursuant to Sections 17.01, 17.10, 17.13, and 17.15 of the LAMC**, a Vesting Tentative Tract Map to permit the merger and resubdivision of a portion of 7th Place, Violet Street, Santa Fe Avenue, and the abutting public alley to permit the creation of four ground lots; maintenance of the existing 30-foot width of the abutting half right-of-way of Violet Street, maintenance of the existing 40-foot width of the abutting half right-of-way of Santa Fe Avenue; maintenance of the existing 40-foot width of the abutting half right-of-way of 7th Street, maintenance of the existing 7.5-foot width of the abutting half right-of-way of the alley located at the westerly property line, and the export of greater than 144,000 cubic yards of materials.

- **Other discretionary and ministerial permits and approvals that are or may be required,** including, but not limited to, temporary street closure permits, grading permits, excavation permits, haul route approval, street tree removal approval, foundation permits, and sign permits.

3.5 RESPONSIBLE PUBLIC AGENCIES

A Responsible Agency under CEQA is a public agency with some discretionary authority over a project or a portion of a project, but which has not been designated the Lead Agency (State CEQA Guidelines Section 15381). No responsible agencies have been identified for the Project.

4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

Senate Bill (SB) 743 [Public Resources Code (PRC) Section 21099(d)] sets forth new guidelines for evaluating project transportation impacts under CEQA, as follows: "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment." PRC Section 21099 defines a "transit priority area" as an area within 0.5 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." PRC 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." 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. PRC Section 21099 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. This state law supersedes the aesthetic impact thresholds in the 2006 L.A. CEQA Thresholds Guide, including those established for aesthetics, obstruction of views, shading, and nighttime illumination.

The related City of Los Angeles Department of City Planning Zoning Information (ZI) File ZI No. 2452 provides further instruction concerning the definition of transit priority projects and that "visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA."[8] However, ZI No. 2452 further states that "the law does not limit the ability of the City to regulate, or study aesthetic related impacts pursuant to other land use regulations found in the Los Angeles Municipal Code (LAMC) or the City's General Plan, including specific plans." Thus, pursuant to PRC Section 21099 and ZI No. 2452, impact findings related to views, scenic resources, visual character, shading, and light and glare, would not be required, unless standards related to these issues are set forth in the General Plan, the LAMC, and other adopted plans. In the latter case, plan or regulation consistency must be evaluated for determination of significance.

PRC Section 21099 applies to the Project. Specifically, pursuant to PRC Section 21099, the Project is an employment center project that would be located on an infill site within a TPA. The Project is considered an employment center project because the Project Site's M3-1-RIO zoning permits a wide variety of industrial, manufacturing, and storage uses, as well as office and commercial uses with a maximum FAR greater than 0.75. In addition, the Project Site is located on an infill site, as that term is defined in PRC Section 21099(a)(4), because the Project Site includes lots located within an urban area that has been previously developed. Lastly, the Project Site is located within a TPA, as that term is defined in PRC

[8] 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.

Section 21099(a)(7), because it is located within one-half mile of an existing "major transit stop." In particular, the Project Site is located within 0.5-mile of bus routes including the Metro Local Lines 18, 60, and 62. The City's Zone Information and Map Access System (ZIMAS) also confirms the Project Site's location within a TPA, as defined in the ZI No. 2452. Therefore, in accordance with PRC Section 21099(d)(1), the Project's aesthetic impacts shall not be considered significant impacts on the environment and therefore do not have to be evaluated under CEQA. The analysis in this Initial Study is for informational purposes only and not for determining whether the Project will result in significant impacts on the environment. Any aesthetic impact analysis in this Initial Study is included to discuss what aesthetic impacts could occur from the Project if PRC Section 21099(d) was not in effect. As such, nothing in the aesthetic impact discussion in this Initial Study shall trigger the need for any CEQA findings, CEQA analysis, or CEQA mitigation measures.

	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?	☐	☐	☒	☐

a. Would the project have a substantial adverse effect on a scenic vista?

Less Than Significant Impact. A scenic vista is a panoramic view of a valued visual resource.[9] Panoramic views or vistas provide visual access to a large geographic area, for which the field of view can be wide and extend into the distance. Panoramic views are typically associated with vantage points looking out over a section of urban or natural areas that provide a geographic orientation not commonly available. Examples of panoramic views include an urban skyline, valley, mountain range, the ocean, or other water bodies. Focal views are also relevant when considering this question from Appendix G of the CEQA Guidelines. Examples of focal views include natural landforms, public art/signs, individual buildings, and specific, important trees.

[9] City of Los Angeles, 2006 L.A. CEQA Thresholds Guide, page A.2-1

With regard to panoramic views, valued visual resources in the vicinity of the Project Site include the Los Angeles River, the downtown Los Angeles skyline, and structures that are considered historic resources. With regard to focal views, valued visual resources in the vicinity of the Project Site include the Warner Music Group building within the Project Site and the historic industrial buildings at 2039 East Bay Street (one block south of the site) and 2140 East 7th Place (one block northeast of the site). The tower portion of the Warner Music Group building is 78 feet 8 inches in height and the annex is 41 feet 8 inches in height.

Views of the Los Angles skyline, the Los Angeles River, and the historic industrial buildings at 2039 East Bay Street and 2140 East 7th Place are not visible from the site due to the distance of these visual resources and intervening development, including mid-rise buildings. Therefore, development of the Project would not block existing views of these visual resources across the Project Site.

Views of the Warner Music Group building would be maintained through the conversion of the existing alley into a ground floor public paseo. Additionally, views of the Warner Music Group building from across the Project Site are not currently available due to intervening development, including the large, 2-story warehouse building at 2020 East 7th Place. Therefore, development of the Project would not block existing views of these visual resources across the Project Site. Furthermore, views of the Warner Music Group building are best experienced from Violet Street and South Santa Fe Avenue, upon which the Project would have no impact because the Project is set back along the Violet Street frontage.

Overall, as the area is fully developed and highly urbanized, the Project would not have a substantial adverse effect on a publicly available scenic vista. Moreover, pursuant to SB 743 and ZI No. 2452, the Project's aesthetics impact would not be considered a significant impact on the environment. Therefore, no further evaluation of this topic in an EIR is required.

b. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?[10]

Less Than Significant Impact. The Project Site is not located along a state scenic highway. The nearest officially eligible state scenic highway is along the Foothill Freeway (I-210), approximately 8.5 miles northeast of the Project Site.[11] Therefore, the Project would not substantially damage scenic resources within a state scenic highway as no scenic highways are located adjacent to the Project Site. Moreover, pursuant to SB 743 and ZI No. 2452, the Project's aesthetics impact would not be considered a significant impact on the environment. Therefore, no further evaluation of this topic in an EIR is required.

c. In non-urbanized areas, would the project 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?

---

[10] While the Project Site is not located along a state scenic highway, as discussed in Response to Checklist Question V.a below, it does include a historic resource on-site. Potential aesthetic impacts to historic resources will be analyzed in the Draft EIR as part of the evaluation of historic resources.

[11] California Department of Transportation, Scenic Highways, https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways accessed April 15, 2021.

Less Than Significant Impact. The Project is located in an urbanized area. As such, this analysis focuses on whether the Project would conflict with applicable zoning and other regulations governing scenic quality.

With regard to zoning, as discussed in Section 3, Project Description, of this Initial Study, the Project Site is located within the Central City North Community Plan area and has a Heavy Manufacturing General Plan Land Use designation with the corresponding zone of M3-1-RIO (Heavy Manufacturing, Height District 1, River Implementation Overlay District). This zone permits a wide variety of industrial, manufacturing, and storage uses, as well as office and commercial uses. Height District 1 allows a 1.5:1 FAR with no height or story limit. The RIO designation is for the City's River Implementation Overlay (RIO) district, which is designed to provide for preservation of tributaries and rivers in the City of Los Angeles by promoting river identity, supporting local species, and convenient access, among many other aspects.

Lot 1 of the Project Site is currently occupied with approximately 25,798 square feet of warehouse uses and 9,940 square feet of office uses and associated surface parking which would be removed as part of the Project and Lot 4 of the Project Site is currently occupied with a 21,880 square foot warehouse building that would be removed as part of the Future Campus Expansion Phase. The remaining portion of the Project Site, Lots 2 and 3, are developed with the 244,795 square-foot Warner Music Group building and a parking garage which would be retained with no change in use. The Project includes the development of a new 13-story, 450,599 square-foot building featuring 435,100 square feet of office uses, 15,499 square-feet of ground floor retail and/or restaurant uses, and 1,264 automobile parking spaces in one at-grade, two above-grade, and four below-grade parking levels within the Lot 1. The Future Campus Expansion Phase includes development of 211,201 square feet of office uses within Lot 4. The Project Site is zoned M3-1-RIO. The Project and Future Campus Expansion Phase uses would be consistent with the types of uses permitted in the M3 Zone, as described above. Height District 1 does not establish a height maximum or a maximum number of stories, but rather permits a maximum FAR of up to 1.5 times the buildable area of the lot. Upon completion, the Project would result in a net increase in floor area of 626,062 square feet including the Future Campus Expansion Phase, and a FAR of 6:1 within Lots 1 and 4. In order to permit a FAR of 6:1, the Project has requested a Vesting Zone and Height District Change from the M3-1-RIO Zone to the C2-2-RIO Zone and a General Plan Amendment from Heavy Manufacturing to Regional Center Commercial on Lots 1 and 4.

With regard to the City's regulations governing scenic quality, local land use plans applicable to the Project Site also include policies governing scenic quality, including the Citywide General Plan Framework Element (Framework Element), the Central City North Community Plan, the Central Industrial Redevelopment Plan, and the Citywide Design Guidelines. The Project's lack of conflict with the general intent of these plans is briefly discussed below.

City General Plan Framework Element

The Framework Element provides direction regarding the City's vision for future development in the City and includes an Urban Form and Neighborhood Design chapter to guide the design of future development. One of the key objectives of the Urban Form and Neighborhood Design Chapter is to enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm (Objective 5.5). The Project would enhance the built environment in the surrounding neighborhood and upgrade the quality of development by replacing existing warehouse and

office buildings with an office tower incorporating varying rooflines, a sloping high-rise tower, expansive elongated windows with nonreflective glass, and material breaks (i.e., GFRC, different glass systems, and louvred fins) in the vertical façade. Additionally, the outdoor and landscape areas would unify the site by encouraging an active ground floor and providing a cohesive plant palette. The Project would also include a ground floor, publicly accessible paseo that would provide pedestrian access to the existing and proposed uses, creating a unified development and introducing new public space that will be improved and programmed with ground floor retail and/or restaurant uses, seating areas, and landscaped areas of varying size and shaded areas. The proposed mixed-use building and the Future Campus Expansion Phase would complement the Warner Music Group building by promoting economic activity in the area while also introducing a new structure compatible with the campus and the surrounding area. The Project would also include six new street trees adjacent to the Project Site to enhance pedestrian-level amenities.

Overall, the Project would be generally consistent with the applicable objective that supports the goals set forth in the Framework Element's Urban Form and Neighborhood Design Chapter and, therefore, would not conflict with the Framework Element policies regarding scenic quality.

Central City North Community Plan

As it relates to scenic quality, the Central City North Community Plan includes the following policies applicable to the Project:

- Install utilities underground.
- Require that projects be designed and developed to achieve a high level of quality, distinctive character, and compatibility with existing uses and development.

As part of the Project, new utility connections would be placed underground consistent with the Central City North Community Plan. In addition, the office tower component incorporates varying rooflines, a sloping high-rise tower, expansive elongated windows with nonreflective glass, and material breaks (i.e., GFRC, different glass systems, and louvred fins) in the vertical façade. Additionally, the outdoor and landscape areas would unify the site by encouraging an active ground floor and providing a cohesive plant palette. The Project would also include a ground floor, publicly accessible paseo that would provide pedestrian access to the existing and proposed uses, creating a unified development and introducing new public space that will be improved and programmed with ground floor retail and/or restaurant uses, seating areas, and landscaped areas of varying size and shaded areas. The proposed mixed-use building would complement the Warner Music Group building by promoting economic activity in the area while also introducing a new structure compatible with remainder of the Project Site and the surrounding area. Overall, relative to the surrounding development, the Project design would complement the varying design elements of the commercial uses adjacent to the Project Site.

Based on the above, the Project would not conflict with the Central City North Community Plan objective and policies related to scenic quality.

Central Industrial Redevelopment Plan

Section 105 of the Central Industrial Redevelopment Plan sets forth the goals of the Redevelopment Plan. The Central Industrial Redevelopment Plan provides the following goal and objective related to scenic quality:

> *Goal: A Project Area that projects a positive image to business operators, residents, employees, visitors and investors.*
>
> Objective: Developments that are appropriately landscaped to provide an aesthetically pleasing environment.

As previously discussed above, the Project would enhance the built environment in the surrounding neighborhood and upgrade the quality of development over existing Project Site improvements. Specifically, the office tower component of this Project incorporates varying rooflines, a sloping high-rise tower, expansive elongated windows with nonreflective glass, and material breaks (i.e., GFRC, different glass systems, and louvred fins) in the vertical façade. Additionally, the outdoor and landscape areas would unify the site by encouraging an active ground floor and providing a cohesive plant palette. The Project would also include a ground floor, publicly accessible paseo that would provide pedestrian access to the existing and proposed uses, creating a unified development and introducing new public space that will be improved and programmed with ground floor retail and/or restaurant uses, seating areas, and landscaped areas of varying size and shaded areas. The proposed mixed-use building would complement the Warner Music Group building by promoting economic activity in the area while also introducing a new structure compatible with the remainder of the Project Site and the surrounding area. The Project would also enhance the streetscape by installing landscaping, including six new street trees. In addition, the Project would provide a ground floor public pedestrian paseo within the Project Site, improving pedestrian connectivity throughout the site. Landscape improvements include trees with overhead lighting and flexible seating areas that include benches, seat walls, and moveable furnishings. Overall, the Project would support the Redevelopment Plan's goal to create a pleasing environment and, therefore, would not conflict with the Central Industrial Redevelopment Plan goal and objective related to scenic quality.

Citywide Design Guidelines

The Citywide Design Guidelines, adopted October 24, 2019, establishes 10 guidelines to carry out the common design objectives that maintain neighborhood form and character while promoting quality design and creative infill development solutions. Although each of the Citywide Design Guidelines should be considered in a project, not all will be appropriate in every case. The Project would not conflict with the Citywide Design Guidelines, as discussed below.

Guideline 1: Promote a safe, comfortable and accessible pedestrian experience for all

The Project would improve the pedestrian experience through the introduction of new ground floor retail/restaurant uses which would help to activate the Project Site and surrounding area. Further, the Project would create an inviting pedestrian environment by providing street trees along Violet Street and various landscaped and seating areas throughout the new ground floor public paseo. The commercial storefronts, outdoor seating, and ground floor public paseo will activate the existing street frontage and provide new pedestrian connections through the site. The Project would include planted areas along the

sidewalk and throughout the new paseo creating an immersive space with shaded areas, native plants, and built-in planters with seating further activating the streetscape and improving the pedestrian environment. The Project would include low-level exterior lights along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage would be incorporated. Building security will also enhance local pedestrian safety. These Project elements would promote a safe, comfortable, and accessible pedestrian experience for all.

Guideline 2: Carefully incorporate vehicular access such that it does not degrade the pedestrian experience

The Project parking garage includes one driveway for office tenants and retail/restaurant patrons, one loading dock, and one rideshare drop-off area. The proposed driveways would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access and would incorporate pedestrian warning systems, as appropriate. In order to minimize the impact on pedestrian enhancements along Violet St and the paseo, the garage and loading entries are accessible via 7th Place. The Project design would also maximize the use of existing curb cuts to the extent feasible.

Guideline 3: Design projects to actively engage with streets and public space and maintain human scale

The Project would activate the ground floor along Violet Street, the primary street frontage by introducing new retail and/or restaurant uses and outdoor areas, as well as a coherent, uniform, architectural design featuring pedestrian oriented signage. The Project would include planted areas along the sidewalks adjacent to the Project Site, further activating the streetscape and improving the pedestrian environment. Special consideration has been given to the ground level to introduce human-scaled architectural features including the paseo with small retail pavilions, ample outdoor seating, and abundant landscaping. In addition, the tower portion of the development has been set back from the street frontage to keep the building mass consistent with the surrounding urban context. Overall, the Project design would actively engage with the surrounding streets and public space and maintain human scale.

Guideline 4: Organize and shape projects to recognize and respect surrounding context

The Project Site is within the Central City North Community Plan Area. The area surrounding the Project Site consists of a mixture of low and mid-rise buildings with no consistent building typology occupied by industrial, warehouse, office, and residential uses. Properties to the north are developed with live-work units, commercial, and industrial uses; properties to the south are developed with industrial and warehouse uses; properties to the east are developed with multi-family residential, and industrial and warehouse uses; and properties to the west are developed with low-rise commercial and industrial uses. The Project would be designed in a contemporary architectural style that includes elements which mirror r the general urban characteristics of the surrounding neighborhood. The design draws on several features of the prevailing contextual architecture: it utilizes the warehouse typology with large floor plates and tall ceiling heights with clerestory skylights – referencing a sawtooth roofline that is a distinctive to the arts district. Light wells, pockets of landscaping, and industrial materials of concrete, brick, and metal are a common thread throughout the design. Along with new landscaping, the balconies create breaks in the building's massing and allow for ample opportunities to add foliage/natural colors to above-grade levels. The proposed mixed-use building would complement the Warner Music Group building by promoting

economic activity in the area while also introducing a new structure compatible with the campus and the surrounding area.

Guideline 5: Express a clear and coherent architectural idea

Set in the Arts District, the proposed building draws from the contextual industrial form while adapting to newly developed uses and bringing an innovative new presence to Violet St. The proposed 217-foot 6-inch-tall building includes commercial spaces at the ground floor, parking at floors two through three and office space at floors four through 12. The ground floor commercial spaces fronting Violet Street will be set back under upper parking levels, which are supported by concrete columns at ground level. The ground floor commercial spaces will be clad in concrete and brick with large, aluminum framed windows and tenant signage on the south elevation. The ground floor also includes a new landscaped paseo, which promotes pedestrian activity at the street level and compliments existing nearby uses. The three above-grade parking levels would be clad in concrete, while upper office levels would be clad in aluminum and non-reflective glass and screened with GFRC and vertical metal panels that are spaced to create tall, narrow openings. The office space on floors four through 12 are located on the northern half of the building, creating a massing that steps back and up from Violet street at the approximate midpoint of the structure. Multilevel balcony cutouts are irregularly located at four locations within the south elevation of the building. These cutouts help to break up the otherwise flat massing of the south elevation. The roof above floors three and 12 are designed in an irregular sawtooth shape when viewed from the east and west elevations. This design feature helps to further distinguish the building from surrounding structures, which are predominantly rectilinear in form. Mechanical equipment will be located on the roof level above office level 12.

Guideline 6: Provide amenities that support community building and provide an inviting, comfortable user experience

As previously discussed, the Project would enhance the adjacent streetscape by introducing ground floor retail and/or restaurant uses and outdoor areas. The Project would also include planted areas along the sidewalk, further activating the streetscape and improving the pedestrian environment. The Project would also include a ground floor, publicly accessible paseo connecting existing and proposed uses. In addition, the Project would include low-level exterior lights adjacent to the buildings and along pathways that would serve to enhance the safety of pedestrians at night.

Guideline 7: Carefully arrange design elements and uses to protect site users

The Project would develop one commercial building that would include office uses and ground floor retail and/or restaurant uses. The proposed uses would be located along Violet Street and the pedestrian paseo would be located along the eastern border and along the northern portion of the Project Site, along a less active street. This arrangement of buildings and uses would ensure that pedestrian activity remains throughout the entire Project Site. In addition, internal to the Project Site, all driveways would be designed in accordance with all applicable LADOT regulations which would ensure pedestrian safety . The Project would also include lighting of building entries and walkways to provide for pedestrian orientation and to clearly identify a secure route between parking areas and points of entry into the commercial buildings.

Guideline 8: Protect the site's natural resources and features

The Project Site is located in an urbanized area and is currently developed with warehouse and office uses and surface parking. There are no natural resources or features on the Project Site. Landscaping within the Project Site and along adjacent streets is limited to ornamental shrubs and trees. As discussed in greater detail below and in the Tree Report included as Appendix IS-A of this Initial Study, the Project Site currently includes 28 on-site trees and 22 street trees. Six on-site trees and five street trees within the Lots 1 and 4 would be removed as part of the Project. However, these trees would be replaced in accordance with City requirements. No trees on the remainder of the Project Site would be affected by the Project.

Guideline 9: Configure the site layout, building massing and orientation to lower energy demand and increase the comfort and well-being of users

The site configuration, building massing and orientation employ passive design strategies to reduce the energy demand and create a more comfortable environment for users. The design of the open ground plane and pedestrian-friendly paseo uses the building to create cooler shaded breezeways with daylight wells and provides planted seating areas, gardens, and public art. The tower's lower sawtooth roof and light wells with garden terraces are oriented to reduce solar heat gain while maximizing daylight through clerestory skylights and provide close access to outdoor areas and natural ventilation throughout. Access to outdoor space is provided throughout the tower. The upper tower is situated along an east-west axis for optimal solar orientation. The design reduces solar exposure and heat gain with vertical louvers[12] on the east and west facades and with reduced areas of glazing to the south. Designed to simultaneously reduce heat and glare while allowing in copious natural daylight, the building enhances the comfort and well-being of users while significantly reducing the energy load on the building.

Guideline 10: Enhance green features to increase opportunities to capture stormwater and promote habitat

The Project would manage stormwater through an infiltration system. Stormwater would be directed or pretreatment prior to infiltration by means of drywells.

Conclusion

In summary, for all the foregoing reasons, the Project would not conflict with applicable zoning and other regulations governing scenic quality. Moreover, pursuant to SB 743 and ZI No. 2452, the Project's aesthetics impact would not be considered a significant impact on the environment. Therefore, no further evaluation of this topic in an EIR is required.

d. Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less Than Significant Impact. As discussed in the *L.A. CEQA Thresholds Guide*, new light sources introduced by a project may increase ambient nighttime illumination levels. Additionally, nighttime

[12] In building design, louvres are parallel, blades, slats, laths, slips of glass, wood, or other material designed to regulate airflow or light penetration.

spillover of light onto adjacent properties has the potential to interfere with certain functions, including vision, sleep, privacy, and general enjoyment of the natural nighttime condition. The significance of the impact depends on the type of use affected, proximity to the affected use, the intensity of the light source, and the existing ambient light environment. Uses considered sensitive to nighttime light include, but are not limited to, residential, some commercial and institutional uses, and natural areas. The Project's potential impacts with respect to new sources of light and glare are discussed below.

Construction

While the majority of Project construction would occur during daylight hours, there is a potential that construction could occur in the evening hours and require the use of artificial lighting, particularly during the winter season when daylight is no longer sufficient earlier in the day.[13] Outdoor lighting sources, such as floodlights, spot lights, and/or headlights associated with construction equipment and hauling trucks, typically accompany nighttime construction activities. To the extent evening construction includes artificial light sources, such use would be temporary and would cease upon completion of Project construction. Furthermore, construction-related illumination would be used for safety and security purposes only, in compliance with LAMC light intensity requirements.[14] Construction lighting, while potentially bright, would be focused on the particular area undergoing work.

Daytime glare could potentially occur during construction activities if reflective construction materials were positioned in highly visible locations where the reflection of sunlight could occur. However, any glare would be highly transitory and short-term, given the movement of construction equipment and materials within the construction area, and the temporary nature of construction activities. In addition, large, flat surfaces that are generally required to generate substantial glare are typically not an element of construction activities. Furthermore, temporary construction fencing would be placed along the periphery of the Project Site to screen construction activity from view at the street level from off-site locations. Therefore, there would be a negligible potential for daytime or nighttime glare associated with construction activities to occur.

Based on the above, light and glare associated with temporary Project construction would not substantially alter the character of off-site areas surrounding the Project Site or adversely impact day or nighttime views in the area. Moreover, pursuant to SB 743 and ZI No. 2452, the Project's aesthetics impacts would not be considered a significant impact on the environment. Therefore, no further evaluation of this topic in an EIR is required.

Operation

The Project would replace the existing buildings and associated surface parking areas on a portion of the Project Site with a new 13-story commercial building, which would increase light and glare levels emanating from the Project Site. The Project would include low-level exterior lights along pathways for

---

[13] All construction activity would be consistent with City regulations which include permitted construction/demolition hours of 7 A.M. to 9 P.M. Monday through Friday and 8 A.M. to 6 P.M. on Saturdays and national holidays. No construction is permitted on Sundays.

[14] LAMC Chapter 9, Article 3, Section 93.0117 provides that, no exterior light source may cause more than two foot-candles (21.5 1x) of light intensity or generate direct glare onto exterior glazed windows or glass doors; elevated porch, deck, or balcony; or any ground surface intended for uses such as recreation, barbecue or lawn areas or any property containing a residential unit or units.

security and wayfinding purposes. In addition, low-level lighting to accent signage would be incorporated. All lighting would comply with current energy standards and regulations, as well as design requirements. Project lighting would be designed to provide efficient and effective on-site lighting while minimizing light spill-over from the Project Site, reducing sky-glow, and improving nighttime visibility through glare reduction. The Project would also not include signage with flashing or mechanical properties. Project signage would be illuminated via low-level, low-glare external lighting, internal halo lighting, or ambient light. Exterior lighting for signage would be directed onto signs to avoid creating off site glare. Illumination used for Project signage would comply with light intensities set forth in the LAMC and as measured at the property line of the nearest residentially zoned property. New street and pedestrian lighting within the public right-of-way would comply with applicable City regulations.

Daytime glare can result from sunlight reflecting from a shiny surface that would interfere with the performance of an off-site activity, such as the operation of a motor vehicle. Reflective surfaces can be associated with window glass and polished surfaces, such as metallic trim. In general, sun reflection that has the greatest potential to interfere with driving occurs from the lower stories of a structure. Sun reflection from the Project would occur during periods in which the sun is low on the horizon and when the point of reflection within the Project Site is in front of the driver, in the direction of travel. The Project would feature a variety of surface materials, including glass, concrete, timber, and metal. As part of the Project, glass used in building façades would be non-reflective, thereby minimizing glare from reflected sunlight.

Nighttime glare could result from proposed Project signage. Project signage would be illuminated via low-level, low-glare external lighting, internal halo lighting, or ambient light. Exterior lighting for signage would be directed onto signs to avoid creating off-site glare. Illumination used for Project signage would comply with light intensities set forth in the LAMC and as measured at the property line of the nearest residentially zoned property. Thus, nighttime glare would not result in a substantial adverse impact.

Based on the above, with adherence to regulatory requirements, lighting associated with Project operation would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Moreover, pursuant to SB 743 and ZI No. 2452, the Project's aesthetic impact would not be considered a significant impact on the environment. Therefore, no further evaluation of this topic in an EIR is 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 Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest 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. Would the project 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. As discussed in Section 3, Project Description, of this Initial Study, the Project Site is currently developed with warehouse and office uses, surface parking, and a parking structure. No agricultural uses or operations occur on-site or in the vicinity of the Project Site. The Project Site and surrounding area are not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency Department of Conservation.[15] As such, the Project would not convert farmland to a non-agricultural use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

[15] City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5166014001, 5166014003, and 5166014012, http://zimas.lacity.org/, accessed April 15, 2021.

No Impact. The Project Site is zoned as M3-1-RIO (Heavy Manufacturing, Height District 1, River Implementation Overlay District). The Project Site is not zoned for agricultural use. Furthermore, no agricultural zoning is present in the surrounding area. The Project Site and surrounding area are also not enrolled under a Williamson Act Contract.[16] Therefore, the Project would not conflict with any existing zoning for agricultural uses or a Williamson Act Contract. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. As previously discussed, the Project Site is located in an urbanized area and is currently developed with warehouse and office uses, surface parking, and a parking structure. The Project Site does not include any forest land or timberland. In addition, the Project Site is currently zoned M3-1-RIO which permits a wide variety of industrial, manufacturing, and storage uses, as well as office and commercial uses, and is not zoned and/or used as forest land.[17] Therefore, the Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland as defined by the Public Resources and Government Codes. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

d. Would the project result in the loss of forest land or conversion of forest land to non-forest use?

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

e. Would the project 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. As discussed above, the Project Site is located in an urbanized area of the City and does not include farmland or forest land. The Project Site and surrounding area are also not mapped as farmland or forest land, are not zoned for farmland/agricultural use or forest land, and do not contain any agricultural or forest uses.[18] As such, the Project would not result in the conversion of farmland to non-agricultural use or in the conversion of forest land to non-forest use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

---

16 City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5166014001, 5166014003, and 5166014012, http://zimas.lacity.org/, accessed April 15, 2021.

17 City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5166014001, 5166014003, and 5166014012, http://zimas.lacity.org/, accessed April 15, 2021.

18 City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5166014001, 5166014003, and 5166014012, http://zimas.lacity.org/, accessed April 15, 2021.

III. AIR QUALITY

Where available, the significance criteria established by the South Coast Air Quality Management District (SCAQMD) 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. Would the project conflict with or obstruct implementation of the applicable air quality plan?

Potentially Significant Impact. The Project Site is located within the 6,700-square-mile South Coast Air Basin. Within the South Coast Air Basin, the South Coast Air Quality Management District (SCAQMD) is required, pursuant to the federal Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in non-attainment (i.e., ozone, particulate matter less than 2.5 microns in size [$PM_{2.5}$], and lead[19]). SCAQMD's 2016 Air Quality Management Plan (AQMP) contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG). SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment.[20] With regard to future growth, SCAG has prepared their Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which provides population, housing, and employment projections for cities under its jurisdiction. The growth projections in the RTP/SCS are based on growth projections in local general plans for jurisdictions in SCAG's planning area. Construction and operation of the Project may result in an increase in stationary and mobile source air emissions. As a result, development of the Project, including the Future Campus Expansion Phase, could have a potential adverse effect on SCAQMD's implementation of the AQMP. Therefore, the EIR will provide further analysis of the Project's potential conflicts with the AQMP.

---

19 Partial Nonattainment designation for lead for the Los Angeles County portion of the South Coast Air Basin only.

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

b. Would the project 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?

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

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. As discussed above, the Project could result in increased short- and long-term air pollutant emissions from the Project Site during construction (short-term) and operation (long-term). Sensitive receptors located in the vicinity of the Project Site include residential and school uses. Therefore, the Project, including the Future Campus Expansion Phase, could expose sensitive receptors to additional pollutant concentrations and the EIR will provide further analysis of the Project's potential to result in substantial adverse impacts to sensitive receptors.

d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact. No objectionable odors are anticipated as a result of either construction or operation of the Project. Specifically, construction of the Project would involve the use of conventional building materials typical of construction projects of similar type and size. Any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people. With respect to Project operation, according to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. Neither the Project nor the Future Campus Expansion Phase proposes these uses and consist of commercial office and retail and/or restaurant uses. On-site trash receptacles would also be contained, located, and maintained in a manner that promotes odor control, and would not result in substantially adverse odor impacts.

In addition, the construction and operation of the Project and Future Campus Expansion Phase would also comply with SCAQMD Rules 401, 402, and 403, regarding visible emissions violations.[21] In particular, Rule 402 provides that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or

[21] SCAQMD, Visible Emissions, Public Nuisance, and Fugitive Dust, www.aqmd.gov/home/regulations/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust, accessed April 15, 2021.

safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.[22]

Based on the above, the Project would not result in other emissions such as those leading to odors. Impacts during construction and operation of the Project would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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

[22] SCAQMD, Rule 402, Nuisance, adopted May 7, 1976.

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 Wildlife or U.S. Fish and Wildlife Service?

No Impact. The Project Site is located in an urbanized area and is currently developed with warehouse and office uses, surface parking and a parking structure. Landscaping within the Project Site is limited to common ornamental trees, grasses, and shrubs. Due to the urbanized and disturbed nature of the Project Site and the surrounding areas, and lack of large expanses of open space areas, species likely to occur on-site are limited to small terrestrial and avian species typically found in urbanized developed settings. Based on the lack of habitat on the Project Site, it is unlikely any special status species listed by the California Department of Fish and Wildlife (CDFW)[23] or by the U.S. Fish and Wildlife Service (USFWS)[24] would be present on-site. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area as defined by the City.[25] Therefore, the Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the CDFW or USFWS. No impact would occur, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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 Wildlife or U.S. Fish and Wildlife Service?

No Impact. The Project Site is located in an urbanized area and is currently developed with warehouse and office uses, surface parking and a parking structure. No riparian or other sensitive natural community exists on the Project Site or in the surrounding area.[26,27] Furthermore, the Project Site and surroundings are not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City or County of Los Angeles.[28,29] In addition, there are no other sensitive natural communities identified by the CDFW or the USFWS.[30,31,32] Therefore, the Project would not have a substantial adverse

---

23 California Department of Fish and Wildlife, California Natural Diversity Database, Special Animals List, April 2021.

24 United States Fish and Wildlife Service, ECOS Environmental Conservation Online System, Listed species believed to or known to occur in California, https://ecos.fws.gov/ecp/report/species-listings-by-state?stateAbbrev=CA&stateName=California&statusCategory=Listed, accessed March 12, 2021.

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

26 California Department of Fish and Wildlife, Biogeographic Information and Observation System (BIOS), https://apps.wildlife.ca.gov/bios/, accessed March 15, 2021.

27 United States Fish and Wildlife Service, National Wetlands Inventory, www.fws.gov/wetlands/data/Mapper.html, accessed March 15, 2021.

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

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

30 California Department of Fish and Wildlife, Biogeographic Information and Observation System (BIOS), https://apps.wildlife.ca.gov/bios/, accessed March 15, 2021.

31 California Department of Fish and Wildlife, CDFW Lands, www.wildlife.ca.gov/Lands, accessed March 15, 2021.

32 U.S. Fish and Wildlife Service, National Wetlands Inventory, www.fws.gov/wetlands/index.html, accessed April 15, 2021.

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

c. 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. The Project Site is located in an urbanized area and is currently developed with warehouse and office uses, surface parking, and a parking structure. No water bodies or state or federally protected wetlands exist on the Project Site or in the immediate vicinity.[33] Although sections of the Los Angeles River, which is located 0.2 mile east of the Project Site, are federally protected wetlands, such as near Elysian Park to the north and between Carson and Lakewood several miles to the south, the section near the Project Site is not, as it has been lined with concrete (refer to Threshold X.e below for further discussion of the Los Angeles River watershed). As such, the Project would not have an adverse effect on state or federally protected wetlands. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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. As described above, the Project Site is located in an urbanized area and is currently occupied by warehouse and office uses, surface parking, and a parking structure. The Project Site currently contains ornamental trees and landscaping. The areas surrounding the Project Site are fully developed, and there are no large expanses of open space areas within and surrounding the Project Site that provide linkages to natural open spaces areas that may serve as wildlife corridors. The Project Site is also not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City or County of Los Angeles.[34,35] Therefore, the Project Site and surroundings do not include areas that could be used as wildlife corridors.

The Project Site is relatively flat with limited ornamental landscaping. As discussed in the Tree Report prepared for the Project, included in Appendix IS-A of this Initial Study, there are 28 private property trees and 22 City right-of-way trees associated with the Project Site. Construction of the Project would require the removal of a total of 11 trees, six on-site trees located within Lots 1 and 4 on the southern portion of the Site (see Exhibit C in Appendix IS-1) and five street trees.

No other on-site or street trees would be removed. Although unlikely, the trees to be removed could potentially provide nesting sites for migratory birds. The Project would comply with the Migratory Bird Treaty Act, which prohibits the take, possession, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid permit issued pursuant to federal regulations. Additionally, California Fish and Game

---

33 U.S. Environmental Protection Agency, NEPAssist, www.epa.gov/nepa/nepassist, accessed March 15, 2021.

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

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

Code Section 3503 states that "[i]t is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto." No exceptions are provided in the California Fish and Game Code and CDFW has never promulgated any regulations interpreting these provisions.

In accordance with the Migratory Bird Treaty Act and California Fish and Game Code, tree removal activities associated with the Project would take place outside of the nesting season (February 1–August 31), to the extent feasible. Should vegetation removal activities occur during the nesting season, a biological monitor would be present during the removal activities to ensure that no active nests would be impacted. If active nests are found, a buffer would be established until the fledglings have left the nest. The size of the buffer area varies with species and local circumstances (e.g., presence of busy roads) and is based on the professional judgement of the monitoring biologist, in coordination with CDFW.

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

e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?

Less Than Significant Impact. The City of Los Angeles Protected Tree Ordinance (LAMC Chapter IV, Article 6) regulates the relocation or removal of all Southern California native oak trees (excluding scrub oak), California black walnut trees, Western sycamore trees, and California Bay trees of at least 4 inches in diameter at breast height, as well as Mexican Elderberry and Toyon. These tree species are defined as "protected" by the City of Los Angeles. Trees that have been planted as part of a tree planting program are exempt from the City's Protected Tree Ordinance and are not considered protected. The City's Protected Tree Ordinance prohibits, without a permit, the removal of any regulated protected tree, including "acts which inflict damage upon root systems or other parts of the tree…" and requires that all regulated protected trees that are removed be replaced on at least a 4:1 basis with trees that are of a protected variety.

Based on the Tree Report included in Appendix IS-A of this Initial Study, there are 28 on-site trees and 22 street trees adjacent to the Project Site. There are no native oaks, sycamores, bay laurel, southern California black walnut, toyon, or Mexican elderberry trees associated with the Project Site.[36] Of the 11 trees within Lots 1 and 4 that would be removed as part of the Project and Future Campus Expansion Phase, two are non-protected/significant trees, four are significant trees, and five are City right-of-way trees. No trees associated with the remainder of the Project Site would be removed. As part of the Project, a total of 53 new trees would be planted within the Project Site and six new street trees would be planted along adjacent streets. Therefore, as there are no protected trees on the Project Site, in compliance with the City's tree replacement requirements, including those for City right-of-way trees, the Project would not conflict with any local policies or ordinances protecting biological resources. Impacts

[36] As indicated in the Tree Report included as Appendix IS-A of this Initial Study, there are two coast live oaks and one western sycamore located within the Project Site. They were intentionally planted and not naturally occurring; therefore they do not meet the Ordinance definition of protected trees.

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

f. Would the project 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. As discussed in Section 3, Project Description, of this Initial Study, the Project Site is located in an urbanized area and is currently developed with warehouse and office uses, surface parking, and a parking structure. As described above, the Project Site does not support any habitat or natural community.[37,38] No Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site.[39] Thus, the Project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other related plans. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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 dedicated cemeteries?	☐	☐	☒	☐

a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

Potentially Significant Impact. Section 15064.5 of the CEQA Guidelines generally defines a historical resource as a resource that is: (1) listed in, or determined to be eligible for listing in the California Register of Historical Resources (California Register); (2) included in a local register of historical resources (pursuant to Section 5020.1(k) of the PRC); or (3) identified as significant in an historical resources survey (meeting the criteria in Section 5024.1(g) of the PRC). In addition, any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational,

[37] California Department of Fish and Wildlife, Biogeographic Information and Observation System (BIOS https://apps.wildlife.ca.gov/bios/, accessed March 15, 2021.

[38] United States Fish and Wildlife Service, National Wetlands Inventory, www.fws.gov/wetlands/data/Mapper.html, accessed March 15, 2021.

[39] California Department of Fish and Wildlife, California Regional Conservation Plans, April 2019.

social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register. The California Register automatically includes all properties listed in the National Register of Historic Places (National Register) and those formally determined to be eligible for listing in the National Register. The local register of historical resources is managed by the Los Angeles Office of Historic Resources, which operates SurveyLA, a comprehensive program to identify significant historical resources throughout the City.

As previously described, the Project Site is currently developed with warehouse and office uses, surface parking, and a parking structure. Some of the buildings within and adjacent to the Project Site appear to be 50 or more years old. In addition, the Warner Music Group building on-site is listed on the California Register[40], and eligible for listing in the National Register and for designation as a City of Los Angeles Historic Cultural Monument under criterion A/1/1 and criterion C/3/3 for its association with Ford Motor Company from 1914 to 1942. Therefore, further evaluation of the Project's, including the Future Campus Expansion Phase, potential impacts on historical resources will be included in the EIR.

b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines §15064.5?

Potentially Significant Impact. CEQA Guidelines Section 15064.5(a)(3)(D) generally defines archaeological resources as any resource that "has yielded, or may be likely to yield, information important in prehistory or history." Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community. The Project Site is located within an urbanized area of the City and has been subject to grading and development in the past. Therefore, surficial archaeological resources that may have existed at one time have likely been previously disturbed. As discussed in Section 3, Project Description, of this Initial Study, the Project would involve excavation to a maximum depth of 45 feet. Thus, the Project, including the Future Campus Expansion Phase, could have the potential to disturb previously undiscovered archaeological resources. Therefore, the EIR will provide further analysis of the Project's potential impacts to archaeological resources.

c. Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant Impact. As discussed above, the Project Site is located within an urbanized area and has been subject to previous grading and development. Therefore, the potential for uncovering human remains on the Project Site is low. Nevertheless, the Project would require grading, excavation, and other construction activities that could have the potential to disturb existing but undiscovered human remains. If human remains were discovered during construction of the Project, work in the immediate vicinity of the construction area would be halted, the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5. In addition, disposition of the human remains and any associated grave goods would occur in accordance with PRC Section

[40] Los Angeles Conservancy, Warner Music Group Headquarters, www.laconservancy.org/locations/warner-music-group-headquarters, accessed June 21, 2021.

5097.98 and CEQA Guidelines Section 15064.5(e), which requires that work stop near the find until a coroner can determine that no investigation into the cause of death is required and if the remains are Native American. Specifically, in accordance with CEQA Guidelines Section 15064.5(e), if the coroner determined the remains to be Native American, the coroner shall contact the Native American Heritage Commission who shall identify the person or persons it believes to be most likely descended from the deceased Native American. The most likely descendent may make recommendations regarding the treatment of the remains and any associated grave goods in accordance with PRC Section 5097.98. Therefore, due to the low potential that any human remains are located on the Project Site, and because compliance with the regulatory standards described above would ensure appropriate treatment of any potential human remains unexpectedly encountered during grading and excavation activities, the Project's impact related to human remains would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is 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?	☒	☐	☐	☐

a. Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Potentially Significant Impact. As discussed in Section 3, Project Description, of this Initial Study, the Project Site is currently developed with warehouse and office uses, surface parking, and a parking structure. The Project includes the development of a new 13-story, 450,599 square-foot building featuring 435,100 square feet of office uses, 15,499 square-feet of ground floor retail and/or restaurant uses, and 1,264 automobile parking spaces in one at-grade, two above-grade, and four below-grade parking levels within Lot 1 of the Project Site and the Future Campus Expansion Phase would include the development of 211,201 square feet of office uses within Lot 4 of the Project Site. Due to increased floor area and type of uses, the Project would generate an increased demand for electricity and natural gas services provided by the Los Angeles Department of Water and Power (LADWP) and the Southern California Gas Company, respectively, compared to existing conditions. While development of the Project would not be anticipated to cause wasteful, inefficient, and unnecessary consumption of energy resources, further analysis of the Project's, including the Future Campus Expansion Phase, demand on existing energy resources will be provided in the EIR.

b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Potentially Significant Impact. First established in 2002 under SB 1078, California's Renewable Portfolio Standards currently require retail sellers of electric services such as LADWP to increase procurement from eligible renewable energy resources to 60 percent of total retail sales by 2030.[41] The LADWP provides electrical service throughout the City and many areas of the Owens Valley. LADWP generates power from a variety of energy sources, including hydropower, coal, gas, nuclear sources, and renewable resources, such as wind, solar, and geothermal sources.

Regarding energy efficiency, the California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) were adopted to ensure that building construction, system design, and installation achieve energy efficiency and preserve outdoor and indoor environmental quality. The current California Building Energy Efficiency Standards (Title 24 standards) are the 2019 Title 24 standards, which became effective on January 1, 2020.[42] The 2019 Title 24 standards include efficiency improvements to the residential standards for attics, walls, water heating, and lighting and efficiency improvements to the non-residential standards include alignment with the American Society of Heating and Air-Conditioning Engineers *(*ASHRAE) 90.1 2013 national standards.[43]

As previously described, the Project Site is currently developed with warehouse and office uses, surface parking, and a parking structure. The Project would incorporate features to support and promote environmental sustainability required by the City of Los Angeles Green Building Code and CalGreen. While the Project would not be anticipated to conflict with or obstruct a state or local plan for renewable energy or energy efficiency, the Project's, including the Future Campus Expansion Phase, compliance with LADWP's plans for renewable energy, as well as the Project's compliance with California Building Energy Efficiency Standards, will be further evaluated in the EIR.

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:				

41 CPUC, California Renewables Portfolio Standard (RPS), www.cpuc.ca.gov/rps/, accessed April 6, 2021.

42 CEC, 2019 Building Energy Efficiency Standards, www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency, accessed April 15, 2021.

43 CEC, 2019 Building Energy Efficiency Standards for Residential and Nonresidential Buildings, December 2018.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

The following analysis of geology and soils is based on the Geotechnical Assessment for 2045 Violet Street (referred to herein as the Geotechnical Assessment) prepared for the Project by Geotechnologies Inc., dated October 2020. All specific information on geologic and soils conditions in the discussion below is from this reports unless otherwise noted. This report is included as Appendix IS-2 of this Initial Study.

The analysis of paleontological resources is based on the Paleontological Records Search prepared for the Project by the Natural History Museum of Los Angeles County on May 4, 2021. These search results are included as Appendix IS-C of this Initial Study.

a. Would the project 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. Fault rupture occurs when movement on a fault deep within the earth breaks through to the surface. Based on criteria established by the California Geological Survey, faults can be classified as active, potentially active, or inactive. Active faults are those having historically produced earthquakes or shown evidence of movement within the past 11,000 years (during the Holocene Epoch). Potentially active faults have demonstrated displacement within the last 1.6 million years (during the Pleistocene Epoch) while not displacing Holocene Strata. Inactive faults do not exhibit displacement younger than 1.6 million years before the present. In addition, there are buried thrust faults, which are faults with no surface exposure. Due to their buried nature, the existence of buried thrust faults is usually not known until they produce an earthquake.

The California Geological Survey establishes regulatory zones around active faults, called Alquist-Priolo Earthquake Fault Zones (previously called Special Study Zones). These zones, which extend from 200 to 500 feet on each side of the known fault, identify areas where a potential surface fault rupture could prove hazardous for buildings used for human occupancy. Development projects located within an Alquist-Priolo Earthquake Fault Zone are required to prepare special geotechnical studies to characterize hazards from any potential surface ruptures. In addition, the City designates Fault Rupture Study Areas along the sides of active and potentially active faults to establish areas of potential hazard due to fault rupture.[44]

Based on the Geotechnical Assessment and a review of the City's General Plan Safety Element, the Project Site is not within an Alquist-Priolo Earthquake Fault Zone or within a City-designated Fault Rupture Study Area, and no known active faults underlie the Project Site.[45] As stated in the Geotechnical Assessment, the Elysian Park thrust fault is the closest active fault considered capable of surface rupture, located approximately 2.4 miles (3.9 kilometers) north of the Project Site. However, as concluded in the Geotechnical Assessment, the risk for surface rupture at the Project Site is considered low as there are no known faults underlying the Project Site. Furthermore, while the Project would involve excavation for four subterranean parking levels, the proposed development would not involve mining operations or deep excavation into the earth, which could create unstable seismic conditions or stresses in the Earth's crust. The Project would not exacerbate existing fault rupture conditions and thus, the Project would not exacerbate existing environmental conditions by introducing people or structures into areas potentially susceptible to substantial adverse effects, including fault rupture. Therefore, the Project's, including the Future Campus Expansion Phase, impacts associated with surface rupture from a known earthquake fault would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

ii. Strong seismic ground shaking?

Less Than Significant Impact. The Project Site is located in the seismically active Southern California region, which generally experiences moderate to strong ground shaking in the event of an earthquake on a local or regional fault. However, as noted above, no active faults are known to pass directly beneath the

---

[44] City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit A, p. 47.

[45] City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5166014001, 5166014003, and 5166014012, http://zimas.lacity.org/, accessed April 15, 2021.

Project Site. In addition, state and local code requirements ensure that buildings are designed and constructed in a manner that, although the buildings may sustain damage during a major earthquake, would reduce the substantial risk that buildings would collapse. Specifically, the state and City mandate compliance with numerous rules related to seismic safety, including the Alquist-Priolo Earthquake Fault Zoning Act, Seismic Safety Act, Seismic Hazards Mapping Act, the City's General Plan Safety Element, and the Los Angeles Building Code. Pursuant to those laws, the Project must demonstrate compliance with the applicable provisions of these safety requirements before permits can be issued for construction of the Project. Accordingly, the design and construction of the Project would comply with all applicable existing regulatory requirements, the applicable provisions of the Los Angeles Building Code relating to seismic safety, and the application of accepted and proven construction engineering practices. The Los Angeles Building Code incorporates current seismic design provisions of the 2019 California Building Code, with City amendments, to minimize seismic impacts. The 2019 California Building Code incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and maximize earthquake safety. The Los Angeles Department of Building and Safety (LADBS) is responsible for implementing the provisions of the Los Angeles Building Code, and the Project would be required to comply with the plan review and permitting requirements of the LADBS, including the recommendations provided in a final, site-specific geotechnical report subject to review and approval by the LADBS.

The Project would not involve mining operations, deep excavations into the earth, or borings of large areas and thus would not exacerbate potential on-site seismic conditions.

Based on information above, through compliance with regulatory requirements and site-specific geotechnical recommendations contained in a final design-level geotechnical engineering report, the Project, including the Future Campus Expansion Phase, would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. Impacts related to strong seismic ground shaking would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction involves the sudden loss in strength of a saturated, cohesionless soil caused by the build-up of pore water pressure during cyclic loading, such as that produced by an earthquake. This increase in porewater can temporarily transform the soil into a fluid mass, resulting in differential settlement, and can also cause ground deformations. Typically, liquefaction occurs in shallow groundwater areas where there are loose, cohesionless, fine grained soils.

As discussed in the Geotechnical Assessment, the Project Site is not located in a State of California designated Liquefaction Hazard Zone and is not located in an area susceptible to liquefaction as designated by the City's General Plan Safety Element.[46] In addition, as concluded in the Geotechnical Assessment, current groundwater at the Project Site may be as shallow as 90 feet and was observed at 91 feet, while the historically highest groundwater level at the Project Site is approximately 160 feet below ground surface. As discussed in the Geotechnical Assessment, the subsurface soil conditions consist of medium dense to dense materials in the upper layer underlain by dense to very dense sands, and is not susceptible to liquefaction. Therefore, the Project would not directly or indirectly cause potential

[46] City of Los Angeles, General Plan, Safety Element, Exhibit B, 1996.

substantial adverse effects, including the risk of loss, injury, or death involving liquefaction. Impacts associated with liquefaction would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

iv. Landslides?

No Impact. Landslides can occur in loosely consolidated, wet soil and/or rocks on steep sloping terrain during precipitation, soil disturbance, changes in groundwater, or seismic activity. The Project Site is not located in a landslide area as mapped by the State[47] or the City.[48,49] Development of the Project would not substantially alter the existing topography of the Project Site. Specifically, the Project does not propose creating any steep slopes or altering the Project Site's terrain. Therefore, the Project, including the Future Campus Expansion Phase, would not exacerbate existing conditions that could result in the exposure of people and/or buildings to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. As such, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

b. Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. As discussed in Section 3, Project Description, of this Initial Study, the Project Site is currently fully developed with warehouse and office uses, surface parking, and a parking structure. As such, currently there are no on-site undeveloped areas and the Project, including the Future Campus Expansion Phase, would not result in areas of exposed topsoil. Development of the Project would require grading, excavation, and other construction activities that have the potential to disturb existing soils underneath the Project Site and expose these soils to rainfall and wind during construction, thereby potentially resulting in soil erosion. This potential would be reduced by implementation of standard erosion controls imposed during site preparation and grading activities. Specifically, all grading activities. Including those for the Future Campus Expansion Phase, would require grading permits from the LADBS, which would include requirements and standards designed to limit potential effects associated with erosion to acceptable levels. In addition, on-site grading and site preparation would comply with all applicable provisions of Chapter IX, Article 1 of the LAMC, which addresses grading, excavations, and fills. Regarding soil erosion during Project operations, the potential is negligible since the Project Site would remain fully developed with hardscape or landscaped surfaces. Furthermore, the Project would be required to comply with the City's Low Impact Development (LID) ordinance and implement standard erosion controls to limit stormwater runoff, which can contribute to erosion. Therefore, with compliance with applicable regulatory requirements, impacts regarding soil erosion or the loss of topsoil would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

c. Would the project 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?

---

47 California Geological Survey, Earthquake Zones of Required Investigation, https://maps.conservation.ca.gov/cgs/EQZApp/app/, accessed March 16, 2021.

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

49 City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5166014001, 5166014003, and 5166014012, http://zimas.lacity.org/, accessed April 15, 2021.

Less Than Significant Impact. As discussed above, the Project Site is not located near slopes or geologic features that would result in on- or off-site landsliding. Therefore, no impacts related to landslides would occur, and no mitigation measures are required.

Liquefaction-related effects include lateral spreading. As evaluated in the Geotechnical Assessment and discussed above, the Project Site is not susceptible to liquefaction potentially resulting in lateral spreading. Impacts related to liquefaction and lateral spreading would be less than significant, and no mitigation measures are required.

Subsidence generally occurs when a large portion of land is displaced vertically, usually due to the withdrawal of groundwater, oil, or natural gas. No large scale extraction of groundwater, gas, oil or geothermal energy is occurring or planned at the Project Site or in the general vicinity of the Project Site. Furthermore, according to the Geotechnical Assessment, the site is not located within a zone of known subsidence due to oil or other fluid withdrawal, and as such there is minimal to no potential for ground subsidence due to withdrawal of fluid or gas at the Project Site. Thus, impacts related to subsidence would be less than significant, and no mitigation measures are required.

Collapsible soils consist of loose, dry, low-density materials that collapse and compact under the addition of water or excessive loading. Soil collapse occurs when the land surface is saturated at depths greater than those reached by typical rain events. According to the Geotechnical Assessment, the soils underlying the Project Site indicate medium dense to dense materials in the upper layer underlain by dense to very dense sands. Due to the type and density of the soils underlying the Project Site, the Project Site soils would not be considered collapsible soils. Therefore, the Project Site is not 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 collapse. Impacts associated with collapsible soils would be less than significant, and no mitigation measures are required.

Based on the above, the Project would not cause a geologic unit or soil to become unstable. The Project, including the Future Campus Expansion Phase, would not exacerbate existing conditions with regard to geologic or soil stability. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

d. Would the project 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. Expansive soils are typically associated with clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. As discussed in the Geotechnical Assessment, the underlying site conditions include artificial fill materials underlain by naturally occurring soils generally consisting of medium dense to dense materials in the upper layer and dense to very dense sands below the upper layer. The on-site geological materials are considered to be expansive and are classified in the low to moderately expansive range. As discussed in the Geotechnical Assessment, special design considerations for mitigation of highly expansive soils will not likely be required and were not proposed. Therefore, with design of the proposed structure in accordance with the California Building Code, the Project would not exacerbate existing environmental conditions that could create substantial risk to life or property due to expansive soils. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

e. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. The Project Site is located within a community served by existing wastewater infrastructure. The Project's wastewater demand would be accommodated by connections to the existing wastewater infrastructure. As such, the Project would not require the use of septic tanks or alternative wastewater disposal systems. Therefore, the Project would have no impact related to the ability of soils to support septic tanks or alternative wastewater disposal systems. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact. Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms, since the majority of species that have existed on earth from this era are extinct.

As the Project Site has been previously graded and developed, surficial paleontological resources that may have existed at one time have likely been previously disturbed. In addition, a paleontological records search conducted by the Natural History Museum for the Project Site included in Appendix IS-3 of this Initial Study indicates there are no known fossil localities within the Project Site, but fossil localities have been identified nearby from the same sedimentary deposits that occur in within the Project Site. Specifically, according to the Natural History Museum, the nearest paleontological resources identified include horse (Equus) found at 43 feet below ground surface (bgs) near the intersection of 12th Street and Hill Street; sabertooth cat (Smilodon), horse (Equus), deer (Odocoileus), and turkey (Meleagris) found at an unknown depth near the intersection of Workman Street and Alhambra Street; mastodon (Mammut) found at 20-35 feet bgs near the intersection of Mission Road and Daly Street; horse (Equus) found at an unknown depth west of Monterey Pass Road in Coyote Pass, east of the Long Beach Freeway, and south of the northern boundary of Section 32; and fish (Gasterosteus), snake (Colubridae), rodents (Thomomys and Microtus), and rabbit (Sylvilagus) found at 30 feet bgs near the intersection of 26th Street and Atlantic Boulevard in Bell Gardens.

The Project would include excavations up to a maximum depth of 45 feet below ground surface. Thus, the possibility exists that paleontological artifacts that were not discovered during prior construction or other human activity may be present. The City has established a standard condition of approval to address inadvertent discovery of paleontological resources. Should paleontological resources be inadvertently encountered, the City's condition of approval provides for temporarily halting construction activities near the encounter and retaining a qualified paleontologist to assess the find and, if necessary, developing a plan for removal and treatment of the find. Overall, with adherence to the City's condition of approval, the Project would not directly or indirectly destroy a unique paleontological resource. Although, the Natural History Museum letter recommends a full paleontological assessment, both the results of the paleontological records search and the Geotechnical Assessment serve as substantial evidence to make the conclusion that impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

With regard to a unique geologic feature, the Project Site is currently developed with warehouse and office uses, surface parking, and parking structure and there are no unique geologic features on the Project Site. Therefore, the Project would not directly or indirectly destroy a unique geologic feature. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is 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?	☒	☐	☐	☐

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

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

b. Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

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

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?	☐	☐	☒	☐
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?	☐	☐	☐	☒

The following analysis is based primarily on the Phase I Environmental Site Assessment prepared for 2020 and 2040 East 7th Place and 2045 Violet Street, dated March 2020, (referred to herein as the Phase I ESA) prepared for the Project by Ramboll US Corporation with supplemental information from the Phase I Environmental Site Assessment prepared for the Ford Factory by Property Solutions Inc. in March 2019, referred to herein as the Ford Factory ESA. All specific information regarding the Project Site's hazards conditions in the discussion below is from these reports unless otherwise noted. These reports are included as Appendices IS-4 and IS-5 of this Initial Study, respectively.

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

Less Than Significant Impact. The types and amounts of hazardous materials to be used for the Project would be typical of those used during construction activities and those typically used in the operation of commercial uses, as discussed in the following analysis.

Construction

The Project would not involve the routine transport of hazardous materials to and from the Project Site during construction. During demolition, excavation, on-site grading, and building construction, hazardous materials such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners could be routinely used on the Project Site through the duration of construction. While some hazardous materials used during construction could require disposal, such activity would occur only for the duration of construction and would cease upon completion of the Project. As such, construction of the Project would not involve the routine disposal of hazardous materials. Notwithstanding, all potentially hazardous materials used during construction of the Project would be used and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. In addition, existing regulations are aimed at establishing specific guidelines regarding risk planning and accident prevention, protection from exposure to specific chemicals, and the proper storage of hazardous materials. The Project would comply with all applicable federal, state, and local requirements concerning the use, storage, and management of hazardous materials, including, but not limited to the Resource Conservation and Recovery Act, California Hazardous Waste Control Law, Federal and State Occupational Safety and Health Acts, SCAQMD rules, and permits and associated conditions issued by LADBS. Such requirements include obtaining material safety data sheets from chemical manufacturers, making these data sheets available to employees, labeling chemical containers in the workplace, developing and maintaining a written hazard communication program, and developing and implementing programs to train employees about hazardous materials Consequently, Project construction activities, including the construction activities which would occur during the Future Campus Expansion Phase, would not create a significant hazard to the public or the environment through the use of hazardous materials during construction. Therefore, impacts related to the routine transport, use, or disposal of hazardous materials during construction would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

Operation

Operation of the Project would involve the routine use of small quantities of potentially hazardous materials typical of those used in commercial uses, including cleaning products, paints, and those used for maintenance of landscaping. Such use would be consistent with that currently occurring at other nearby developments. In addition, as with Project construction, all hazardous materials used on the Project Site during operation, including during operation of the Future Campus Expansion Phase, would be used, stored, and disposed of in accordance with all applicable federal, state, and local requirements. Due to the type of development proposed (e.g., office and commercial), operation of the Project would not involve the routine transport of hazardous materials to and from the Project Site. Therefore, with implementation of appropriate hazardous materials management protocols at the Project Site and compliance with all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials, impacts associated with the routine transport, use, or disposal of hazardous materials during operation of the Project would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

b. Would the project 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. Current and past on-site land uses were identified as part of the Phase I ESA and Ford Factory ESA to assess their potential to present concerns relative to the presence of hazards and/or the handling of hazardous materials. These concerns are classified as Recognized Environmental Conditions (RECs), which are defined in Section 1.1.1 of the ASTM Standard Practice as the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, past release, or material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property.

As discussed in the Phase I ESA and Ford Factory ESA, the Project Site was either undeveloped land or contained residential uses in the early 1900s. From 1906 to at least the late 1930s, a city playground was constructed on-site with an associated gymnasium along the western edge of the Project Site. By the late 1940s, the 2020 East 7th Place property on the western portion of the Project Site was utilized as an auto/truck repair shop and truck parking. These former buildings on the western portion of the Project Site were demolished in 2002 and the current warehouse was constructed for the packaging and distribution of agricultural products, including two associated underground storage tanks (USTs) for fuel which remain on-site.

The 2040 East 7th Place property on the northeastern portion of the Project Site was connected to the city playground from 1923 until 1948, when it was developed into a motor freight depot, truck storage, and loading dock until approximately 1978, with at least one UST for fuel which has since been removed. In that year, the building was renovated and used for agricultural products distribution until at least 1990. In 1995, the property was used as an impound yard. From 2008 to 2014, the property was used as a storage yard and a parking lot. From 2014 to the present day, the property continues to be used as a parking lot.

The 2045 Violet Street property on the southeastern portion of the Project Site was undeveloped until 1906 when it was developed as a city playground with a playground field house. In 1929 it was redeveloped for commercial use, including a grocery and liquor store. The property contained various commercial uses including a fleet maintenance and truck rental company in 1951 and a plastics manufacturer from 1958 to 1962. Between the 1960s and the early 2000s, various commercial uses occupied the property including a freight line facility, box manufacturer, market, and produce company. 2045 Violet Street is currently occupied by an athletic apparel company, with operations including clothing design, packaging, shipping, and administration.

Based on a review of the relevant Munger oil and gas field maps and State of California Geologic Energy Management Division (CalGEM), Well Finder GIS, the Project Site is not located within any oil or gas field, and no oil or natural gas wells were located on the Project Site.

Both the Phase I ESA and Ford Factory ESA for the properties within the Project Site revealed that there are no RECs or Controlled Recognized Environmental Conditions (CRECs), or Historic Recognized Environmental Conditions (HRECs). As previously discussed, auto/truck service station and fleet maintenance uses were previously present at the Project Site. As a result, the Phase I ESA concluded

that as many as 13 USTs were formerly present on-site for the storage of vehicle fuel and diesel, which appear to have been removed between the 1950s and 1980s, but records for six of the removals was not available. In addition, two USTs are currently present on-site to fuel trucks in connection to the agricultural products distribution warehouse. None of the USTs were located on the Leaking Underground Storage Tanks (LUST) list, and their presence is not considered to be a concern at this time. Previous soil sampling conducted at the Project Site revealed low levels of total petroleum hydrocarbons (TPH) and volatile organic compounds (VOCs) that were left in place.

However, as provided in the Phase I ESA, there may be a potential for unknown USTs or residual contaminates in the underlying soil to be present, requiring proper handling and disposal and monitoring. If contaminated soils are encountered during construction, or construction occurs in areas of known or potential contamination, the nature and extent of the contamination would be determined and appropriate handling, disposal, and/or treatment would be implemented in accordance with applicable regulatory requirements, including SCAQMD Rule 1166. Specifically, SCAQMD Rule 1166 requires that an approved mitigation plan be obtained from SCAQMD prior to commencing any of the following activities: the excavation of a UST or piping which has stored volatile organic compounds (VOCs); the excavation or grading of soil containing VOC material including gasoline, diesel, crude oil, lubricant, waste oil, adhesive, paint, stain, solvent, resin, monomer, and/or any other material containing VOCs; the handling or storage of VOC-contaminated soil [soil which registers >50 parts per million (ppm) or greater using an organic vapor analyzer (OVA) calibrated with hexane] at or from an excavation or grading site; or the treatment of VOC contaminated soil at a facility. SCAQMD Rule 1166 further requires that a copy of the approved mitigation plan be on site during the entire excavation period and that the SCAQMD executive officer be notified at least 24 hours prior to excavation. In accordance with SCAQMD Rule 1166, monitoring for VOC contamination would occur at least once every 15 minutes and VOC concentration readings would be recorded. When VOC contaminated soil is detected, the approved remediation plan would be implemented. Therefore, compliance with existing regulations would ensure the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the handling and disposal of contaminated soil that may be encountered on-site.

Construction

Hazardous Waste Generation, Handling, and Disposal

During demolition, excavation, on-site grading, and building construction, hazardous materials such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners, could be used, and therefore, would require proper handling and management and, in some cases, disposal. The use, handling, storage, and disposal of these materials could increase the opportunity for hazardous materials releases and, subsequently, the exposure of people and the environment to hazardous materials. However, as previously discussed, all potentially hazardous materials used during construction of the Project would be used and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. In addition, the Project, including the Future Campus Expansion Phase, would comply with all applicable federal, state, and local requirements concerning the use, storage, and management of hazardous materials. Consequently, Project construction activities would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of potentially hazardous materials used during construction.

As discussed above, as many as 13 USTs were formerly present on-site. These USTs appear to have been removed, but records for six of the removals were not available. In addition, two USTs are currently present on-site. None of the USTs were located on the Leaking Underground Storage Tanks (LUST) list, and their former presence is not considered to be a concern. Previous soil sampling conducted at the Project Site revealed low levels of TPH and VOCs that were left in place. However, as provided in the Phase I ESA, there may be a potential for unknown USTs or residual contaminates in the underlying soil to be present, requiring proper handling and disposal and monitoring. In the event that contaminated soils are encountered during construction, or construction occurs in areas of known or potential contamination, the nature and extent of the contamination would be determined and appropriate handling, disposal, and/or treatment would be implemented in accordance with applicable regulatory requirements, including SCAQMD Rule 1166. In accordance with SCAQMD Rule 1166, monitoring for VOC contamination would occur at least once every 15 minutes and VOC concentration readings would be recorded. When VOC contaminated soil is detected, the approved mitigation plan would be implemented. Therefore, compliance with existing regulations would ensure the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the handling and disposal of contaminated soil that may be encountered on-site.

In addition, according to the Phase I ESA, an on-site vapor survey was conducted in February 2020 in the north-south alley that bisects the Project Site to assess potential impacts from former industrial operations at the Ford Factory Building, now occupied by Warner Records. As concluded in the Phase I ESA, VOCs were not reported above respective laboratory reporting limits in any of the samples collected, and low levels of tetrachloroethylene (PCE) and Freon 11 were reported in the vapor samples. Based on the results of the vapor survey, the Phase I ESA concluded that it does not appear that VOC releases, if any, from the adjacent Ford Factory property, have migrated toward the Project Site in a manner that would result in an adverse soil condition at the Project Site. Furthermore, there are no visible signs of mold on the Project Site and the potential for radon to be a concern is low.

Based on the above, construction of the Project, including the Future Campus Expansion Phase, 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 impacts associated with hazardous waste generation, handling, and disposal during construction would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

Underground and Aboveground Storage Tanks

According to the Phase I ESA, no evidence of existing aboveground storage tanks was observed on the Project Site, but two USTs are currently present on-site in connection to the agricultural products distribution warehouse, and as many as 13 USTs were previously present on-site due to former truck service station and repair uses. The 13 previous USTs appear to have been removed between the 1950s and 1980s, but records for six of the removals was not available. The Ford Factory ESA also identified one former UST within the Project Site that has since been removed. In the event that unknown USTs are found, suspect materials would be removed in accordance with all applicable federal, state, and local regulations. For example, if USTs are encountered, prior to removal, applicable permits would be obtained from the Los Angeles Fire Department (LAFD). Therefore, with compliance with applicable regulations, the Project, including the Future Campus Expansion Phase, 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 impacts related to the potential removal of USTs during construction would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

Asbestos-Containing Materials

Asbestos was widely used in the building industry starting in the late 1800s and up until the late 1970s for a variety of uses, including acoustic and thermal insulation and fireproofing, and is often found in ceiling and floor tiles, linoleum, pipes, structural beams, and asphalt. Any building, structure, surface asphalt driveway, or parking lot constructed prior to 1979 could contain asbestos or Asbestos Containing Materials (ACMs). Based on the age of the on-site buildings (i.e., constructed as early as 1940), ACMs may be present on-site, but because these buildings underwent renovations in 2002 and 2015, it is unlikely that significant amounts of ACMs remain. Thus, with compliance with relevant regulations and requirements, Project construction activities would not expose people to a substantial risk resulting from the release of asbestos fibers into the environment. Therefore, with compliance with applicable regulations, 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. Impacts related to the removal of ACMs during demolition would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

Lead-Based Paint

Lead is a naturally occurring element and heavy metal that was widely used as a major ingredient in most interior and exterior oil-based paints prior to 1950. Lead compounds continued to be used as corrosion inhibitors, pigments, and drying agents from the early 1950s to 1972, when the Consumer Products Safety Commission specified limits on lead content in such products. Based on the age of the on-site buildings, lead-based paint (LBP) may be present on-site. However, because these buildings underwent renovations in 2002 and 2015, it is unlikely that significant amounts of LBPs remain. In the event that LBP is found within areas proposed for demolition, suspect materials would be removed in accordance with procedural requirements and regulations for the proper removal and disposal of LBP prior to demolition activities, including standard handling and disposal practices pursuant to OSHA regulations. Example procedural requirements include the use of respiratory protection devices while handling lead-containing materials, containment of lead or materials containing lead on the Project Site or at locations where construction activities are performed, and certification of all consultants and contractors conducting activities involving LBP or lead hazards. With compliance with relevant regulations and requirements, Project construction activities would not expose people to a substantial risk resulting from the release of LBP into the environment. Therefore, with compliance with applicable regulations, 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. Impacts related to the removal of LBP during demolition would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

Polychlorinated Biphenyls

Typical sources of polychlorinated biphenyls (PCBs) include electrical transformer cooling oils, fluorescent light fixture ballasts, and hydraulic oil. In 1976, the USEPA banned the manufacture and sale of PCB-containing transformers. According to the Phase I ESA for the properties on the Project Site,

three pole-mounted electrical transformers and one pad-mounted electrical transformer are present on the property that appeared to be in good condition with no visible evidence of leakage. No other equipment likely to contain PCBs was observed on the Project Site. In the event that PCBs are found within areas proposed for demolition, suspect materials would be removed in accordance with all applicable federal, state, and local regulations. Therefore, with compliance with applicable regulations, 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 impacts related to the removal of PCBs during demolition would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

Oil Wells and Methane

As discussed in the Geotechnical Assessment included as Appendix IS-2 of this Initial Study, based on review of the City of Los Angeles online mapping resource, NavigateLA (Bureau of Engineering, Department of Public Works) the Project Site is not located within the limits of an oil field. No evidence of an oil or gas well has been drilled within the site. The closest oil wells in proximity to the site are about 0.6-mile northwest of the Project Site. The Project Site is also not found to be located within a designated Methane Zone or Methane Buffer Zone mapped by the City.

Operation

Hazardous Waste Generation, Handling, and Disposal

Operation of the Project would involve the routine use of small quantities of potentially hazardous materials typical of those used in commercial uses. As stated previously, activities involving the handling and disposal of hazardous wastes would occur in compliance with all applicable federal, state, and local requirements concerning the handling and disposal of hazardous waste. Therefore, with compliance with applicable regulations and requirements, operational activities 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 impacts associated with hazardous waste generation, handling, and disposal during operation of the Project would be less than significant. No further analysis of this topic in an EIR is required.

Underground and Aboveground Storage Tanks

Development of the Project includes office and commercial uses. The Project does not propose the installation of underground or aboveground storage tanks. As such, operation of 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 impacts associated with underground and aboveground storage tanks during operation of the Project would be less than significant. No further analysis of this topic in an EIR is required.

Asbestos-Containing Materials

Development of the Project would include the use of commercially-sold construction materials that would not include asbestos or ACMs. Project operation is, therefore, not anticipated to increase the occurrence of friable asbestos or ACMs at the Project Site. Therefore, operation of the Project, including the Future Campus Expansion Phase, 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 no impacts associated with asbestos or ACMs during operation of the Project would occur. No further analysis of this topic in an EIR is required.

Lead-Based Paint

Development of the Project would include the use of commercially-sold construction materials that would not include LBP. Project operation is, therefore, not anticipated to increase the occurrence of LBP at the Project Site. Operation of the Project, including the Future Campus Expansion Phase, would not expose people to LBP as no LBPs would be used. Thus, 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 impacts associated with LBP during operation of the Project would not occur. No further analysis of this topic in an EIR is required.

Polychlorinated Biphenyls

In accordance with existing regulations which ban the manufacture of PCBs, the new electrical systems to be installed as part of the Project would not contain PCBs. Therefore, during operation of the Project, maintenance of such electrical systems would not expose people to PCBs and operation of the Project would not expose people to any risk resulting from the release of PCBs in the environment. 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 no impacts related to PCBs during Project operation would occur. No further analysis of this topic in an EIR is required.

Oil Wells and Methane Gas

The Project does not include the installation of oil wells. As such, operation of 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 no impacts associated with oil wells during operation would occur. The Project is not within a Methane Zone or Methane Buffer Zone identified by the City. Therefore, there is a negligible risk of subsurface methane release. No further analysis of these topics in an EIR is required.

c. Would the project 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. Metropolitan High School is located 0.1 mile west of the Project Site. Although the Project would have the potential to emit and would involve the handling of hazardous materials, particularly during construction activities, including fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners, all such activities involving the handling and disposal of hazardous materials and wastes would occur in compliance with all applicable federal, state, and local requirements concerning the handling and disposal of hazardous waste. Similarly, the types and amounts of hazardous materials used during operation of the proposed uses would be typical of office and commercial developments, including cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products. Therefore, with compliance with relevant regulations and requirements, the Project would not create a significant hazard to nearby schools, and

impacts regarding the Project's emission or handling of hazardous materials and wastes would be less than significant. No mitigation measures and no further analysis of this topic in an EIR are required.

d. Would the project 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?

Less Than Significant Impact. Section 65962.5 of the California Government Code requires the California Environmental Protection Agency to develop and update annually the Cortese List, which is a "list" of hazardous waste sites and other contaminated sites. While Section 65962.5 makes reference to the preparation of a "list," many changes have occurred related to web-based information access since 1992 and information regarding the Cortese List is now compiled on the websites of multiple agencies. The Phase I ESA for the Project Site included the results of consultation with local agency representatives and a review of available federal, State, and local databases. The report documents findings of various federal, state, and local regulatory database searches regarding properties with known or suspected releases of hazardous materials or petroleum hydrocarbons.

Based on the Environmental Data Resources (EDR) database records search, portions of the Project Site are listed on hazardous materials or hazardous wastes databases. Specifically, the portion of the property located at 220 East 7th Place is listed on the CERS TANKS and UST governmental databases due to two inactive and one active UST related to past and present uses in servicing trucks and are not indicative of an environmental concern. Additionally, the portion of the property located at 2040 East 7th Place is listed on the CA FID UST and SWEEPS UST databases for a tank that was likely used for gasoline in association with truck serving uses which was installed in 1950 and removed in 1994. Soil sampling was conducted at the property which did not indicate significant impacts to the subsurface. Lastly, the portion of the property located at 2045 Violet Street is listed on the UST, CA FID UST and SWEEPS UST databases in association with its prior uses for truck fleet maintenance. As many as four USTs were previously located on the property and at least two of these were removed.

Therefore, based on the above, the Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard, and impacts regarding this threshold would be less than significant and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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. The Project Site is not located within an airport land use plan or within 2 miles of an airport. The closest airport to the Project Site is the Los Angeles International Airport (LAX), located approximately 12 miles southwest of the Project Site. Given the distance between the Project Site and the nearest airport, the Project would not result in a safety hazard or excessive noise for people residing or working in the Project area. Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. According to the Safety Element of the City of Los Angeles General Plan, the nearest disaster routes to the Project Site are the Hollywood Freeway (US-101), the Santa Monica Freeway (I-10), and the Golden State Freeway (I-5), which are all accessible within less than 1 mile of the Project Site. Alameda Street is also a designated disaster route located approximately 0.5 mile east of the Project Site. In addition, the Project Site is located 1.5 miles southeast of the Los Angeles Police Department's (LAPD) Central Bureau and the 2.6 miles southwest of Newton Community Police Station, which is located at 3400 South Central Avenue, and 0.6 mile south of LAFD Fire Station No. 17, located at 1601 South Santa Fe Avenue.[50,51] While it is expected that the majority of construction activities for the Project would be confined to the Project Site, limited off-site Project-related construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. The Project would coordinate with LAPD and LAFD to address any potential construction related impacts on access to and from the nearby LAPD and LAFD stations. Accordingly, the Project, including the Future Campus Expansion Phase, would not impair implementation of or physically interfere with an adopted emergency response plan or evacuation plan. Impacts would be less than significant, and no mitigation measures are required.

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

g. Would the project 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 an urbanized area of the City and there are no wildlands located on or in the vicinity of the Project Site. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone, nor is it located within a City-designated fire buffer zone. Therefore, the Project would not exacerbate conditions that would subject people or structures to a significant risk of loss, injury, or death as a result of exposure to wildland fires. Furthermore, the Project would be developed in accordance with LAMC requirements pertaining to fire safety. Specifically, Section 57.106.5.2 of the LAMC provides that the Fire Chief shall have the authority to require drawings, plans, and sketches as necessary to identify access points, fire suppression devices and systems, utility controls, and stairwells; Section 57.118 of the LAMC establishes LAFD's fire/life safety plan review and

[50] Los Angeles Police Department, Newton Community Police Station, http://lapdonline.org/newton_community_police_station, accessed April 2, 2021.

[51] Los Angeles Fire Department, Fire Station No. 17, www.lafd.org/fire-stations/station-17, accessed April 15, 2021.

LAFD's fire/life safety inspection for new construction projects; and Section 57.507.3.1 establishes fire water flow standards. Therefore, no impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is 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?	☐	☐	☒	☐
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?	☐	☐	☒	☐

The following analysis is based, in part, on the Hydrology and Stormwater Quality Study (Hydrology Report) prepared by KHR Associates in February of 2021 and is Appendix IS-6 of this Initial Study.

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. As discussed below, the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.

Surface Water Quality

Construction

As discussed in the Hydrology Report, construction activities such as earth moving, maintenance/ operation of construction equipment, potential dewatering, and handling/storage/disposal of materials could contribute to pollutant loading in stormwater runoff. During Project construction, particularly during the grading phase, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. Pollutant discharges relating to the storage, handling, use and disposal of chemicals, adhesives, coatings, lubricants, and fuel could also occur. However, as Project construction would disturb more than one acre of soil, the Project would be required to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit. In accordance with the requirements of the NPDES Construction General Permit, the Project would prepare and implement a site-specific Stormwater Pollution Prevention Plan (SWPPP) adhering to the California Stormwater Quality Association BMP Handbook. The SWPPP would specify Best Management Practices (BMPs) to be used during construction to manage stormwater and non-stormwater discharges. BMPs would include but not be limited to: erosion control, sediment control, non-stormwater management, and materials management BMPs. In addition, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), such as the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion.

As previously discussed, the Project would include excavation of the Project Site to a depth of approximately 45 feet below grade. As provided in the Geotechnical Assessment included in Appendix IS-2 of this Initial Study, groundwater was encountered at a depth of 91 feet below grade and the highest historic groundwater level is 160 feet. Therefore, groundwater is not likely to be encountered during Project construction and dewatering[52] is not anticipated to occur. Nevertheless, if groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with the NPDES permit. The temporary system would comply with all relevant NPDES requirements related to construction and discharges from dewatering operations. Furthermore, if dewatering is required, the treatment and disposal of the dewatering water would occur in accordance with the requirements of the Los Angeles Regional Water Quality Control Boards' (LARWQCB) Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties.

Based on the above, with compliance with NPDES requirements and City's grading permit regulations, construction of the Project would not result in discharges that would violate any surface water quality standard or waste discharge requirements. Thus, temporary construction-related impacts on surface

[52] Dewatering operations are practices that discharge non-stormwater, such as groundwater, that must be removed from a work location into a drainage system to proceed with construction. Discharges from dewatering operations can contain high levels of fine sediments, which, if not properly treated, could lead to exceedance of the NPDES requirements.

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

Operation

Operation of the Project, including the Future Campus Expansion Phase, would introduce sources of potential stormwater pollution that are typical of commercial uses (e.g., cleaning solvents, pesticides for landscaping, and petroleum products associated with vehicular circulation areas). Stormwater runoff from precipitation events could potentially carry urban pollutants into municipal storm drains. Anticipated and potential pollutants generated by the Project include sediment, nutrients, pesticides, metals, pathogens, and oil and grease. Under the City's LID Ordinance, post-construction stormwater runoff from new projects must be infiltrated, evapotranspirated, captured and used, and/or treated through high efficiency BMPs on-site for the volume of water produced by the 85th percentile storm event. Consistent with LID requirements to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site, the Project would include the installation of infiltration and capture and use BMPs as established by the LID Manual. The implementation of BMPs required by the City's LID Ordinance would target the pollutants that could potentially be carried in stormwater runoff. As discussed in the Hydrology Report, since it appears there are currently no existing on-site BMPs, stormwater run-off during post-Project conditions would result in improved surface water quality. Therefore, with the incorporation of LID BMPs, operation of the Project would not result in discharges that would violate any surface water quality standards or waste discharge requirements. Impacts to surface water quality during operation of the Project would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

Groundwater Quality

Construction

As provided in the Geotechnical Assessment included in Appendix IS-2 of this Initial Study, groundwater beneath the Project Site has been encountered at 91 feet below grade. Development of the Project would include excavations to a maximum depth of 45 feet below grade. Therefore, as previously discussed, groundwater is not likely to be encountered during Project construction and dewatering operations are not anticipated to occur. Nevertheless, in the event dewatering is required during Project construction, a temporary dewatering system would be installed and operated in accordance with NPDES requirements. Any discharge of groundwater during construction of the Project would occur pursuant to, and comply with, the applicable NPDES permit or industrial user sewer discharge permit requirements. Pursuant to such requirements, the groundwater extracted would be chemically analyzed to determine the appropriate treatment and/or disposal methods. As such, groundwater quality would not be impacted from these potential dewatering activities.

Other potential effects to groundwater quality could result from the presence of a UST or during the removal of a UST. As discussed above, two known USTs are located on the Project Site. Additional USTs may also be encountered during construction. Prior to removal, applicable permits would be obtained from the LAFD to ensure handling and removal in accordance with applicable standards. Therefore, USTs would not pose a significant hazard on groundwater quality.

There are also risks associated with contaminated soil impacting groundwater quality. In the event contaminated soils are encountered during construction, the nature and extent of the contamination would

be determined and appropriate handling, disposal, and/or treatment would be implemented in accordance with applicable regulatory requirements, including SCAQMD Rule 1166. Therefore, compliance with existing regulations would ensure the Project would not create a significant hazard to groundwater quality associated with potentially contaminated soil.

During on-site grading and building construction, hazardous materials, such as fuels, oils, paints, solvents, and concrete additives, could be used and would therefore require proper management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the potential for hazardous materials to be released into groundwater. Compliance with all applicable federal, state, and local requirements concerning the handling, storage and disposal of hazardous waste, would reduce the potential for the construction of the Project to release contaminants into groundwater.

Based on the above, construction of the Project would not result in discharges that would violate any groundwater quality standard or waste discharge requirements. Therefore, construction-related impacts on groundwater quality would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

Operation

The Project does not include the installation or operation of water wells, or any extraction or recharge system that is in the vicinity of the coast, an area of known groundwater contamination or seawater intrusion, a municipal supply well or spreading ground facility.

Operational activities that could affect groundwater quality include spills of hazardous materials and leaking underground storage tanks. Surface spills from the handling of hazardous materials most often involve small quantities and are cleaned up in a timely manner, thereby resulting in little threat to groundwater. Other types of risks such as leaking USTs have a greater potential to affect groundwater. The Project would not include the installation of USTs that would have the potential to expose groundwater to contaminants. In addition, the Project would comply with all applicable existing regulations that would prevent the Project from affecting or expanding any potential areas of contamination, increasing the level of contamination, or causing regulatory water quality standards at an existing production well to be violated, as defined in the California Code of Regulations, Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act. Therefore, operation of the Project would not result in discharges that would violate any groundwater quality standard or waste discharge requirements. The Project's potential impact on groundwater quality during operation would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

b. Would the project 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. As provided by the following analysis, the Project, including the Future Campus Expansion Phase, would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin.

Construction

No water supply wells are located at the Project Site or within 1 mile of the Project Site that could be impacted by construction, nor would the Project include the construction of water supply wells. Development of the Project would include excavations to a maximum depth of 45 feet below ground surface. As provided in the Geotechnical Assessment included in Appendix IS-2 of this Initial Study, groundwater was encountered at a depth of 91 feet. Therefore, groundwater is not likely to be encountered during Project construction and dewatering is not anticipated to occur. In the event dewatering is required, due to the limited and temporary nature of dewatering operations, impacts to groundwater supplies and management of the basin are not considered to be significant. Furthermore, the Project Site is almost entirely impervious (approximately 100 percent impervious on Lots 1 and 4 and 96 percent impervious on the remaining portion of the Project Site) in the existing condition and there is minimal groundwater recharge potential. Therefore, construction of the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. Impacts on groundwater supplies during construction of the Project would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

Operation

As previously discussed, the Project Site is almost entirely impervious under existing conditions. The Project, including the Future Campus Expansion Phase, would develop hardscape and structures that cover most of Lots 1 and 4 with impervious surfaces, and therefore the groundwater recharge potential will remain minimal. Furthermore, the Project's BMPs would control stormwater runoff with no increase in runoff resulting from the Project. As discussed further below, infiltration is proposed to manage stormwater on the Project Site, which would result in an increase in groundwater recharge. Also, the Project would not include the installation of water supply wells and there are no existing wells or spreading ground within 1 mile of the Project Site. Therefore, the Project, including the Future Campus Expansion Phase, would not decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

c. Would the project 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. The Project Site is not crossed by any water courses or rivers. Construction activities for the Project would include demolition of existing structures and hardscape and the excavation and removal of soil. These activities have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. Exposed and stockpiled soils could be subject to erosion and conveyance into nearby storm drains during storm events. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. However, as discussed above, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows. These BMPs are designed to contain stormwater or

construction watering on the Project Site such that runoff does not impact off-site drainage facilities or receiving waters. In addition, Project construction activities would occur in accordance with City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion. Thus, through compliance with all NPDES Construction General Permit requirements, including preparation of a SWPPP and implementation of BMPs, as well as compliance with applicable City grading permit regulations, construction activities for the Project would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion or siltation on- or off-site. As such, construction-related impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

As previously discussed, the Project Site is almost entirely impervious under existing conditions. The Project, including the Future Campus Expansion Phase, would not alter the amount of impervious surfaces on the Project Site. Accordingly, similar to existing conditions, there would be a limited potential for erosion or siltation to occur from exposed soils or large expanses of pervious areas. Therefore, the Project would not substantially alter the existing drainage pattern of the Project Site or surrounding area such that substantial erosion or siltation on-site or off-site would occur. Operational impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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. As indicated above, there are no streams or rivers within or immediately surrounding the Project Site. Construction activities for the Project would involve removal of the existing structures and associated hardscape as well as the excavation and removal of soil. These activities have the potential to temporarily alter existing drainage patterns on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. As noted above, the Project would implement a Local SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows and prevent pollution. These BMPs and erosion control measures would contain and treat, as necessary, stormwater or construction watering on the Project Site so runoff does not impact off-site drainage facilities or receiving waters. Thus, through compliance with applicable City grading permit regulations, construction activities for the Project would not substantially alter the Project Site drainage patterns in a manner that would result in flooding on- or off-site. As such, construction-related impacts to flooding would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

As previously discussed, the Project would not result in a change in the percentage of impervious surfaces on the Project Site. In addition, under the City's LID Ordinance, post-construction stormwater runoff from new projects must be infiltrated, evapotranspirated, captured and used, and/or treated through high efficiency BMPs on site for the volume of water produced by the greater of the 85th percentile storm event or the 0.75-inch storm event (i.e., "first flush"). Consistent with LID requirements to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site, the Project would include the installation of an infiltration system BMPs as established by the LID Manual. Therefore, with implementation of BMPs the Project would not increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Operational impacts to flooding would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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. As detailed in the Hydrology Study, a comparison of the pre- and post-Project peak flow rates indicate a very slight decrease in stormwater runoff from the Project Site. In addition, the Project Site currently does not have BMPs for the management of pollutants or runoff. The BMPs implemented as part of the Project would control stormwater runoff and ultimately reduce or eliminate the discharge of potential pollutants from stormwater runoff. Furthermore, the Project would not cause flooding during a 50-year storm event or result in a permanent adverse change to the movement of surface water on the Project Site. Therefore, the Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

iv. Impede or redirect flood flows?

No Impact. The Project Site is not located within a 100-year flood hazard area as mapped by the Federal Emergency Management Agency (FEMA) or by the City.[53,54] Thus, the Project would not impede or redirect flood flows. No impacts would occur, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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

Less Than Significant Impact. As discussed above, the Project Site is not located within a 100-year flood hazard area as mapped by FEMA or by the City. In addition, given its distance from the Pacific Ocean, the Safety Element of the City of Los Angeles General Plan does not map the Project Site as being located within a tsunami hazard area. Therefore, no tsunami or tsunami events would be expected to impact the Project Site. Additionally, there are no standing bodies of water near the Project Site that may experience a seiche.

Earthquake-induced flooding can result from the failure of dams or other water-retaining structures resulting from earthquakes. The Safety Element of the City of Los Angeles General Plan maps the Project Site as being located within a potential Inundation Area, and the nearest levee is along the Los Angeles River located approximately 0.2 mile east of the Project Site. The U.S. Army Corps of Engineers operates and maintains the 22.5-mile stretch of the Los Angeles River between Lankershim Boulevard in Hollywood and Stuart and Grey Road in Downey, which includes the portion to the east of the Project Site. Their maintenance activities include inspection and cleaning of the channel walls and removing vegetation growing in cracks and joints. In addition, the U.S. Army Corps of Engineers has directed repair of damaged embankments upstream to the Project Site and has installed barriers for those portions of the channel that were identified as at greatest risk of flood waters during the 2015/2016 El Niño storm season. With continued inspection, maintenance and flood control activities, the potential for substantial adverse

[53] Federal Emergency Management Agency, Flood Insurance Rate Maps, Panel Numbers 06037C1636G, effective December 21, 2018.

[54] Los Angeles General Plan Safety Element, November 1996, Exhibit F, 100-Year & 500-Year Flood Plains, p. 57.

impacts related to inundation at the Project Site due to proximity to the Los Angeles River would be less than significant. No further evaluation of this topic in an EIR is required.

e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. Under Section 303(d) of the Clean Water Act, states are required to identify water bodies that do not meet their water quality standards. Biennially, the LARWQCB prepares a list of impaired waterbodies in the region, referred to as the 303(d) list. The 303(d) list outlines the impaired waterbody and the specific pollutant(s) for which it is impaired. All waterbodies on the 303(d) list are subject to the development of a Total Maximum Daily Load (TMDL). As discussed in the Hydrology Report, the Project Site is located within the Los Angeles River Watershed. According to the State Water Resources Control Board (SWRCB), constituents of concern listed for the Los Angeles River Watershed under California's Clean Water Act Section 303(d) List include pH, ammonia, a number of metals, coliform, trash, scum, algae, oil, chlorpyrifos as well as other pesticides, and volatile organics.

The County of Los Angeles, the City of Los Angeles, and all other cities in the Los Angeles Watershed are responsible for the implementation of watershed improvement plans or Enhanced Watershed Management Programs (EWMP) to improve water quality and assist in meeting the TMDL milestones. The objective of the EWMP Plan for the Los Angeles River is to determine the network of control measures (often referred to as best management practices) that will achieve required pollutant reductions while also providing multiple benefits to the community and leveraging sustainable green infrastructure practices.

Potential pollutants generated by the Project would be typical of commercial and office land uses and may include sediment, nutrients, pesticides, trash and debris, oil and grease, and metals. The implementation of BMPs required by the City's LID Ordinance would target these pollutants that could potentially be carried in stormwater runoff. Since the existing Project Site does not have any structural or LID BMPs to treat or infiltrate stormwater, implementation of the LID features proposed as part of the Project would result in an improvement in surface water quality runoff as compared to existing conditions. As such, the Project would not introduce new pollutants or an increase in pollutants that could conflict with or obstruct any water quality control plans for the Los Angeles River Watershed. With compliance with existing regulatory requirements and implementation of LID BMPs, the Project would not conflict with or obstruct implementation of a water quality control plan or a sustainable groundwater management plan. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is 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?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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. Would the project physically divide an established community?

Less than Significant Impact. As discussed in Section 3, Project Description, of this Initial Study, the Project Site is bound by 7th Street to the north, Santa Fe Avenue to the east, Violet Street to the south, and various public alleyways to the west, within the Central City North Community Plan Area. The Project Site is currently developed with warehouse and office uses, surface parking, and a parking structure. Properties to the north are developed with live-work units, commercial, and industrial uses. Properties to the south are developed with industrial and warehouse uses. Properties to the east are developed with multi-family residential, and industrial and warehouse uses. Properties to the west are developed with low-rise commercial and industrial uses.

The Project would demolish the on-site warehouse and office uses and surface parking areas and construct a new mixed-use development containing office, retail, and/or restaurant uses. These uses would be consistent with other office and commercial developments located adjacent to and in the general vicinity of the Project Site. All proposed development would also occur within the boundaries of the Project Site. In addition, the Project does not propose a freeway or other large infrastructure that would divide the existing surrounding community. Therefore, the Project would not physically divide an established community. Impacts related to the physical division of an established community would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

b. Would the project 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?

Potentially Significant Impact. As discussed in Section 3, Project Description, of this Initial Study, the Project requires several discretionary approvals including, but not limited to, a General Plan Amendment, a Vesting Zone and Height District Change, a Conditional Use, a Zone Variance, a Site Plan Review, and a Vesting Tentative Tract Map. The Project could potentially conflict with land use plans, policies or regulations that were adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, further evaluation of this topic in an EIR is 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?	☐	☐	☐	☒

a. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. No mineral extraction operations currently occur on the Project Site. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present, or within a mineral producing area as classified by the California Geologic Survey (CGS).[55,56,57] The Project Site is also not located within a City-designated oil field or oil drilling area.[58] Therefore, the Project, including the Future Campus Expansion Phase, would not result in the loss of availability of a mineral resource or a mineral resource recovery site. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. No mineral extraction operations currently occur on the Project Site. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present, or within a mineral producing area as classified by the CGS. The Project Site is also not located within a City designated oil field or oil drilling area. Therefore, the Project, including the Future Campus Expansion Phase, would not result in the loss of availability of a mineral resource or a mineral resource recovery site. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

---

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

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

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

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

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?	☐	☐	☐	☒

a. Would the project result in 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?

Potentially Significant Impact. During construction activities associated with the Project, the use of heavy equipment (e.g., bulldozers, backhoes, cranes, loaders, etc.) would generate noise on a short-term basis. In addition, noise levels from on-site sources may increase during operation of the Project, including the Future Campus Expansion Phase. Furthermore, additional vehicle trips attributable to the Project has the potential to increase noise levels along adjacent roadways. Therefore, further evaluation of this topic will be provided in the EIR.

b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Potentially Significant Impact. Construction of the Project could generate groundborne noise and vibration associated with demolition, site grading and excavation, other clearing activities, the installation of building footings, and construction truck travel. As such, the Project, including the Future Campus Expansion Phase, would have the potential to generate excessive groundborne vibration and noise levels during short-term construction activities. Therefore, further evaluation of this topic will be provided in the EIR. Due to the proposed land uses and vibration characteristics (rapid attenuation based on distance from source), operation of the Project would not be anticipated to result in operational vibration impacts. Nevertheless, this topic will be discussed further in the EIR.

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. The Project Site is not located in the vicinity of a private airstrip, an airport land use plan, or within 2 miles of an airport. The closest airport to the Project Site is LAX, located approximately 12 miles southwest of the Project Site. As such, the Project, including the Future Campus Expansion Phase, would not expose people residing or working in the Project area to excessive noise levels. Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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. Would the project 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. The Project is a commercial development consisting of office, retail, and/or restaurant uses. Since the Project, including the Future Campus Expansion Phase, does not propose a housing component, it would not directly induce a new residential population that would contribute to population growth in the vicinity of the Project Site. Additionally, while construction of the Project would create temporary construction-related jobs, the work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, Project-related construction workers would not be anticipated to relocate their household's place of residence as a consequence of working on the Project and, therefore, no new permanent residents would be generated during construction of the Project.

Operation of the Project would generate new employment positions, which could result in increased population growth in the area. As discussed in Section 3, Project Description, of this Initial Study, the Project includes the development of a 13-story 450,599 square-foot building featuring 435,100 square feet of office uses and 15,499 square-feet of ground floor retail and/or restaurant uses. Additionally, the Applicant is requesting a Floor Area Averaging Conditional Use Permit which would allow the remaining

211,201 square feet of floor area to be averaged across the entire Project Site as a Unified Development. Accordingly, the Project includes a Future Campus Expansion Phase which encompasses a potential expansion opportunity for additional office use to be developed within the Project Site at the corner of Violet Street and Santa Fe Avenue.[59] This potential future expansion would be located on Lot 4 of the Project Site at the corner of Violet Street and Santa Fe Avenue. For purposes of this analysis, this Future Phase is assumed to be office, but could be utilized for any uses consistent with the current M3-1-RIO zoning. Lot 1 is currently occupied with approximately 25,798 square feet of warehouse uses, 9,940 square feet of office uses, and associated surface parking which would be removed as part of the Project and Lot 4 is currently developed with a 21,880 square foot warehouse building which would be removed as part of the Future Campus Expansion Phase. The remaining portion of the Project Site is developed with the 244,795 square foot Warner Music Group building and a parking garage which would be retained. Based on employee generation rates promulgated by the City of Los Angeles VMT Calculator Documentation, the Project's net increase in floor area of 626,062 square feet, including the Future Campus Expansion Phase, would generate approximately 2,634 net new employees.[60,61] As noted above, the Project would not introduce new homes at the Project Site and would therefore not result in a direct population growth in the area. While some of the new employment positions could be filled by persons who would relocate to the vicinity of the Project Site, this potential increase in population would not be substantial since not all employees would move close to the Project Site. Specifically, some employment opportunities may be filled by people already residing in the vicinity of the Project Site and other persons would commute to the Project Site from other communities in and outside of the City.

According to SCAG's 2020–2045 RTP/SCS, an estimated 1,947,472 employees are projected within the City of Los Angeles in 2026, the Project's buildout year, with 49,586 new employees between 2021 and 2026, representing an increase of 2.61% over 2021 conditions.[62] Including the future phase, the Project would represent 0.14 percent of the total number of employees in 2026 and 5.31 percent of the employment growth between 2021 and 2026. As noted above, the Project would not introduce new homes at the Project Site and would therefore not result in a direct population growth in the area and the number of jobs would be consistent with SCAG's 2020-2045 RTP/SCS projection. While some of the new employment positions could be filled by persons who would relocate to the vicinity of the Project Site, this potential increase in population would not be substantial since not all employees would move close to the Project Site. Specifically, some employment opportunities may be filled by people already residing in the vicinity of the Project Site and other persons would commute to the Project Site from other communities in and outside of the City. Therefore, given that the Project would not directly contribute to substantial population growth in the Project area through the development of residential uses and as some of the employment opportunities generated by the Project would be filled by people already residing in the

---

59 A 6:1 FAR within the Development Site would permit 661,800 square feet. Following the development of the 450,599 square foot building, 211,201 square feet would remain available for a future phase.

60 Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, May 2020, Table 1. Based on the "General Office" employee generation rate of 4 employees per 1,000 square feet applied to the proposed (435,100 square feet), existing (9,940 square feet), and future (211,201 square feet) office uses, the "warehouse" employee generation rate of 0.33 employees per 1,000 square feet applied to the existing (25,798 square feet) warehouse uses to be removed, and the "Fast-Food Restaurant" employee generation rate of 6.7 employees per 1,000 square feet applied to the proposed (15,499 square feet) retail and/or restaurant uses.

61 Conservatively assumes 100% of the retail and/or restaurant uses would be restaurant.

62 According to SCAG's 2020–2045 RTP/SCS, the forecasted number of employees for the City of Los Angeles Subregion in 2021 is approximately 1,897,886 employees (based on a linear interpolation of 2016–2045 data). In 2026, the City of Los Angeles Subregion is anticipated to have approximately 1,947,472 employees (based on a linear interpolation of 2016–2045 data).

vicinity of the Project Site or who would commute to the Project Site, the potential growth associated with Project employees who may relocate their place of residence would not be substantial. Further, as the Project would be located in a highly developed area with an established network of roads and other urban infrastructure, the Project would not require the extension of such infrastructure in a manner that would indirectly induce substantial population growth.

Overall, the provision of new jobs would constitute a small percentage of employment growth and would not be considered "unplanned growth" and would not produce such a high quantity of new jobs that it would have the possibility to induce unplanned residential growth. Therefore, the Project would not cause an exceedance of SCAG's employment projections or induce substantial indirect population or housing growth related to Project-generated employment opportunities. As such, given that the Project would not directly contribute to substantial unplanned population growth in the Project area through the development of residential uses and as some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site or who would commute, the potential growth associated with Project employees who may relocate their place of residence would not be substantial. Further, as the Project would be located in a highly developed area with an established network of roads and other urban infrastructure, the Project would not require the extension of such infrastructure in a manner that would indirectly induce substantial population growth.

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

b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Other public facilities?	☐	☐	☒	☐

a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services?

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

b. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services?

Potentially Significant Impact. Police protection for the Project Site is provided by the LAPD. The Project would increase the total on-site square footage and number of employees the Project Site, which could result in the need for additional police services. Therefore, the EIR will provide further analysis of this issue.

c. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools?

Less Than Significant Impact. The Project Site is located within the boundaries of the Los Angeles Unified School District (LAUSD).The Project Site is currently served by one elementary school (9th Street Elementary), one middle school (Hollenbeck Middle School), and two high schools as part of the Boyle Heights Zone of Choice High Schools (Theodore Roosevelt High School and Felicitas and Gonzalo Mendez High School).[63] While the Project does not include the development of residential units, the proposed commercial development could result in an increase in the number of students within the service area of LAUSD. Specifically, based on LAUSD Student Generation rates, the Project, including would result in approximately 388 net new elementary students, 107 net new middle school students, and 223 net new high school students in the project area, for a total of approximately 718 net new

[63] Los Angeles Unified School District, Residential School Identifier, http://rsi.lausd.net/ResidentSchoolIdentifier/, accessed April 22, 2021.

students.[64,65] As such, the Project would create new demand for capacity at the LAUSD schools that serve the Project Site. It should be noted, however, that this analysis does not include LAUSD options that would allow students generated by the Project to enroll at other LAUSD schools located away from their home attendance area, or students who may enroll in private schools or participate in home-schooling. In addition, this analysis does not account for Project residents, who may already reside in the school attendance boundaries and would move to the Project Site.

Furthermore, pursuant to SB 50, the Applicant would be required to pay development fees for schools to LAUSD prior to the issuance of building permits. Pursuant to Government Code Section 65995, the payment of these fees is considered mitigation of Project-related. Therefore, payment of the applicable development school fees to LAUSD would offset the potential impact of additional student enrollment at schools serving the Project Site. Overall, the Project, including the Future Campus Expansion Phase, would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities (i.e., schools), need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools. Therefore, the Project's impact on schools would be less than significant, and no mitigation measures are required. No further analysis of this issue in an EIR is required.

d. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for park services?

Less Than Significant Impact.

Parks and recreational facilities in the vicinity of the Project Site are primarily operated and maintained by the Los Angeles Department of Recreation and Parks. There are 30 parks and recreation facilities within a 2-mile radius of the Project Site. The nearest parks and recreation facilities include the following: Arts District Park (located 0.65 mile northwest of the Project Site); Gladys Park (located 0.84 mile northwest of the Project Site); Boyle Heights Sports Center (located 0.95 mile southeast of the Project Site); and Hollenbeck Park, Lake, Skate Park, and Recreation Center (located 1.02 miles northeast of the Project Site).[66]

As previously discussed, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in on-site residents who would utilize nearby parks and/or recreational facilities. Additionally, the new employment opportunities that would be generated by the Project may be filled, in part, by employees already residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities. Therefore, only a fraction of the new employees generated by the Project could create a demand for parks. While it is possible that some of these

---

64 Los Angeles Unified School District, 2020 Developer Fee Justification Study, March 2020, Table 15.

65 Conservatively applies the Standard Commercial Office rate of 1.128 students per 1,000 square feet to the entire Project.

66 City of Los Angeles Department of Recreation and Parks, Facility Map Locator, www.laparks.org/maplocator?cat_id=All&geo[radius]=2&geo[latitude]=34.032855&geo[longitude]=-118.2307789&address=2045%20Violet%20St,%20Los%20Angeles,%20CA%2090021,%20USA, accessed June 23, 2021.

employees may utilize local parks and recreational facilities, such use would be anticipated to be limited due to work obligations and the amount of time it would take for employees to access off-site local parks. In addition, Project employees would be more likely to use parks near their homes during non-work hours. Furthermore, the Project proposes on-site outdoor amenities such as landscaped terraces with seating for use by employees, reducing the likelihood employees would use local parks. Specifically, as noted above, the Project would provide approximately 74,018 square feet of outdoor areas. Therefore, the Project, including the Future Campus Expansion Phase, would not result in substantial adverse physical impacts associated with the provision of new or physically altered parks or the need for new or physically altered parks. Impacts would be less than significant, and no mitigation measures are required. No further analysis of the issue in an EIR is required.

e. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities?

Less Than Significant Impact.

The Los Angeles Public Library (LAPL) provides library services to the City through its Central Library, eight regional branch libraries, and 64 neighborhood branch libraries, as well as through Web-based resources. The Project area is served by existing LAPL facilities including the Little Tokyo Branch Library (1.6 miles northwest) and the Los Angeles Central Library (2.2 miles northwest). As previously discussed, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in a direct increase in the number of residents within the service population of the local LAPL facilities. As discussed above, based on employee generation rates promulgated by the City of Los Angeles VMT Calculator Documentation,[67] the Project, including the Future Campus Expansion Phase, would generate approximately 2,634 net new employees. Project employees would have internet access to LAPL and other web-based resources, decreasing the demand on library facilities. Furthermore, as Project employees would be more likely to use library facilities near their homes during non-work hours and given that some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site, Project employees and the potential indirect population generation that could be attributable to those employees would generate minimal demand for library services. Therefore, impacts on library facilities would be less than significant, and no mitigation measures are required. No further analysis of this issue in an EIR is required.

[67] Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, May 2020, Table 1. Based on the "General Office" employee generation rate of 4 employees per 1,000 square feet applied to the proposed (435,100 square feet), and existing (9,940 square feet), and future (211,201 square feet) office uses, the "warehouse" employee generation rate of 0.33 employees per 1,000 square feet applied to the existing (25,798 square feet) warehouse uses to be removed, and the "Fast-Food Restaurant" employee generation rate of 6.7 employees per 1,000 square feet applied to the proposed (15,499 square feet) retail and/or restaurant uses.

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?	☐	☐	☐	☒

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

Less Than Significant Impact. As discussed in the Response to Checklist Question XV(d) above, the Project does not propose the development of residential uses which would create a demand on nearby parks and/or recreational facilities. Additionally, the new employment opportunities that would be generated by the Project may be filled, in part, by employees already residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities. Therefore, only a fraction of the new employees generated by the Project could create a demand for parks and recreational facilities. While it is possible that some of these employees may utilize local parks and recreational facilities, such use would be anticipated to be limited due to work obligations and the amount of time it would take for employees to access off-site local parks and recreational facilities. The Project would also provide on-site outdoor areas. Specifically, the Project would provide approximately 74,018 square feet of outdoor areas. In addition, Project employees would be more likely to use parks near their homes during non-work hours. Therefore, the Project, including the Future Campus Expansion Phase, would not substantially increase the demand for off-site public parks and recreational facilities such that substantial physical deterioration of those facilities would occur or be accelerated. The impact on parks and recreational facilities would be less than significant, and mitigation measures would not be required. No further evaluation of this topic in an EIR is required.

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

No Impact. The Project does not include recreational facilities or any residential uses and therefore would not result in any direct substantial population growth that would increase use of existing recreational facilities. Therefore, the Project, including the Future Campus Expansion Phase, would not necessitate construction of new recreational facilities. Therefore, no impact would occur, and no mitigation measures would be required. No further evaluation of this topic in an EIR is 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?	☐	☐	☒	☐

a. Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Potentially Significant Impact. A Transportation Assessment (TA) in accordance with LADOT's Transportation Assessment Guidelines (TAG) adopted in July 2019 and updated in July 2020 will be prepared for the Project. In accordance with the TAG and consistent with the City CEQA Transportation Thresholds (adopted July 30, 2019), the TA's CEQA-required analyses will include an assessment of whether the Project would result in potential conflicts with transportation-related plans, ordinances, or policies. The results of the TA and further analysis of the Project, including the Future Campus Expansion Phase, will be included in the EIR.

b. Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Potentially Significant Impact. 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 has shifted from driver delay, which is 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, creation of a multi-modal transportation, and promotion of mixed-use developments. CEQA Guidelines Section 15064.3 states that vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts, replacing LOS. The Project, including the Future Campus Expansion Phase, would develop new office, retail, and/or restaurant uses on the Project Site. As a result, VMT would increase over existing conditions. Therefore, further analysis of this issue will be provided in the EIR.

c. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact. The Project's design does not include hazardous geometric design features (e.g., sharp curves or dangerous intersections). The roadways adjacent to the Project Site are part of the urban roadway network and contain no sharp curves or dangerous intersections, and the development of the Project would not result in roadway improvements such that safety hazards would be introduced adjacent to the Project Site. In addition, the proposed driveways along 7th Place and Violet Street would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access. The Project includes two vehicular access points. Access to the parking garage and loading dock would be provided via 7th Place which would serve as a drive aisle for access to both existing and proposed parking. The Project also includes a rideshare drop-off area with two curb cuts along Violet Street. In total, as part of the Project, one curb cut would be closed and two would be added, for a net increase of one. The proposed driveways and access points would not create hazards to the surrounding streets. The proposed uses would also be consistent with the surrounding uses (i.e., residential and commercial) and would not introduce hazards due to incompatible uses. Thus, the Project, including the Future Campus Expansion Phase, would not substantially increase hazards due to a geometric design feature or incompatible uses. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

d. Would the project result in inadequate emergency access?

Less Than Significant Impact. As noted above, according to the Safety Element of the City of Los Angeles General Plan, the nearest disaster routes to the Project Site are the Hollywood Freeway (US-101), the Santa Monica Freeway (I-10), and the Golden State Freeway (I-5), which are all accessible within less than 1 mile of the Project Site. Alameda Street is also a designated disaster route located approximately 0.5 mile east of the Project Site. While it is expected that the majority of construction activities for the Project would primarily be confined on-site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. With regard to operation, the Project does not propose the permanent closure of any local public streets and primary access to the Project Site would continue to be provided from the surrounding streets. In addition, the Project would comply with LAFD access requirements and applicable LAFD regulations regarding safety. Therefore, the Project would not result in inadequate emergency access to the Project Site or surrounding uses. Impacts regarding inadequate emergency access would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

XVIII. TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☒	☐	☐	☐
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☒	☐	☐	☐

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)?

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 (a and b). AB 52 established a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in PRC Section 21074, which is part of the CEQA statute. As specified in AB 52, a lead agency must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and

the lead agency must begin the consultation process within 30 days of receiving the request for consultation.

As noted above, the Project would require excavations up to 45 feet below grade. Therefore, the potential exists for the Project to significantly impact a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe. In compliance with AB 52, the City will notify all applicable tribes, and the City will participate in any requested consultations for the Project. Further analysis of this topic will be provided in the EIR.

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?	☒	☐	☐	☐
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?	☐	☐	☒	☐

a. Would the project 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?

Potentially Significant Impact (Water, Electric Power, and Natural Gas)/Less Than Significant Impact (Wastewater, Stormwater, and Telecommunications Facilities). Water, wastewater, electric power, and natural gas systems consist of two components, the source of the supply or place of treatment

(for wastewater), and the conveyance systems (i.e., distribution lines and mains) that link the location of these facilities to an individual development site. Given the Project's increase in the amount of developed floor area on the Project Site and the potential corresponding increase in water, electricity, and natural gas demand, further analysis of these topics in an EIR will be provided.

Wastewater and telecommunications facilities are analyzed below. Stormwater is analyzed under Section X, Hydrology and Water Quality, above.

Wastewater

The analysis of wastewater is based on the Wastewater Report prepared for the Project by KHR Associates on July 23, 2021 which is included as Appendix IS-7 of this Initial Study.

Wastewater generated by the Project would be conveyed via the existing wastewater conveyance systems for treatment at the Hyperion Water Reclamation Plant (HWRP). The HWRP has a capacity of 450 million gallons per day (mgd),[68] and current average wastewater flows are at approximately 275 mgd.[69] Accordingly, the remaining available capacity at the HWRP is approximately 175 mgd. As shown in Table 2 on page 83, the Project would generate a net increase in wastewater flow from the Project Site of approximately 134,199 gallons per day (gpd), or approximately 0.13 mgd. The Project's increase in average daily wastewater flow of 0.13 mgd would represent approximately 0.07 percent of the current estimated 175 mgd of remaining available capacity at the HWRP. Therefore, the Project-generated wastewater would be accommodated by the existing capacity of the HWRP. Furthermore, wastewater flows would be typical of office and commercial developments which are currently treated by HWRP and no industrial discharge into the wastewater system would occur. Furthermore, discharge of effluent from the HWRP into Santa Monica Bay is also regulated by permits issued under the NPDES and is required to meet Los Angeles Regional Water Quality Control Board (LARWQCB) requirements. As LA Sanitation (LASAN) monitors the treated wastewater, and because the wastewater generated by the Project would be similar to wastewater currently treated at HWRP, wastewater generated from the Project Site would not exceed wastewater treatment requirements of LARWQCB.

The Project is anticipated to utilize existing sewer infrastructure. Wastewater service for the Project Site is provided by LASAN through a sanitary sewer main system in the surrounding streets. Record data provided by the City reflects that there is an existing 8-inch vitrified clay pipe (VCP) sewer main at the centerline in Violet Street, an 8-inch VCP sewer main at the centerline in 7th Place, and a 10-inch VCP at the centerline in Santa Fe Avenue. There is also an existing 132-inch reinforced concrete pipe North Outfall Sewer – East Central Interceptor Sewer to the east of and parallel to the existing 10-inch VCP sewer main in Santa Fe Avenue. The 8-inch main in Violet Street has a 50-percent design capacity of 229,300 gpd, the 8-inch main in 7th Place has a 50-percent design capacity of 283,200 gpd, and the 10-inch main in Santa Fe Avenue has a 50-percent design capacity of 416,000 gpd. LASAN has analyzed the local sewer conditions based on available gauging information and forecasted growth to

[68] LASAN, Water Reclamation Plants, Hyperion Water Reclamation Plant, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=vm8qwyj80_4&_afrLoop=18606279438697733#!, accessed March 9, 2021.

[69] LASAN, Water Reclamation Plants, Hyperion Water Reclamation Plant, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=vm8qwyj80_4&_afrLoop=18606279438697733#!, accessed March 9, 2021.

Table 2
Estimated Project Wastewater Generation

Land Use	Floor Area	Wastewater Generation Rate (gpd/unit)[a]	Wastewater Generation (gpd)
EXISTING			
Warehouse (Lot 1)	25,798 sf	0.03 gpd/sf	774
Office (Lot 1)	9,940 sf	0.120 gpd/sf	1,193
Office (Lot 4)	21,880 sf	0.03 gpd/sf	656
Existing Subtotal			2,623
PROPOSED			
Office	435,100 sf	0.170 gpd/sf	73,967
Restaurant	775 seats	30 gpd/seat	23,250
Outdoor Areas	74,018 sf	0.05 gpd/sf	3,701
Office (Future Campus Expansion Phase)	211,201 sf	0.170 gpd/sf	35,904
Proposed Wastewater Generation			**136,822**
Less Existing to Be Removed			*(2,623)*
Net Additional Wastewater Generation (Proposed – Existing to Be Removed)			**134,199**

sf = square feet

gpd = gallons per day

[a] *Wastewater generation rates are based on 2012 LASAN Sewer Generation Rates.*

Source: LASAN, July 12, 2021. Refer to Appendix IS-7 of this Initial Study.

evaluate if available capacity exists for the Project. According to the WWSI, LASAN concluded that "it appears the sewer system might be able to accommodate the total flow" for the Project, which was determined to be 136,822 gpd prior to the removal of the existing uses. Based on this new sewer construction is not expected. However, further detailed gauging and evaluation will be required, including identifying exact points of connection and confirming available capacity via a Sewer Capacity Availability Request (SCAR). A SCAR analyzes the existing sewer collection system to determine if adequate capacity exists in the sewer collection system to safely convey the newly generated sewage to the appropriate sewage treatment plant. The results of the SCAR are valid for 180 days from the date of the sewer capacity approval from LASAN. The SCAR serves as a clearance process required for sewer connection permits.

In addition, Project-related sanitary sewer connections and on-site infrastructure would be designed and constructed in accordance with applicable LASAN and California Plumbing Code standards. In the event any new sewer connections or upgrades are required following the SCAR, construction of these facilities would be included in the overall construction of the Project. Therefore, the Project would not cause a measurable increase in wastewater flows at a point where, and at a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained.

Based on the above, the Project would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects. Therefore, impacts would be less than significant, and mitigation measures are not required. No further analysis of this topic in an EIR is required.

Stormwater

With regard to stormwater drainage, as discussed above in Checklist Question X, Hydrology and Water Quality, the Project would result in a decrease in stormwater flows. As such, the Project would not require or result in the relocation or construction of new or expanded storm water drainage.

Telecommunications Infrastructure

With regard to telecommunications infrastructure, the Project would require construction of new on-site telecommunications infrastructure to serve the new building and potential upgrades and/or relocation of existing telecommunications infrastructure. Construction impacts associated with the installation of telecommunications infrastructure would primarily involve trenching in order to place the lines below surface. Such activities could involve temporary closure of portions of sidewalks or travel lanes. However, the Project, including the Future Campus Expansion Phase, would implement a construction management plan during construction, which would ensure safe pedestrian access, as well as emergency vehicle access and safe vehicle travel in general, to reduce any temporary pedestrian and traffic impacts occurring as a result of construction activities. In addition, when considering impacts resulting from the installation of any required telecommunications infrastructure, all impacts are of a relatively short duration (i.e., months) and would cease to occur when installation is complete. Installation of new telecommunications infrastructure would be limited to on-site telecommunications distribution with minor off-site work associated with connections to the public system. No upgrades to off-site telecommunications systems are anticipated. Any work that may affect services to the existing energy and telecommunications lines would be coordinated with service providers and the City, as applicable. Therefore, related impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

b. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Potentially Significant Impact. LADWP supplies water to the Project Site. Given the Project's proposed uses, including the Future Campus Expansion Phase, and increase in the amount of developed floor area on the Project Site, the Project would result in an increased demand for water provided by LADWP. In addition, the Project would meet certain criteria outlined in Section 10912 of the California Water Code requiring the preparation of a Water Supply Assessment by LADWP. Therefore, further analysis of this issue will be provided in the EIR.

c. Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. As shown in Table 2 on page 83, the Project would generate a net increase in wastewater flow from the Project Site of approximately 134,199 gpd, or approximately

0.13 mgd. The Project's increase in average daily wastewater flow of 0.13 mgd would represent approximately 0.07 percent of the current 175 mgd of remaining available capacity of the HWRP.[70] Therefore, wastewater generated by the Project would be accommodated by the existing capacity of the HWRP.

Various factors, including future development of new treatment plants, upgrades and improvements to existing treatment capacity, development of new technologies, etc., will ultimately determine the available capacity of the Hyperion Service Area in 2026, the year by which construction of the Project is expected to be completed. Planned upgrades would provide for improvements beyond 2040 to serve future population needs. However, it is conservatively assumed that no new improvements to the wastewater treatment plants would occur prior to 2026. Thus, based on this conservative assumption, the capacity of the HWRP in 2025 would continue to be 450 mgd.

Based on LASAN's average flow projections for the HWRP, it is anticipated that average flows in 2026, the Project build-out year, would be approximately 267.4 mgd.[71] Accordingly, the future remaining available capacity in 2026 would be approximately 182.6 mgd.[72] The Project's increase in average daily wastewater flow of 0.13 mgd would represent approximately 0.07 percent of the estimated future remaining available capacity of 182.6 mgd at the HWRP.[73] Therefore, wastewater generated under the Project would be accommodated by the future capacity of the HWRP.

Additionally, the Project's net increase in average daily wastewater generation of 0.13 mgd plus the current average flows of approximately 275 mgd to the HWRP would represent approximately 61.1 percent[74] of the HWRP's capacity of 450 mgd. With regard to future flows, the Project's net increase of 0.13 mgd plus the projected flows of approximately 267.4 mgd to the HWRP would also represent approximately 59.5 percent[75] of the HWRP's assumed future capacity of 450 mgd.

Based on the above, there is adequate treatment capacity to serve the Project's projected demand in addition to existing LASAN commitments. As such, the Project would 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. Impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

---

70 (0.13 mgd / 175 mgd) x 100 = 0.07%

71 Los Angeles Department of Water and Power, One Water LA 2040 Plan—Volume 2, Table ES.1, Projected Wastewater Flows. Based on a straight-line interpolation of the projected flows for the Hyperion Water Reclamation Plant for 2020 (approximately 256 mgd) and 2030 (approximately 275 mgd). The 2026 value is extrapolated from 2020 and 2030 values: [(275 mgd – 256 mgd) ÷ 10) * 6] + 256 = ~ 267.4 mgd.

72 450 mgd – 267.4 mgd = 182.6 mgd

73 (0.13 mgd ÷ 182.6 mgd) x 100 = 0.07 (~0.07%)

74 [(0.13 mgd + 275 mgd) ÷ 450 mgd] x 100 = 61.12 (~ 61.1%)

75 [(0.13 mgd + 267.4 mgd) ÷ 450 mgd] x 100 = 59.45 (~ 59.5%)

d. Would the project 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. While the Bureau of Sanitation generally provides waste collection services to single-family and some small multi-family developments, private haulers permitted by the City provide waste collection services for most multi-family residential and commercial developments within the City. Solid waste transported by both public and private haulers is either recycled, reused, or transformed at a waste-to-energy facility, or disposed of at a landfill. Landfills within the County are categorized as either Class III or inert waste landfills. Non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste such as construction waste, yard trimmings, and earth-like waste are disposed of in inert waste landfills.[76] Nine Class III landfills and one inert waste landfill with solid waste facility permits are currently serving the County.[77] In addition, there is one solid waste transformation facility within Los Angeles County that converts, combusts, or otherwise processes solid waste for the purpose of energy recovery.

Based on the 2019 Countywide Integrated Waste Management Plan (CoIWMP) Annual Report, the most recent report available, the total amount of solid waste disposed of at in-county Class III landfills, transformation facilities, and exports to out-of-County landfills was 10.70 million tons in 2019. The total remaining permitted Class III landfill capacity in the County is estimated at 148.40 million tons, with a total estimated daily disposal rate of 34,305 tons per day, and the remaining lifespan of each landfill ranges from 9 to 36 years. In addition, the permitted inert waste landfill serving the County is Azusa Land Reclamation. This facility has 58.84 million tons of remaining capacity and an average daily in-County disposal rate of 854 tons per day.[78] Los Angeles County continually evaluates landfill disposal needs and capacity through preparation of the CoIWMP Annual Reports. Within each annual report, future landfill disposal needs over the next 15-year planning horizon are addressed in part by determining the available landfill capacity.[79]

The following analysis quantifies the Project's construction and operation solid waste generation, including the Future Campus Expansion Phase.

Construction

Lot 1 of the Project Site is currently occupied with approximately 25,798 square feet of warehouse uses and 9,940 square feet of office uses and associated surface parking which would be removed as part of the Project and Lot 4 is currently developed with a 21,880 square foot warehouse building that would be

---

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

[77] County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020. The 9 Class III landfills serving the County include the Antelope Valley Landfill, the Burbank Landfill, the Calabasas Landfill, Chiquita Canyon Landfill, Lancaster Landfill, Pebbly Beach Landfill, Savage Canyon Landfill, the Scholl Canyon Landfill, and the Sunshine Canyon City and County Landfill. Azusa Land Reclamation is the only permitted Inert Waste Landfill in the County that has a full solid waste facility permit.

[78] County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020.

[79] County of Los Angeles, Department of Public Works. Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020.

removed as part of the Future Campus Expansion Phase. The remaining portion of the Project Site is developed with the 244,795 square-foot Warner Music Group building and a parking garage which would be retained. The Project includes the development of a new 13-story, 450,599 square-foot building featuring 435,100 square feet of office uses, 15,499 square-feet of ground floor retail and/or restaurant uses, and 1,264 automobile parking spaces in one at-grade, three above-grade, and four below-grade parking levels within Lot 1. The Project also requests additional floor area to be averaged over the "Unified Development" via a floor averaging conditional use. Specifically, with a proposed FAR of 6:1 for the Development Site, 211,201 square feet of remaining floor area would be permitted as a future phase.[80] This Future Campus Expansion Phase would be located on Lot 4 at the corner of Violet Street and Santa Fe Avenue. As noted above, for purposes of this analysis, this Future Campus Expansion Phase is assumed to be office, but could be utilized for any uses consistent with the current M3-1-RIO zoning. As shown in Table 3 on page 88, based on construction and debris rates established by the USEPA, it is anticipated that construction of the Project, including the Future Campus Expansion Phase, would generate a total of approximately 9,103 tons of demolition debris and 2,871 tons of construction debris, for a combined total of 11,974 tons of construction-related waste.

Pursuant to the requirements of SB 1374, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Furthermore, pursuant to LAMC Sections 66.32 through 66.32.5 (Ordinance No. 181,519), the Project's construction contractor would be required to deliver all remaining construction and demolition waste generated by the Project to a certified construction and demolition waste processing facility. Thus, although the total diversion rate may ultimately exceed 75 percent, this analysis conservatively assumes a diversion rate of 75 percent. Materials that could be recycled or salvaged include asphalt, glass, and concrete. Debris not recycled could be accepted at the unclassified landfill (Azusa Land Reclamation) within Los Angeles County and within the Class III landfills open to the City. As shown in Table 3, after accounting for mandatory recycling, the Project would result in approximately 2,994 tons of construction-related waste in the County's permitted inert landfill (i.e., Azusa Land Reclamation Landfill) throughout the construction period. This amount of construction and debris waste would represent approximately 0.005 percent of the Azusa Land Reclamation Landfill's existing remaining disposal capacity of 58.84 million tons. Thus, the total amount of construction and demolition waste generated by the Project would represent a small fraction of the remaining capacity at this permitted inert landfill serving Los Angeles County. Given the remaining permitted capacity at the Azusa Land Reclamation facility as well as the remaining 148.40 million tons of capacity at the Class III landfills serving the County, the landfills serving the Project Site would have sufficient capacity to accommodate the Project's construction solid waste disposal needs.

Operation

As shown in Table 4 on page 89, upon full buildout, the Project would result in a net increase in solid waste generation of 1,209 tons per year. The estimated solid waste is conservative because the waste generation factors used do not account for recycling or other waste diversion measures such as compliance with AB 341, which requires California commercial enterprises and public entities that generate four cubic yards or more per week of waste, and multi-family housing with five or more units, to

[80] A 6:1 FAR within the Development Site would permit 661,800 square feet. Following the development of the 450,599 square foot building, 211,201 square feet would remain available for a future phase.

Table 3
Project Demolition and Construction Waste Generation

Building	Size	Generation Rate (lbs/sf)[a,b]	Total (tons)[b]
Demolition Waste			
Existing Structures to be Removed	57,618 sf	158	9,103
Demolition Waste Subtotal			*9,103*
Construction Waste			
Office	435,100 sf	4.34	1,888
Retail/Restaurant	15,499 sf	4.34	67
Office (Future Phase)	211,201 sf	4.34	916
Construction Waste Subtotal			*2,871*
Total for Demolition and Construction Waste			***11,974***
Total After 75-Percent Recycling			**2,994**

lbs = pound

sf = square feet

[a] *U.S. Environmental Protection Agency, Report No. EPA530-R-09-002, Estimating 2003 Demolition and Materials Amounts, March 2009, Table A-2 and Table 2-4. Generation rates used in this analysis are based on an average of individual rates assigned to specific building types.*

[b] *Used conversion of 1 ton = 2,000 pounds. Numbers have been rounded.*

Source: Eyestone Environmental, 2021.

adopt recycling practices. Likewise, the analysis does not include implementation of the City's Zero Waste Plan, which is expected to result in a reduction of landfill disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent by the year 2025.[81] The estimated annual net increase in solid waste that would be generated by the Project of 1,209 tons represents approximately 0.0008 percent of the remaining capacity (148.40 million tons) for the County's Class III landfills serving the County.[82]

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

[81] LA Sanitation, Solid Waste Integrated Resources Plan, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-zwswirp?_afrLoop=3608041245788654&_afrWindowMode=0&_afrWindowId=null&_adf.ctrl-state=8vrc5bges_179#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D3608041245788654%26_afrWindowMode%3D0%26_adf.ctrl-state%3D8vrc5bges_183, accessed April 15, 2021.

[82] (1,228 tons per year/148.8 million tons) x 100 ≈ ˜0.0008%

Table 4
Estimated Project Solid Waste Generation

Building	Size	Employee Generation Rate per sf[a]	Estimated No. of Employees	Solid Waste Generation Rate[b]	Total Generation (tons/year)
Existing					
Office	9,940 sf	0.004	40 emp	0.37 ton/year	15
Warehouse	47,678 sf	0.00033	16 emp	2.72 tons/years	44
Total Existing					**59**
Proposed					
Office	435,100 sf	0.004	1,741 emp	0.37 ton/year	645
Retail/Restaurant[c]	15,499 sf	0.002	104 emp	2.98 tons/years	310
Office (Future Phase)	211,201 sf	0.004	845 emp	0.37 ton/year	313
Total with Implementation of Project					**1,268**
Total Net Increase					**1,209**

emp = employees

sf = square feet

[a] *Employee Generation Rates from City of Los Angeles VMT Calculator Documentation, May 2020, Table 1.*

[b] *City of Los Angeles Bureau of Sanitation, City Waste Characterization and Quantification Study, Table 4, July 2002. Assumes services—business rate for office; retail—restaurants for retail; and wholesale trade—non-durable goods for warehouse.*

[c] *Conservatively assumes 100% of the retail and/or restaurant uses would be fast food.*

Source: Eyestone Environmental, 2021.

e. Would the project 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. Furthermore, AB 341, which became effective on July 1, 2012, requires businesses and public entities that generate four cubic yards or more of waste per week and multi-family dwellings with five or more units, to recycle. The purpose of AB 341 is to reduce greenhouse gas emissions by diverting commercial solid waste from landfills and expand opportunities for recycling in California. In addition, in March 2006, the Los Angeles City Council adopted RENEW LA, a 20-year plan with the primary goal of shifting from waste disposal to resource recovery within the City, resulting in "zero waste" by 2030. The plan also calls for reductions in the quantity and environmental impacts of residue material disposed in landfills. In October 2014,

Governor Jerry Brown signed AB 1826, requiring businesses to recycle their organic waste[83] 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 were required to arrange for organic waste recycling services. In addition, beginning January 1, 2017, businesses that generate four cubic yards of organic waste per week were required to arrange for organic waste recycling services.

The Project would 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.[84] 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 management and reduction statutes and regulations related to solid waste, impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

XX. WILDFIRE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, 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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

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

[84] Ordinance No. 171,687, adopted by the Los Angeles City Council on August 6, 1997.

a. Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

b. Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

c. Would the project 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?

d. Would the project 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?

No Impact (a-d). As noted above, the Project Site is located in an urbanized area, and there are no wildlands located in the vicinity of the Project Site. The Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. Therefore, these thresholds would not apply to the Project. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone,[85] nor is it located within a City-designated fire buffer zone.[86] Therefore, no impacts regarding wildfire risks would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is 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?	☒	☐	☐	☐

[85] City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5166014001, 5166014003, and 5166014012, http://zimas.lacity.org/, accessed April 15, 2021.

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

	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?

Potentially Significant Impact. As discussed above, the Project Site is located in a highly urbanized area and does not serve as habitat for fish or wildlife species. In addition, no sensitive plant or animal community or special status species occur on the Project Site. Therefore, the Project would not 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.

As discussed above, the Project's potential impacts to historic and archaeological resources will be evaluated in the EIR. Environmental impacts for the following subject areas will also be further analyzed in the EIR: air quality (conflicts with plans, criteria pollutants, and sensitive receptors); cultural (historic and archeological resources) energy; greenhouse gas emissions; land use and planning (conflicts with plans); noise; public services (fire protection and police protection); transportation (conflicts with plans and VMT); tribal cultural resources; and utilities and service systems (water and energy infrastructure).

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

Potentially Significant Impact. The potential for cumulative impacts occurs when the impacts of the Project are combined with impacts from related development projects and result in impacts that are greater than the impacts of the Project alone. Located in the vicinity of the Project Site are other current and reasonably foreseeable projects, the development of which, in conjunction with that of the Project, may contribute to potential cumulative impacts. Impacts of the Project on both an individual and cumulative basis will be addressed in the EIR for the following subject areas: air quality; cultural (historic

and archeological resources) energy; greenhouse gas emissions; land use and planning; noise; public services (fire protection and police protection); transportation; tribal cultural resources; and utilities and service systems (water).

Regarding cumulative aesthetics impacts, related projects would be reviewed on a case-by-case basis by the City to comply with LAMC requirements regarding building heights, setbacks, massing and lighting or, for those projects that require discretionary actions, to undergo site-specific review regarding building density, design, and light and glare effects. Related projects are also subject to the City's design review process and review for consistency with zoning and regulatory documents governing scenic quality. Regardless, pursuant to SB 743, PRC Section 21099, and Zoning Information File No. 2452, the Project's aesthetics impacts are not considered significant. Given the Project Site's location in a TPA, other residential, mixed-use, and employment center development projects located in the vicinity of the Project Site are anticipated to be of similar aesthetic character and would not have incremental combined effects that could create a cumulatively considerable impact. Thus, cumulative impacts associated with aesthetics would be less than significant.

With regard to agriculture and forestry resources, biological resources, and mineral resources, no such resources are located on the Project Site or in the surrounding area. In addition, where applicable, other developments would be required to comply with the Migratory Bird Treaty Act to avoid impacts to nesting birds. Also, similar to the Project, where the removal of on-site trees and street trees is proposed, such developments would be required to comply with City regulations regarding tree replacement. Overall, the Project would have no impact on these resources, and therefore could not combine with other projects to result in cumulative impacts. Therefore, cumulative impacts to agriculture and forestry resources, biological resources, and mineral resources would be less than significant.

With regard to potential cumulative impacts related to human remains, if human remains were discovered during construction, work in the immediate vicinity of the construction area would be halted, the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5. In addition, disposition of the human remains and any associated grave goods would occur in accordance with PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e), which requires that work stop near the find until a coroner can determine that no investigation into the cause of death is required and if the remains are Native American. Therefore, with compliance with regulatory requirements and any necessary mitigation measures, the Project and related projects would not contribute considerably to cumulative impacts on archaeological resources and human remains, and cumulative impacts to such resources would be less than significant.

As discussed above, the Project would not result in significant impacts to geology and soils. Thus, the Project would not contribute to any cumulative impacts associated with geology and soils. In addition, due to their site-specific nature, geology and soils impacts are typically assessed on a project-by-project basis or for a particular localized area. Therefore, as with the Project, related projects would address site-specific geologic hazards through the implementation of site-specific geotechnical recommendations and/or mitigation measures. While cumulative development would expose a greater number of people to seismic hazards, as with the Project, related projects would be subject to local, state, and federal regulations and standards for seismic safety. In addition, as part of the environmental review processes for the related projects, it is expected that a condition of approval or mitigation measures would be established as necessary to address the potential for uncovering of paleontological resources. Thus,

Project impacts related to geology and soils would not be cumulatively considerable and would be less than significant.

Due to their site-specific nature, hazards and hazardous materials impacts are typically assessed on a project-by-project basis. Therefore, as with the Project, related projects would address site-specific hazards through the implementation of site-specific recommendations and/or mitigation measures. In addition, as with the Project, all related development located in the vicinity of the Project Site would be subject to local, regional, State, and federal regulations pertaining to hazards and hazardous materials. Therefore, with adherence to such regulations, the Project and related projects would not result in significant cumulative impacts with regard to hazards and hazardous materials. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

Related projects could potentially result in an increase in surface water runoff and contribute point and non-point source pollutants to nearby water bodies. However, as with the Project, related projects would be subject to the City's LID requirements. In addition, construction projects greater than one acre would be subject to NPDES permit requirements, including development of a SWPPP, SUSMP requirements during operation, and other local requirements pertaining to hydrology and surface water quality. It is anticipated that related projects would also be evaluated on an individual basis by City of Los Angeles Department of Public Works to determine appropriate BMPs and treatment measures to avoid significant impacts to hydrology and surface water quality. Thus, Project impacts related to hydrology and water quality would not be cumulatively considerable and, cumulative impacts would be less than significant.

In terms of population and housing, related development would not induce substantial population growth in the vicinity of the Project Site since most of the area is already fully developed and occupied by a longstanding residential population. In addition, not all related projects would include residential uses. As discussed in the analysis above, the Project does not propose residential uses and thus would not directly contribute to population growth. While the Project would not displace housing or people, other projects might displace existing housing and people residing in them. However, even if construction of replacement housing were required elsewhere, such developments would likely occur on infill sites within the City and the appropriate level of environmental review would be conducted to analyze the extent to which the related projects could cause significant environmental impacts. Overall, the Project's contribution would not be cumulatively considerable, and cumulative impacts related to population and housing would be less than significant.

With regard to public services such as schools, parks, and libraries, the Project would not generate a residential population that would directly increase the demand for schools, parks, and libraries, although the increase in commercial development could indirectly increase the demand for these services. Additionally, the . Other related projects could also increase the demand for these services and facilities. However, like the Project, the applicants for those projects would be required to pay mitigation impact fees for identified impacts under applicable regulatory requirements. Specifically, in the case of schools, the applicants for some related projects may be required to pay school impact fees, which would offset any potential impact to schools associated with the related projects. Similarly, in the case of parks and recreational facilities (i.e., existing neighborhood and regional parks), projects with residential components would be required by the LAMC to include open space and amenity spaces (e.g. gyms, outdoor decks with pools, etc.) and pay park in-lieu fees (as required), which would help reduce the demand on neighborhood and regional parks, thereby reducing the likelihood that there would be substantial

deterioration of parks. Employees generated by the non-residential related projects would be more likely to use parks and library facilities near their homes during non-work hours, as opposed to patronizing local facilities on their way to or from work or during their lunch hours. In addition, each related project would generate revenues to the City's General Fund (in the form of property taxes, sales tax, business tax, transient occupancy tax, etc.) that could be applied toward the provision of enhancing park facilities and library services in the City, as deemed appropriate. These revenues to the City's General Fund would help offset the increase in demand for park facilities and library services as a result of the Project and the related projects. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to schools, parks, and libraries. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

With respect to wastewater, since the HWRP is in compliance with the State's wastewater treatment requirements, and the wastewater generated by the related projects would be typical of urban uses, no industrial discharges into the wastewater system would occur that would exceed the wastewater treatment requirements of the LARWQCB. Additionally, as discussed above, the HWRP currently treats 275 mgd of wastewater and has remaining capacity for 175 mgd. Consequently, there would be no need to construct new or expand wastewater treatment facilities, the construction of which could cause significant environmental effects. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to the wastewater treatment systems. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

With regard to solid waste, given the urbanized and built-out nature of most of the City, it is anticipated that other projects would similarly represent a minor percentage of the remaining capacity of the County's Class III landfills open to the City. Additionally, the demand for landfill capacity is continually evaluated by the County through preparation of the CoIWMP annual reports. Each annual CoIWMP report assesses future landfill disposal needs over a 15 year planning horizon. Based on the 2019 CoIWMP Report, the County anticipates that future disposal needs can be adequately met for the next 15 years (i.e., 2034) with implementation of strategies to maximize waste reduction and recycling, expand existing landfills, promote and develop alternative technologies, expand transfer and processing infrastructure, and use out of county disposal, including waste by rail. The preparation of each annual CoIWMP provides sufficient lead time (15 years) to address potential future shortfalls in landfill capacity. Furthermore, in future years, it is anticipated that the rate of declining landfill capacity would slow considering the City's goal to achieve zero waste by 2030. Therefore, cumulative impacts with respect to solid waste would be less than significant.

As discussed above, the Project Site is located in an urbanized area, and there are no wildlands located in the vicinity of the Project Site. Therefore, the Project would not contribute to an increased wildfire risk. Moreover, the Project and related projects would be developed in accordance with LAMC requirements pertaining to fire safety. Specifically, Section 57.106.5.2 of the LAMC provides that the Fire Chief shall have the authority to require drawings, plans, and sketches as necessary to identify access points, fire suppression devices and systems, utility controls, and stairwells; Section 57.118 of the LAMC establishes LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects; and Section 57.507.3.1 establishes fire water flow standards. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to wildfire. As such, the Project's contribution would not be cumulatively considerable, and 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?

Potentially Significant Impact. Based on the analysis contained in this Initial Study, the Project could result in potentially significant impacts with regard to the following topics: air quality; cultural (historic and archeological resources) energy; greenhouse gas emissions; land use and planning; noise; public services (fire protection and police protection); transportation; tribal cultural resources; and utilities and service systems (water and energy infrastructure). As a result, these potential effects will be analyzed further in the EIR.